

SKAALEN RETIREMENT SERVICES

NOTICE OF PRIVACY PRACTICES

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO SUCH INFORMATION. PLEASE REVIEW THIS NOTICE CAREFULLY.

We are committed to providing you with the highest quality of care in an environment that protects your privacy and the confidentiality of your protected health information. This notice of privacy practices (this "Notice") applies to Skaalen Retirement Services, Inc., Skaalen Nursing and Rehabilitation Center, Inc., Skaalen Retirement Services, RCAC, LLC, Skaalen Village, Inc. Vennevoll, Inc. and Skaalendal, Inc. (collectively, the "Skaalen Companies"), along with any health care facility, medical staff or other health care entity now or in the future controlled by or under common control of any of the Skaalen Companies (together, these entities along with the Skaalen Companies will be referred to as "Skaalen"). Skaalen has organized a health care arrangement ("OHCA") among the various entities referenced above. Being part of an OHCA allows each of the Skaalen affiliated entities to use and disclose your health information for the purposes related to their joint operations, including the provision of treatment, for payment purposes, and for a broad scope of healthcare operations, which may include joint utilization review, credentialing, education, risk management, patient safety, and quality assessment and improvement activities.

USE AND DISCLOSURE OF HEALTH INFORMATION

Skaalen may use information about you that constitutes protected health information ("PHI") as defined in the Privacy Rule of the Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), for purposes of providing you treatment, obtaining payment for your care and conducting health care operations. Skaalen has established a policy to guard against unnecessary disclosure of your PHI.

Skaalen must use and disclose your PHI to provide you with quality health care or as required by law. Health information that Skaalen discloses may no longer be protected once received by others, depending on who receives the PHI and the purpose for which it is being disclosed. Skaalen typically shares or uses your PHI in the following ways:

THE FOLLOWING IS A SUMMARY OF THE CIRCUMSTANCES AND PURPOSES FOR WHICH YOUR PHI MAY BE USED AND DISCLOSED:

To Provide Treatment: Skaalen may use your PHI to provide care to you and disclose your PHI to others who provide care to you, such as your attending physician and other health care professionals who are involved in your care. For example, physicians involved in your care will need information about your symptoms in order to prescribe appropriate medications. Skaalen also may disclose your health care information to individuals outside of Skaalen involved in your care including family members, pharmacists, suppliers of medical equipment or other health care professionals.

To Obtain Payment: Skaalen may include your PHI in invoices to collect payment from third parties for the care you may receive from Skaalen. For example, Skaalen may be required by your health insurer to provide information regarding your health care status so that the insurer will reimburse you or Skaalen. Skaalen may also need to obtain prior approval from your insurer and may need to explain to the insurer your need for health care and the services that will be provided to you.

To Conduct Health Care Operations: Skaalen may use and disclose PHI for its own operations in order to facilitate the function of Skaalen and as necessary to provide quality care to all of Skaalen's residents and patients. Health care operations include activities such as:

- Quality assessment and improvement activities.
- Activities designed to improve health or reduce health care costs.
- Protocol development, case management and care coordination.
- Contacting health care providers, residents and patients with information about treatment alternatives and other related functions that do not include treatment.
- Professional review and performance evaluation.
- Training programs including those in which students, trainees or practitioners in health care learn under supervision.
- Training of non-health care professionals.
- Accreditation, certification, licensing or credentialing activities.
- Review and auditing, including compliance reviews, medical reviews, legal services and compliance programs.
- Business planning and development including cost management and planning related analyses and formulary development.
- Business management and general administrative activities of Skaalen.
- Fundraising for the benefit of Skaalen and certain marketing activities.

For example, Skaalen may use your PHI to evaluate its staff performance, combine your PHI with other Skaalen residents and patients in evaluating how to more effectively serve all of Skaalen's residents and patients, disclose your PHI to Skaalen staff and contracted personnel for training purposes, use your PHI to contact you or your family as part of general fundraising and community information mailings (unless you tell us you do not want to be contacted for fundraising).

For the Facility Directory: Skaalen may disclose certain information about you including your name, your general health status, your religious affiliation and where you are located in a facility directory while you are at Skaalen. Skaalen may disclose this information to people who ask for you by name. However, religious affiliation will only be disclosed to clergy. You may object to Skaalen's use or disclosure of information about you for these reasons if you notify us of your objection.

