

Privacy Policy

Effective starting: October 1, 2025

Last Updated: October 26, 2026

This policy explains how the organization collects, uses, and protects personal information when you use GRC services.

POLICY:

Gateway Rehabilitation Center (“GRC”, “we”, “our”, “us”) values and respects the privacy of individuals. This Privacy Policy (“Privacy Policy”) describes the types of information, including Personal Data, that GRC processes as part of our website, <https://www.gatewayrehab.org>, and other related sites including content that a User submits and social networking sites (collectively, the “Services”). This Privacy Policy outlines individual rights regarding the Services, use and disclosure of Personal Data related to the Services.

As used in this Privacy Policy, the term “Personal Data” means information that identifies an individual or a household directly or indirectly, by reference to identifier(s) such as name, identification number, location data, online identifier or one or more factors specific to an individual’s physical, physiological, genetic, mental, economic, cultural, educational, commercial, professional or social identity.

The terms of this Privacy Notice are not intended to supersede any corporate agreements in place with your employer or other organization that you are affiliated which has contracted to use GRC services (“Agreement(s)”). In the event of conflict between this Privacy Notice and such Agreement(s), the terms of the Agreement(s) will prevail.

If there are questions about our privacy practices, please refer to the end of this Privacy Policy for information about how to contact us. **If you do not agree with this Privacy Policy, do not access or use our Services or interact with any aspect of our business.**

HIPAA Compliance and Protection of Health Information

Gateway Rehabilitation Center complies with the Health Insurance Portability and Accountability Act (HIPAA) and applicable state privacy laws. All individually identifiable health information (“Protected Health Information” or “PHI”) submitted to GRC is securely stored, and used only for treatment, payment, and healthcare operations. We do not disclose PHI without your consent except as permitted or required by law.

PROCEDURE:

1. Personal Data Collection:

GRC collects information about a User whenever a User provides it to GRC, when a User uses Services, and when other sources provide information to GRC, as further described below. Some Personal Data is collected from Users through the Services.

a. Types of Personal Data Collected.

b. Among the types of Personal Data collected through the Services, by GRC itself or through third parties, are: Cookies; Usage Data; email address; first name; last name; phone number; and IP address.

c. Details of each type of Personal Data collected are provided in the dedicated sections of this Privacy Policy or through explanatory messages displayed prior to the data collection.

d. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using the Services. This includes information provided to GRC by a User when a User registers for an account, creates or modifies a profile, sets preferences, or signs up for certain Services. For example, a User provides contact information, and, in some cases, billing information, when a User registers for Services. GRC may also keep track of a User's preferences when a User selects settings within the Service.

e. GRC also collects additional information that a User chooses to provide to GRC. This information includes any feedback that a User may provide to GRC and we collect information using analytics techniques that hash, filter or otherwise scrub information to exclude information that might identify a User; and we collect clickstream data about how a User interacts with and uses features in the Services.

f. GRC collects payment and billing payment information provided by a User. For example, you may provide payment information, such as payment card details, which we collect via secure payment processing services.

g. Unless specified otherwise, all Personal Data requested by the Services is required for a User to use the Services and failure to provide this data may make it impossible for GRC to provide the Services. In cases where the Services indicate that some Personal Data is not required, Users are free not to communicate this data without impact on the availability or the functionality of the Services.

h. GRC collects phone numbers for SMS communication purposes. Information obtained specifically as part of the SMS consent process will not be shared with third parties. SMS communication for existing and prospective patients may include appointment reminders, follow-up to appointment requests and GRC location information (i.e., site addresses). SMS communication for potential job applicants may include information about application status, training schedules and other employment-related updates. SMS communication with established vendors may include project status updates, requests for service and requests for quotes. Message and data rates may apply. You can opt-out at any

time by texting 'STOP.' For assistance, text 'HELP' or visit our website at <https://www.gatewayrehab.org>.

i. GRC automatically collects information about a user's computer, phone, tablet, or other devices a User uses to access the Services. This includes a user's connection type and settings when a User installs, accesses, updates or uses GRC's Services. GRC also collects information through a User's device about the User's operating system, browser type, IP address, URLs or referring/exit pages, device identifiers, and crash data. GRC may use a User's IP address to approximate a user's location to provide such User with better Service experience. How much information GRC collects depends on the type and settings of the User's device being used to access the Services. Users and/or their Server and data center service administrators can disable collection of this information via the administrator settings or prevent this information from being disclosed to GRC by blocking transmission at the local network level.

j. GRC may also receive information about a User from GRC's affiliates, GRC's business partners, other third party providers or from publicly available sources (such as social media platforms), including a User's physical mailing address, job titles, email addresses, phone numbers, intent data or user behavior data, IP addresses and social media profiles for the purposes of marketing GRC's services, delivering personalized communications, community events, community outreach programs, other assistance programs, and profiling.

l. Users who are uncertain about which Personal Data is required for the Services are welcome to contact GRC.

m. Users are solely responsible for any third-party Personal Data obtained, published or shared by such Users through the Services and confirm that they have the third party's consent to provide such data to GRC.

n. In addition to the information contained in this Privacy Policy, GRC may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

2. Use of Personal Data and Purpose of Processing:

a. GRC processes Personal Data, including sharing it with third parties, where processing is necessary for the purposes of our legitimate commercial interests and performance of the Services as further described in this Section. GRC does not sell Personal Data that we collect.

