

MGA HOMECARE PRIVACY POLICY

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MGA Homecare, and its affiliates, including but not limited to, MGA Home Healthcare, L.L.C.; MGA Home Healthcare Colorado, LLC; MGA Home Healthcare Pueblo, LLC; MGA Healthcare Texas, LLC; A Circle of Care Colorado, LLC; MGA Home Healthcare Fayetteville, LLC; MGA Behavior Therapy, LLC (“**MGA Homecare**,” “**MGA**” “**we**,” “**us**,” or “**our**,” as applicable) value the privacy of our visitors, users, customers, and clients. MGA respects your privacy and is committed to protecting it through our compliance with this policy. This Privacy Policy describes the types of information we may collect from you or that you provide when visiting MGA Homecare’s Website, including <https://mgahomecare.com/> , <https://circleofcarecolorado.com> and <https://mgabehaviorthrapy.com> (individually and collectively, the “**Website**”), and all other related products and services offered by MGA (individually and collectively, the “**MGA Services**”), our practices for collecting, using, protecting and disclosing that information and the

choices you have associated with that information. This Privacy Policy applies only to information we obtain from you when you are online while visiting or using the MGA Services. It does not apply to information we have obtained or may obtain offline through other traditional means.

MGA Homecare complies with privacy laws like the California Consumer Privacy Act (herein called the "CCPA"). The CCPA defines the privacy rights and how companies have to treat and protect the Personal Data and privacy of California residents. MGA Homecare will apply these protections to all its visitors, users, customers, and clients.

This Privacy Policy provides you with the information about what Personal Information we collect, the purpose for which we collect it, what we disclose to whom and your rights limiting its use, etc. MGA Homecare does not sell, rent or loan Personal Information of its visitors, users, customers, and clients.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use the Website and MGA Services. By accessing or using the Website and MGA Services you agree to this Privacy Policy. This policy may change from time to time (see below). Your continued use of the Website and MGA Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Personal Information We Collect

The **Website** and **MGA Services** provide many different services and information to you, our visitors, users, customers, and clients. To deliver or provision these services and to provide you with the best experience possible while using our systems, we collect certain information from you.

Information You Give Us

While using our Services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Your first and last name
- Your address (or general location)
- Your e-mail address
- Your phone number
- Health-related information that you provide to us, such as through an MGA chat function or other online communications. If information you provide to us is covered by HIPAA, it will be treated in accordance with our HIPAA policy found <https://mgahomecare.com/notice-of-privacy-practices/>.
- Log-in credentials
- Payment method information (such as credit or debit card number, or bank account information)
- Employment-related information (i.e. current or past job history or performance evaluations)
- Etc.

Information from Other Sources

When you interact with an MGA account on or through a social media platform, such as Facebook, Google, YouTube, Twitter, Instagram, TikTok, or LinkedIn, we collect the Personal Information that you make available to us on that social media page or account, including your user ID and/or username, and any information you have made public in connection with that social media service. Please note, however, that these platforms have their own privacy policies. MGA Homecare will only collect and store such Personal Information that we are permitted to collect by these social media platforms.

Automatically Collected Information

Some information is automatically received and sometimes collected from you when you visit or use the Website or MGA Services. The following lists the most common information that is automatically received or collected:

- The name of the domain and host from which you access the Internet, including the Internet Protocol (IP) address of the device you are using and/or the IP address of your Internet Service Provider (ISP);
- The MAC Address of devices used to interact with Website and MGA Services;
- The type and version of Internet browser software you use and your operating system;
- Website visited before or after you visit our Website;
- The date and time you access the Website, the length of your stay, and the specific pages that you access while visiting the Website;
- Information concerning the country of origin of your device and the language(s) used by it; and

- Geolocation data.

We use this information to monitor the usage of the Website and MGA Services, assess performance, ensure technological compatibility with your device, and understand the relative importance of the information provided on the Website and MGA Services. We may also use this data to conduct statistical analyses on visitors' usage patterns and other aggregated data.

How We Use Your Personal Information

We use the information we collect from you and about you to fulfil your requests and help us personalize and continually improve your experience with our Services. You have no obligation to provide us with any of your information, but you may not be able to use or access certain portions of our services if you do not provide us with your Personal Information (and you cannot use our Site or Application without agreeing to the terms of this Privacy Policy).

