# **Protecting Your Personal Information**

Allendale Treatment and its <u>respective affiliates</u> (collectively, "ALLENDALE TREATMENT", "we" and/or "us") are committed to protecting the privacy of the individuals ("visitors" and/or "you") who visit our website and subpages located at <u>https://www.Allendale Treatment.com/</u> (the "Site").

# SCOPE

This Website Privacy Notice ("Website Notice") describes ALLENDALE TREATMENT's privacy practices in connection with your use of the Site. We provide information about the choices you have regarding the collection or use of your personal information or personal information, including similar terms as defined by various jurisdictions, and the rights provided to you, including the ability to access or update your personal information. This Website Notice does not cover ALLENDALE TREATMENT's privacy practices for:

- ALLENDALE TREATMENT products and services, accessible via the Site or otherwise, and whether used by ALLENDALE TREATMENT's customers, partners or end users; or
- Biometric data and ALLENDALE TREATMENT's timekeeping devices.
- Children and/or Minors. Our Site is neither designed nor intended for any visitors under 18 years of age. If you have any reason to believe that a visitor to our Site is under 18 years old, please contact us at <u>hr@allendaletreatment.com</u> and we will endeavor to delete the information from our databases.

# What is Personal Information?

The Website Notice applies to personal information collected from visitors to the Site. For purposes of this Website Notice, personal information means information collected by ALLENDALE TREATMENT relating to an identified or identifiable natural person.

## Links to Non-ALLENDALE TREATMENT Websites

For your convenience, the Site may contain links to third-party websites and/or information. When you access those links, you leave ALLENDALE TREATMENT's Site and are redirected to a third-party website. ALLENDALE TREATMENT does not control third-party websites, thus the privacy practices of third parties might differ from ALLENDALE TREATMENT's privacy practices. We do not endorse or make any representations about third-party websites. When you share personal information with third-party websites, the third-party processing is not covered by this Website Notice. We encourage you to review the privacy policy of any website or company before sharing personal information.

# HOW ALLENDALE TREATMENT COLLECTS YOUR PERSONAL INFORMATION

Sources of Personal information and Personal Information we Collect:

ALLENDALE TREATMENT collects personal information from several different sources, including:

- Directly from a website visitor including job applicants;
- From service providers or other third parties; and
- Automatically from a website visitor's visit or activity on our Site.

Please review each of the sections below to learn more about how ALLENDALE TREATMENT collects personal information, and what personal information is collected.

Directly From Website Visitors Including Job Applicants

# How We Collect Personal Information

ALLENDALE TREATMENT collects personal information when you visit our Site and when you choose to provide personal information. For example, we collect information when you contact us via our Site, provide your email, phone number or other similar contact information, such as the information that you provide when you sign up for a webinar. Job candidates who complete an application for employment with ALLENDALE TREATMENT or create a profile on this website may also provide credentials and other information relevant to the job application.

## What We Collect

The personal information collected from a visitor to our Site may include:

- Name;
- Company;
- Job Title;
- Address;
- Phone Number; and
- Email Address.

The personal information collected from an applicant or employee of ALLENDALE TREATMENT includes, but is not limited to:

- Personal Identifiers (Name, Address, Age, Date of Birth, Social Security Number);
- Professional or Employment-related Information (Employment Record, Salary);
- Education Information; and
- Personal/Professional Contact Information.

Information Provided by Third Parties or Publicly Available Sources

We may receive information about you from other sources and combine that information with the information we collect directly. Examples of information we may receive from other sources include: purchased business contact information and from publicly accessible websites, such as your company's website, professional network services, or press releases. Business contact information may include:

- First name
- Last name
- Business email
- Telephone number
- Company name
- Job level
- Functional role
- Business street address
- Online identifier
- Employment history

We use this data for our internal customer analytics, to identify prospective customer marketing opportunities, and to improve the relevance of our Site content and our advertising.

### **How We Collect Personal Information**

We may collect or receive personal information from third parties including from our affiliates, marketing companies, job posting websites and recruiting firms. This data may be licensed by third parties or available publicly.