b. The purposes for which each type of Personal Data is collected through the Services are as follows:

- i. Providing the Services to Users
- ii. Performing analytics on the Services
- iii. Contacting the User (via email, SMS notification, phone call, or other approved methods)
- iv. Displaying content from external platforms
- v. Managing contacts and sending messages
- vi. Performing platform services and hosting
- vii. Managing registration and authentication
- viii. Managing system logs and maintenance
- ix. Performing internal operations, such as improving the effectiveness of our Services
- x. Conducting audits
- xi. Providing information to representatives and advisors to help comply with legal, accounting, or security requirements
- xii. Transferring information as part of a merger or sale of the business
- xiii. Resolving disputes between Users, customers, and GRC
- xiv. Protecting the rights, safety, and information of GRC, customers, members, and third parties
- xv. Complying with legal obligations, detecting malicious or fraudulent activity
- xvi. Research and development to improve Services and develop new functionalities, products, services, features, and technologies
- xvii. Improving communication with Users via chosen contact methods
- xviii. Resolving technical issues, responding to support requests, analyzing crash information, repairing and improving Services
- xix. Interacting with or disclosing information to third parties through the Services, consistent with User's privacy settings

c. A User's Personal Data may be used for legal purposes by GRC in court or pre-legal stages. GRC may be required to reveal Personal Data upon request of public authorities.

- i. GRC may use a User's Personal Data to send communications via approved methods.
- ii. GRC may aggregate, combine, anonymize, and/or pseudonymize data for analytics, Service improvement, and research.

3. Who Can Access Personal Data Collected:

- a. GRC will only disclose Personal Data as set forth in this Privacy Policy, as permitted by law, or with the User's consent. Third parties processing Personal Data on GRC's behalf are required to follow applicable law and GRC's instructions.
- b. In some cases, Personal Data may be accessible to certain persons involved with Services operation (administration, sales, marketing, legal, system administration) or

external parties (third-party service providers, mail carriers, hosting providers, IT companies, communications agencies).

c. GRC may disclose Personal Data to the following entities and for the listed purposes:

- i. Customers and authorized business partners – for providing Services
- ii. Employees – only authorized employees have access
- iii. Contractors and service providers – performing functions on GRC's behalf
- iv. To comply with legal process, protect company, or enforce rights
- v. As part of a merger or sale of business

4. Mode and Place of Processing Data:

- a. GRC takes appropriate security measures to prevent unauthorized access, disclosure, modification, or destruction of Personal Data.
- b. Processing is carried out using computers/IT tools, following organizational procedures related to the purposes indicated.
- c. GRC may process Personal Data if one of the following applies: consent, contract performance, legal obligation, public interest, or legitimate interest.
- d. GRC clarifies the legal basis of processing upon request.
- e. Personal Data is processed at GRC's operating offices and other locations where parties involved in processing are located.
- f. Data transfers may occur outside the User's country.
- g. Users are entitled to learn about the legal basis of international data transfers and safeguards.

5. Retention of Personal Data:

- a. Personal Data is stored as long as required by its collection purpose.
- b. Data collected for contract performance is retained until contract fulfillment. Some may be retained longer for legal obligations, disputes, agreements, or service improvement.
- c. Data collected for legitimate business interests is retained as needed.
- d. Data may be retained longer with User consent.
- e. Data may be retained longer to fulfill legal obligations.
- f. After retention, data is deleted or de-identified; if deletion isn't possible, data is isolated.

6. Rights of Users:

- a. Users may exercise rights regarding their Personal Data, with some limitations.
- b. Rights include: withdraw consent, object to processing, access data, correct data, restrict processing, delete data, data portability, and lodge a complaint.
- c. Users can object to processing for public interest or legitimate interest.
- d. Users can object to direct marketing; GRC does not process Personal Data for direct

marketing.

e. Requests can be made via GRC contact information.

7. Cookie Policy:

a. Users will receive a message about cookies. By accepting, they agree to GRC's use. Users can withdraw consent or block cookies, which may limit Services functionality. Third parties may also use cookies for analytics.

8. How "Do Not Track" Requests are Handled:

a. Services do not support "Do Not Track." Check third-party privacy policies for their practices.

9. Third Party Services:

a. Services may link to third-party websites or services. GRC is not responsible for their privacy policies or practices.

10. Information For Californian Consumers:

a. CCPA provides rights to California residents. See Schedule 2 (California Privacy Notice) for more information or contact GRC.

11. Minors and Children's Privacy:

- a. GRC does not knowingly collect data from children under 18.
- b. If data from minors is discovered, GRC will remove it. Parents/guardians may contact recoverycommunity@gatewayrehab.org to request removal.

12. Definitions:

- a. "Data Processor" – processes data on behalf of controller.
- b. "Data Subject" – person to whom data refers.
- c. "Usage Data" – information collected automatically (IP, browser, pages visited, etc.).
- d. "User" – individual using the Services.

13. Miscellaneous:

- a. Policy based on multiple legislations, including GDPR Art. 13/14.
- b. Users may request more details.
- c. Changes to this Privacy Policy: GRC may update at any time, indicate the last update date, provide notice for significant changes, and request renewed consent if needed.
- d. Contact Information:

i. Gateway Rehabilitation Center, Administrative Office, 311 Rouser Road, Moon Twp., PA 15108

ii. Email: recoverycommunity@gatewayrehab.org