Here is an incomplete list of examples of how we use the data we collect:

- For treatment,
- For healthcare operations,
- For notification purposes,
- To facilitate payments,
- To communicate with you about products and services,
- To provide customer support,
- To let you register for specific programs,
- For derivative advertising,
- For location-based advertising,
- To monitor the usage of our Service,
- To detect, assess, prevent and address technical and performance issues,
- To assist, when necessary, in protecting our rights or property, enforcing the provisions of our Privacy Policy, or preventing harm to you or others,
- To conduct statistical analyses on visitors' usage patterns and other aggregated data;
- To deliver to you relevant advertising from use of demographic and preference information such that advertising related to our Service is targeted to the users for whom they are most pertinent,
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information by following the unsubscribe link or the instructions provided in any email we send,
- To comply with legal requirements,
- Etc.

We will store your information only for as long as we need to use your information for the above purposes or as required by law.

Online Payments/Credit Card Information Security

MGA Homecare is very concerned with the security of your credit card and payment data. For that reason, we do not capture, process or store any credit card related information on MGA's systems. In cases where we provide paid products and/or services, we work with third-party services for payment processing (*e.g.*, payment processors). Their core business is the capturing, processing and storing of your highly sensitive

payment information. Information may be provided directly to our third-party payment processors, whose use of your personal information is governed by their respective Privacy Policy. In the event that MGA Homecare obtains any credit card and payment data, MGA will delete all credit card and payment data provided.

Cookies

Use of Cookies/Tracking Technology

When you interact with the Website and/or MGA Services, we automatically receive and record information on our server logs from your browser, including your IP address, “cookie” information, and the page you requested.

Cookies and other tracking technologies (such as pixels and beacons) are comprised of small bits of data that often include a de-identified or anonymous unique identifier. The Website, apps and other services send this data to your browser when you first request a web page and then store the data on your computer so the Website can access information when you make subsequent requests for pages from that service. We may use these technologies to collect and store information about your usage of the Website or MGA Services (such as the pages you have visited, content you have viewed, search queries you have run, and advertisements you have seen), which information is then used to understand your preferences so as to enable us to provide you with improved services in future visits, and to compile aggregate data about Website traffic and interactions so that we can offer better experiences and tools in the future.

Most browsers are initially set to accept cookies, but you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information. Additional cookie-related information is available at <https://www.allaboutcookies.org/manage-cookies/>. Please note that by blocking any or all cookies, you may not have access to certain features, content, or personalization available through the Website. MGA may utilize email tracking systems that provide data such as who opened or forwarded an email, the time it was opened, and whether the reader clicked certain links within the email.

Analytics

We, as well as third-party vendors acting on our behalf (such as Google), may use first-party cookies (such as the Google Analytics cookies), third-party cookies, or other third-party identifiers to gather anonymous analytics and statistics about our Website and how it is being used by our visitors so we can improve our Website and MGA Services. Our web server storage logs may collect the domain names, internet protocol addresses, the types of web browsers, and certain data of visitors to the Website.

Data about your activities online may be collected for use in providing advertising tailored to your individual interests, either by us, our affiliates, or third parties. We may work with third parties such as network advertisers and ad exchanges to serve advertisements across the internet and may use third party analytics service providers to evaluate and provide us and/or third parties with information about the use of these ads on third party Website and viewing of ads and of our content.

We and these third-party vendors, including Google, may use third-party technologies together with our own first party technologies in order to analyze ad impressions, your use of ad services, and interactions

with these ad impressions and ad services. The information collected may also include information about your visits to our Website, the pages you have viewed, and what content you have seen or interacted with. These third-party tracking technologies may be set to, among other things: (a) help deliver advertisements to you that you might be interested in; (b) prevent you from seeing the same advertisements too many times; and (c) understand the effectiveness of the advertisements that have been delivered to you.

You can opt out of certain advertising by visiting the Network Advertising Initiative consumer opt out page at <http://optout.networkadvertising.org/> , by using the Google Analytics Opt-out Browser Add-on available at <https://tools.google.com/dlpage/gaoptout> , or by visiting the Digital Advertising Alliance's opt-out page at <https://www.aboutads.info/choices> . Please note that at this time we do not respond to browser-based "do not track" signals.

How We Store Your Information

Personal information received by MGA Homecare from you or third parties may be stored and processed in the United States or any other country where we or our service providers maintain facilities.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all the steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy and no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place, including the security of your data and other personal information, and as per applicable data privacy laws. This policy may not constitute your entire set of privacy rights, as these may also vary from country to country or state to state. To be certain of your privacy rights, you may wish to contact the appropriate agency in your country or state that is charged with overseeing privacy rights of consumers.

How We Share Your Information

Information about our visitors, users, customers, and clients is an important part of our business. We share personal information only as described below.

Service Providers

We may employ third-party companies and individuals, such as payment processors, contractors, vendors, or distributors, to facilitate our Services, provide the Services on our behalf, perform Services-related services or assist us in analyzing how our Services are used ("Service Providers"). These third parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose to third parties or use it for any other purpose and are additionally required to keep it confidential.