#### What We Collect

The categories of personal information collected from third parties include the categories indicated below.

### Website Information

As a visitor, you may be asked or choose to provide us with your personal information on some areas of our Site, such as:

- First name
- Last name
- Business email
- Telephone number
- Company name
- Job level
- Functional role
- Street address

Some areas of the Website require you to create a user account. As part of your user account, you may choose to provide us with additional information, such as:

- A photo
- Social media profiles
- Areas of expertise

## ALLENDALE TREATMENT Events Information

If you register to attend an ALLENDALE TREATMENT-sponsored Event, we may require certain data, including:

- First name
- Last name
- Business email
- Telephone number
- Company name
- Emergency contact (in some instances)
- Dietary preferences (in some instances)
- Health and safety information (in some instances)
- Billing information (such as billing name, billing address, and credit card number)

#### **Customer Account Management Information**

We collect business contact information for account management purposes related to the use of ALLENDALE TREATMENT professional services.

# **Analytics Information**

Our Site may record information concerning how often you use the application, the events that occur within the application, aggregated usage, performance data, your IP address. We do not link the information we store within the analytics software to any personal information you submit within the Site.

If you use certain systems provided by ALLENDALE TREATMENT, we will collect data from you to enable multifactor authentication, such as mobile number, email address, or unique verification identifier.

## **Cookies and Other Similar Technologies**

Like many websites, ALLENDALE TREATMENT uses cookies and similar tracking technologies (including for analytics, functionality, advertising, and other purposes). For more information about the technologies, we use and how you can control these technologies, please see our <u>Cookie Notice</u>.

# Other Information

If ALLENDALE TREATMENT collects any other personal information from you, we will explain which personal information is collected and the purpose for its collection.

Information Collected Directly from Social Media Features

## How We Collect Personal Information

Our Site may include social media features, such as video links and other functionality to demonstrate your interest in our Site and other materials and may set a cookie to enable such functionality. This functionality may be hosted by a third party or hosted directly on our Site. When provided or hosted by a third party, your use and interactions with these features is at your discretion and is governed by the privacy policy of the companies providing them.

## What We Collect

These features may collect your personal information such as your IP address and which page in our Site you are visiting.

# HOW ALLENDALE TREATMENT USES PERSONAL INFORMATION Why We Use Your Personal Information:

Our purposes of processing personal information include:

- To fulfill the purpose(s) for which the information was collected or provided, including to communicate with you and respond to your inquiries and requests;
- To improve our Site, products and services, through testing, research, analysis and product development;
- To market, advertise, and promote our products and services, such as to make suggestions and recommendations to you about products or services that may be of interest to you;
- To provide support and information about our product and services via virtual assistant, also known as chatbot, available 24/7 on our Sites;

- To provide training related to the products and services, such as making available training materials or events (whether in-person or online) for which we may use your personal information to provide notices and information regarding such training and events;
- To review and verify information from job applicants;
- For security, audit, internal investigation, and fraud prevention purposes, such as to prevent unauthorized access or disclosure, to maintain data accuracy, to protect the confidentiality, integrity, and availability of your personal information; to allow only the appropriate use of your personal information; to identify any fraudulent, harmful, unauthorized, unethical or illegal activity;
- To manage litigation, such as in connection with establishing, exercising, or defending our legal rights where it is necessary for our legitimate interests or the legitimate interests of others;
- To improve the content and format of our Site by using cookies and other similar technologies, such as to measure the preferences of our Site visitors, analyze trends, administer the Site, analyze use of the Site, and to gather demographic information about visitors to the Site;
- To allow us to better understand the functionality of our mobile applications, though we do not link the usage information we collect through the mobile applications to any personal information you submit within the mobile application;
- For other purposes for you have provided consent;
- To aggregate or deidentify your personal information so that the information can no longer be linked to you or your device and use and share such data for any business purpose in accordance with applicable law; and
- To comply with all applicable legal obligations, such as to comply with subpoenas and other court orders to process data where we have determined there is a legal requirement to do so.

