

**D & D CARE HOMES • UNIFIED CARE GROUP • ST. GILES LIVING CENTERS • DAYBREAK
CAREGIVER GA, LLC • CG OF TENNESSEE, LLC • CG-HHC, LLC • CG-DSA, LCC
ROYAL JOURNEYS • HAS, LLC • NEW CHOICES, INC**

Caregiver SMS Privacy Policy

What information we collect about you

When you receive text messages from us, or when someone like a parent or guardian signs up on your behalf, we collect a small set of basic information:

- Your mobile phone number and name
- Your role — whether you are a client receiving services, a parent or guardian, or an employee
- A record of when and how you agreed to receive texts, and if or when you asked us to stop
- Basic delivery information — whether messages were sent and received successfully

What we use your information for

We only use your contact information to run our services, never to sell you things you didn't ask for. Specifically, we use it to:

- Send you text messages you've agreed to receive
- Coordinate appointments and services for individuals receiving care
- Share scheduling and operational updates with employees
- Keep a record of your communication preferences, including if you've opted out
- Meet our legal obligations under federal and state law

Who sees your information

We do not sell or rent your phone number to anyone. The only situations where your information is shared are:

- Text messaging vendors — the technology companies that deliver our texts on our behalf. They are bound by confidentiality agreements and Business Associate Agreements (BAAs) that legally require them to protect your information.
- State or federal oversight agencies — when required by the laws that govern disability services programs.
- Law enforcement or courts — only when legally required by a court order or law.

Your health privacy (HIPAA)

We are committed to protecting your health information under federal law (HIPAA). Here is what that means in practice:

- Text messages will only cover scheduling, reminders, and general announcements — never clinical details
- Any detailed care information is shared only through secure, HIPAA-compliant channels
- Our text vendors are required to sign agreements, called Business Associate Agreements, that hold them to the same privacy standards we follow
- If there is ever a data breach that affects your health information, we will notify you as required by federal law

Your rights — what you can ask us to do

Depending on where you live, you have rights over your personal information. You can contact us at any time to exercise these:

- See your information — Ask us what personal data we hold about you
- Correct errors — Ask us to fix inaccurate information
- Delete your data — Ask us to delete your information, subject to any legal obligations we have to keep certain records
- Stop texts anytime — Reply STOP to any message or contact us directly. We will honor your request immediately.

***For any questions about this policy, to exercise your rights, or to opt out of text messages:
Caregiver Compliance Department Email: compliance@cg-idd.com***

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How to opt out of texts

Reply STOP to any text message from us and you will be removed immediately. You can also email or call us using the contact information below. We are required by federal law (TCPA) to honor opt-out requests promptly. Opt-out records are kept indefinitely to make sure we respect your preference.

Parents, guardians, and legal representatives

If you are a parent, legal guardian, or Legally Authorized Representative (LAR) managing communications on behalf of a client:

- By signing up, you are confirming you have the legal authority to do so on that person's behalf
- Please notify us promptly if your legal authority changes, for example if a guardianship order changes
- We do not independently verify guardianship status — that responsibility rests with you

Protecting minors

We do not send text messages directly to anyone under 18. All SMS communications for minor clients are sent to and managed by their parent or guardian. We will never send texts to a minor without parental or guardian consent.

How we store and protect your data

- How long we keep records — We retain consent and message records for as long as required by law. Opt-out records, meaning your request to stop texts, are kept permanently to make sure we always honor your preference.
- Security — We use administrative, technical, and physical safeguards to protect your information. No system is perfect, but we take your privacy seriously and continuously work to keep your data safe.
- Multiple states — We operate in more than one state. If your state provides additional privacy rights beyond what is described here, we will honor those rights. Contact us to ask about your specific state.

If this policy changes

We may update this policy from time to time to reflect changes in our program or the law. When we do, we will update the Last Updated date and version number at the top of this page. Continuing to receive our texts after a change is posted means you accept the updated policy. If you have questions about any changes, please contact us.