Service providers employed fall into the following categories:

- Business Associates,
- Payment processors,
- Payroll processors,
- Fulfillment services,
- Data management services,
- Marketing services,

- CRM Platform providers,
- Security services.

Third Parties

As explained above, MGA Homecare does not sell, rent, or loan any personal information regarding our visitors, users, customers, and clients to any unrelated third parties. Third Parties may include disclosure to, consistent with applicable law, to Health Institutions, Regulatory Agencies (i.e. the Food and Drug Administration), Health Oversight Agencies (i.e. Department of Health Services, the federal or state agencies that oversee Medicare and Medicaid, professional licensing boards, etc.).

Law enforcement

Under certain circumstances, we may be required to disclose your personal information if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

Legal Requirements

We may disclose your personal information in the good faith belief that such action is necessary to:

- To comply with a legal obligation,
- To protect and defend the rights or property of MGA Homecare,
- To prevent or investigate possible wrongdoing in connection with the Services, and
- To protect the personal safety of users of the Services or the public.

Merger, Sale, or Bankruptcy

If we sell all or part of our business, or make a sale or transfer of our assets, or are otherwise involved in a merger or transfer of all or a material part of our business, or are involved in a bankruptcy, MGA Homecare may transfer your information to the party or parties involved as part of that transaction.

Psychotherapy Notes

We will not use or disclose your psychotherapy notes without your authorization, unless the use is by the person who wrote the notes for purposes of treatment, for training of medical or counseling professionals, or for us to defend ourselves in a legal proceeding brought by you. In addition, any other disclosure or use of psychotherapy notes must be to the Department of Health and Human Services; required by law; for the health oversight of the practitioner that wrote the notes; to the coroner or medical examiner; or to avert a serious threat to the health or safety of a person or the public.

How We Secure Your Information

MGA Homecare is committed to ensuring that your information is secure. We use commercially reasonable efforts to protect your personal information collected, used, stored, shared, or transferred as part of our Services from access, loss, misuse, alteration, or destruction by any unauthorized party. Please understand, however, that no transmission of data over the internet or any other public network can be guaranteed to be 100% secure. We do not promise, and you should not expect, that your personal

information or private communications will always remain private. You are also responsible for taking reasonable steps to protect your information against unauthorized disclosure or misuse such as by maintaining the confidentiality of your personal information.

Children's Privacy

MGA Homecare respects the privacy of children, and we are committed to complying with the Children's Online Privacy Protection Act (herein called "COPPA"). We do not knowingly collect Personal Information from children under the age of thirteen (13). If you are a parent or guardian and you are aware that your child under the age of 13 has provided us with personally identifiable information, please contact us. If we become aware that we have collected personally identifiable information from children without verification of parental consent, we take steps to remove that information from our servers.

Links to Other Websites

The Website and MGA Services may contain links to other websites or mobile applications that are not operated by us, such as Facebook, Instagram, Twitter, LinkedIn and YouTube. If you click a third-party link, you will be directed to that third-party's website or mobile application. We strongly advise you to review the privacy policy of every website you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party website, mobile applications or services.

Internet Advertising and Third Parties

The Website and MGA Services may include third-party advertising and links to other websites and applications. Third-party advertising partners may collect information about you when you interact with their content, advertising, or services.

When visitors interact with our Service online, third parties may place cookies on your browser(s) for targeted advertising purposes. If you wish to opt-out of such targeted advertising, please adjust the cookie settings of your browser. Instructions can be found at <https://www.allaboutcookies.org/manage-cookies/>. You may opt out using the Digital Advertising Alliance's WebChoices Tool at <https://optout.aboutads.info/>.

Your Health Information Rights

You have the following rights regarding your personal health information:

Right to Request Restrictions. You have the right to request restrictions on our use or disclosure of your personal health information for treatment, payment or health care operations. You also have the right to restrict the personal health information we disclose about you to a family member, friend or other person who is involved in your care or the payment of your care. Your request should be submitted in writing to the address listed below.

We are generally not required to agree to your requested restriction. However, we must agree to your request to not share your health information with your health insurer about a service which you (or someone other than your insurer) has paid us in full and where the disclosure is for the purpose of carrying out payment or health care operations and where the disclosure is not otherwise required by

law. If we do agree to accept your requested restriction, we will comply with your request except as needed to provide you emergency treatment.