# WHEN ALLENDALE TREATMENT SHARES YOUR PERSONAL INFORMATION

Please note, ALLENDALE TREATMENT does not sell personal information to third parties. The term "sell" as defined by applicable laws, means disclosure of personal information to third parties for monetary or other valuable consideration.

Please review each of the sections below to learn more about how we may share your personal information.

Affiliates and Subsidiaries:

We may share your personal information with our <u>Affiliates & Subsidiaries</u> in order to facilitate delivery of a product or service or complete a task that you requested.

#### Third Parties (Vendors/Service Providers):

We may engage with third parties (vendors and/or service providers) to facilitate delivery of a product or service (or perform certain functions such as enhancing and/or delivering our product and service offerings); complete a task that you requested; provide training; conduct marketing and advertising; operate, secure, and optimize the Site; and coordinate and work with our partners.

We have contracts with such third parties to perform certain functions on our behalf, and only at our direction. These third parties are bound by agreements that contain confidentiality and other data protection terms designed to ensure the third parties only use your personal information to the extent necessary to provide these contracted services in accordance with our instructions (and for the purposes we disclose). ALLENDALE TREATMENT may use support for marketing purposes, such as managing email campaigns. In such circumstances, ALLENDALE TREATMENT is the data controller, and a virtual assistant (chatbot) may act as a processor. Data Protection Agreements are in place to ensure the privacy and use of your data are in accordance with this Notice.

### Additional Disclosures

We may disclose your personal information as necessary to:

- To provide customer service or technical support regarding training or webinars for which you register or attend;
- For our administration, and business operation purposes and to keep a record of your relationship with us;
- Comply with the law or with legal obligations, such as with law enforcement officials, government
  authorities or other third parties in response to a lawful request for information by a competent authority,
  if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation, or
  legal process, including to meet national security or law enforcement requirements;
- To manage litigation and conduct internal audits and investigations, such as to protect and defend our rights and property, investigate fraudulent or illegal activity, and conduct internal financial, security, or other audits;
- Protect against misuse or unauthorized use of our Site, products, and services;
- Protect the personal safety or property of our users or the public (among other things, this means that if you provide false information or attempt to use another's identity, information about you may be disclosed as part of any investigation into your actions)
- In connection with, or during the negotiation of, any merger, sale of company assets, consolidation or restructuring, financing or acquisition of all or a portion of our business by or to another company, including the transfer of contact information and data of customers, partners, and end users;
- In an aggregated and de-identified or anonymized form; and
- When we have your consent to share the information.

Other than as stated in this Website Notice, we will endeavor not to release your personal information to unknown or unaffiliated third parties, and we will not cross-reference your personal information with that of any other customer or entity.

# **RETAINING PERSONAL INFORMATION**

ALLENDALE TREATMENT will only retain personal information for the length of time necessary to fulfill the purpose(s) for which the information was collected or as required or permitted by applicable laws, (including the resolution of disputes) and in accordance with our customer contracts.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which we process your personal information, and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require your personal information, we will either delete or deidentify it or, if this is not possible, we will securely store it in accordance with this Website Notice and cease use of the personal information until deletion is possible. If we deidentify your personal information (so that it is no longer associated with you), we may retain this information for longer periods.

# DATA SUBJECT RIGHTS

In accordance with applicable law and depending on your location, you may be entitled to exercise some or all the following rights regarding our collection, use, and sharing of your personal information:

- Access the personal information we maintain about you;
- Update or correct any inaccurate or incomplete personal information about you;
- Request that we delete your personal information;
- Object to or restrict the processing of your personal information;
- Receive the personal information you have previously provided to ALLENDALE TREATMENT, in a machinereadable format, allowing you to transfer that personal information to another company at your discretion;
- Not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you; and
- File a complaint directly with your governmental representative (such as your Supervisory Authority) about how we process your personal information. •
- Dispute resolution

#### Exercising Your Rights

To protect your privacy and security, we take reasonable steps to verify your identity before granting access to your personal information. Please follow the instructions below based on your relationship with ALLENDALE TREATMENT and provide the requested information to allow us to adequately address your request. We will respond to your request within a reasonable timeframe and as otherwise required by applicable law in your location.

If you are not a California resident and would like to request access to your personal information or request erasure (right to be forgotten) of personal information previously provided, please contact <u>hr@allendaletreatment.com</u>.

## CALIFORNIA RESIDENTS - CALIFORNIA PRIVACY NOTICE

For California residents, The California Consumer Privacy Act ("CCPA") provides certain privacy-related rights. If you are a California resident please contact <u>hr@allendaletreatment.com</u>.

#### Do Not Track

Some internet browsers may be configured to send "Do Not Track" signals to the websites that you visit. We currently do not respond to "Do Not Track" or similar signals.

#### **Choosing Not to Share Your Personal Information**

You may choose not to provide personal information. If you choose not to provide personal information (or ask us to delete it), we may not be able to provide you with our Site, the Site functionality may be limited, or we may not be able to otherwise fulfill requests you submit to us. We will tell you what information you must provide for us to fulfill your request by designating it as required at the time of collection or through other appropriate means.

#### **Denial of Requests**

ALLENDALE TREATMENT may deny a request submitted in accordance with the above as permitted by applicable law in your location. ALLENDALE TREATMENT will endeavor to notify you regarding any decision and reason(s) for denial in a timely manner and otherwise in accordance with applicable law in your location.

# **Dispute Resolution**

In accordance with this Website Notice, ALLENDALE TREATMENT will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of your personal information. Additionally, ALLENDALE TREATMENT will cooperate with governmental authorities upon request.

Any privacy-related dispute or concern that is still unable to be resolved to your satisfaction shall be handled in accordance with applicable dispute resolution procedures, free of charge, through our U.S.-based third-party dispute resolution provider.

We strongly encourage you to contact us directly with any complaints you may have with regard to this Website Notice or our privacy practices prior to proceeding to the arbitration procedure described above.

# SECURITY

ALLENDALE TREATMENT utilizes physical, technical, and administrative controls and procedures designed to safeguard the information we collect, prevent unauthorized access or disclosure, to maintain data accuracy of your personal information, and to restrict the processing of your personal information as set forth in this Website Notice.

We utilize a variety of physical and logical access controls, firewalls, intrusion detection and prevention systems, network and database monitoring, anti-virus, and backup systems. We use encrypted sessions when collecting or transferring sensitive data through our Site.

We limit access to your personal information and data to those persons who have a specific business purpose for maintaining and processing such information. Our employees who have been granted access to your personal information are made aware of their responsibilities to protect the confidentiality, integrity, and availability of that information and have been provided training and instruction on how to do so.

For additional information regarding ALLENDALE TREATMENT's commitment to cybersecurity, please refer to ALLENDALE TREATMENT's IT – Cybersecurity page in the employee handbook.

# ENFORCEMENT AND VERIFICATION

ALLENDALE TREATMENT will periodically assess its operations to validate compliance with this Website Notice.

We will take reasonable steps to prevent or address any unauthorized use or disclosure of your personal information in a manner contrary to this Website Notice. We hold our employees and third parties accountable to maintain the trust that you place in ALLENDALE TREATMENT.

# CHANGES TO THIS PRIVACY NOTICE

This Website Notice is effective August 1, 2023. ALLENDALE TREATMENT reserves the right to modify or amend this Website Notice at any time consistent with applicable laws. We encourage you to periodically review this page for the latest information on our privacy practices.

# CONTACT INFORMATION

At any time, you may contact ALLENDALE TREATMENT with questions or concerns about this Website Notice at hr@allendaletreatment.com.

Written responses may also be submitted to:

Allendale Treatment Attention: Human Resources 5419 County Road 427 Auburn, IN 46706

ALLENDALE TREATMENT will respond to all correspondence within a reasonable timeframe, including as required by applicable law.