Right of Access to Personal Health Information. You have the right to inspect and obtain a copy of your medical records or billing records or other written information that may be used to make decisions about your care, subject to some limited exceptions. Such records will be provided to you in the time frames established by law. If permitted by law, we may charge a reasonable fee for our costs in copying and mailing your requested information. If you are requesting records from an office in Colorado, we will deliver the medical records in electronic format if you or your personal representative requests electronic format, the original medical records are stored in electronic format, and the medical records are readily producible in electronic format. Your request should be submitted in writing to the address listed below.

We may deny your request to inspect or receive copies in certain limited circumstances. If you are denied access to personal health information, in some cases you will have the right to request a review of the denial.

Right to Request Amendments. If you believe that any health information in your record is incorrect or if you believe that important information is missing, you may request that we correct the existing information or add the missing information. Such requests must be made in writing to the address listed below and must provide a reason to support the amendment.

We may deny your request for amendment in certain circumstances. If we deny your request for amendment, we will give you a written denial including the reasons for the denial and the right to submit a written statement disagreeing with the denial.

Right to an Accounting of Disclosures. You have the right to request an “accounting” of the disclosures we make of your personal health information. This is the listing of certain disclosures of your personal health information made by us or by others on our behalf, but does not include disclosures for treatment, payment and health care operations or certain other exceptions.

To request an accounting of disclosures, you must submit a request in writing to the mailing address listed below, stating a time period beginning within six years from the date of your request. An accounting will include, if requested; the disclosure date; the name of the person or entity that received the information and the address, if known; a brief description of the information disclosed; a brief statement of the purpose of the disclosure or a copy of the authorization request; or certain summary information concerning multiple similar disclosures. The first accounting provided within a 12-month period will be free; for further requests, we may charge you our costs. Requests should be submitted to the address listed below.

Right to Receive a Paper Copy of This Notice. You have the right to obtain a paper copy of this notice, even if you have agreed to receive this notice electronically. You may request a paper copy of this notice at any time by contacting us at the telephone number and addresses listed below.

Right to Request Confidential Communications. You have the right to request that we communicate with you concerning personal health matters in a certain manner or at a certain location. For example,

you can request that we contact you only at a certain phone number. We will accommodate your reasonable requests.

Right to be Notified in the Event of a Breach. In the event we determine that the confidentiality of your unsecured health information has been breached, you have the right to be notified.

Right to Revoke Authorization. You may revoke an authorization to use or disclose health information, except to the extent that action has already been taken. This request must be made in writing to the applicable address listed below.

California Disclosures

If you are a California resident, we are required to provide additional information concerning how we use and disclose your Personal Information. You may have additional rights regarding how we use your Personal Information. <https://mgahomecare.com/ccpa-consumer-privacy-policy/>

If you are a California resident and have an established business relationship with us, California Civil Code Section 1798.83 permits you to request a notice disclosing the categories of Personal Information we have shared with third parties, if any, for the third parties' direct marketing purposes, during the preceding calendar year. To request a notice, please submit your request to the contact information provided below. California law also permits residents of California to opt-out of MGA's disclosure of Personal Information to third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your Personal Information with third parties for marketing purposes at any time by submitting a request in writing to the contact information provided below. Please note that this opt-out does not prohibit disclosure made for non-marketing purposes.

Notice to Non-U.S. Users

As the Internet is a global environment, collecting and processing Personal Information may involve the transmission of this data internationally, including into and/or outside of the United States. Therefore, by communicating electronically with us, you acknowledge and agree to your personal data being processed in this way.

Specifically, if you are located outside of the United States, please be aware that by using the Website or MGA Services, your information may be transferred to the United States or other third-countries, the privacy laws of which may be deemed by your country to have inadequate data protection. If you are located outside of the United States and voluntarily submit information to us, you thereby consent to the general use of such information as provided in this Privacy Policy and to the transfer of that information to, and/or storage of that information in, the United States or other third-countries.

Changes to This Privacy Policy

We may make changes to our Privacy Policy from time to time. We will notify you of any material changes by posting the new Privacy Policy to the **Website** and **MGA Services** and updating the "Last Updated" date. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. Your continued use of the **Website** and **MGA Services** following the posting of changes constitutes your acceptance of such changes.

Contact Us

We are committed to working with you to resolve any complaints you may have regarding this Privacy Policy or the treatment of your Personal Information. If you have any questions about this Privacy Policy or its implementation, please contact us:

By Mail: MGA Homecare
Attn: Privacy Officer
7025 North Scottsdale Road, Suite 200
Scottsdale, AZ 85253

By Phone: (844) 399-5338

By Email: compliance@mgahomecare.com

To file a complaint with the Office of Civil Rights you may submit a complaint online at: <https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf>.

You may also submit a complaint to the OCR via email at OCRComplaint@hhs.gov. We will not penalize you or retaliate against you in any way for filing a complaint with the federal government.