If you do not want Skaalen to include your information in the directory, you must notify Kris Krentz, CEO at (608) 873-5651.

For Fundraising Activities: Skaalen may use information about you including your name, address and telephone number to contact you or your family to raise money for Skaalen Retirement Services Foundation, Inc. If you do not want Skaalen to contact you or your family for these purposes, you must notify Briana Curry, Privacy Officer, at (608) 873-5651 and indicate that you do not wish to be contacted. There will be no adverse consequences for you by doing so.

For Treatment Alternatives: Skaalen may use and disclose your PHI to tell you about or recommend possible treatment options or alternatives that may be of interest to you.

THE FOLLOWING IS A SUMMARY OF THE CIRCUMSTANCES AND PURPOSES FOR WHICH YOUR PHI MAY BE USED AND DISCLOSED WITHOUT YOUR WRITTEN CONSENT OR AUTHORIZATION:

When Legally Required: Skaalen will disclose your PHI when it is required to do so by any Federal, State or local law.

When there are Risks to Public Health: Skaalen may disclose your PHI for the following public activities and purposes:

- To prevent or control disease, injury or disability, report disease, injury, vital events such as birth or death and the conduct of public health surveillance, investigations and interventions.

- To report adverse events, product defects, to track products or enable product recalls, repairs and replacements and to conduct post-marketing surveillance and compliance with requirements of the Food and Drug Administration.
- To notify a person who has been exposed to a communicable disease or who may be at risk of contracting or spreading a disease.
- To an employer about an individual who is a member of the workforce as legally required.

To Report Abuse or Neglect: Skaalen is allowed to notify government authorities if Skaalen believes a resident or patient is the victim of abuse or neglect. Skaalen will make this disclosure only when specifically required or authorized by law or when the resident or patient agrees to the disclosure.

To Conduct Health Oversight Activities: Skaalen may disclose your PHI to a health oversight agency for activities required by law. This includes uses or disclosures in civil, administrative or criminal investigations; inspections; licensure or disciplinary actions (for example, to investigate complaints against providers); and other activities necessary for appropriate oversight of government benefit programs (for example, to investigate Medicare or Medicaid fraud). Skaalen, however, may not disclose your PHI if you are the subject of an investigation and the investigation does not arise out of and is not directly related to your receipt of health care or public benefits.

In Connection with Judicial and Administrative Proceedings: As permitted or required by State law, Skaalen may disclose your PHI in the course of any judicial or administrative proceeding in response to an order of a court or administrative tribunal as expressly authorized by such order or in response to a court ordered subpoena, discovery request or other lawful process, but only when Skaalen makes reasonable efforts to either notify you about the request or to obtain an order protecting your PHI.

For Law Enforcement Purposes: As permitted or required by State law, Skaalen may disclose your PHI to a law enforcement official for certain law enforcement purposes, including, under certain limited circumstances, if you are a victim of a crime or in order to report a crime, and for identifying or locating a suspect, fugitive, material witness or missing person.

To Coroners and Medical Examiners: Skaalen may disclose your PHI to coroners and medical examiners for purposes of determining your cause of death or for other duties, as authorized by law. Also, disclosure is permitted to funeral directors, consistent with applicable law, as necessary to carry out their duties with respect to the decedent.

For Research Purposes: Skaalen may, under very select circumstances, use your PHI for research. Before Skaalen discloses any of your PHI for such research purposes, the project will be subject to an extensive approval process.

In the Event of a Serious Threat to Health or Safety: Skaalen may, consistent with applicable law and ethical standards of conduct, disclose your PHI if Skaalen, in good faith, believes that such disclosure is necessary to prevent or lessen a serious and imminent threat to your health or safety or to the health and safety of the public.

For Special Government Functions.: In certain circumstances, the Federal regulations authorize Skaalen to use or disclose your PHI to facilitate specified government functions relating to the military and veterans, national security and intelligence activities, protective services for the President and others, medical suitability determinations and inmates in law enforcement custody.

For Worker's Compensation: Skaalen may release your PHI for worker's compensation or similar programs.

Authorization to use or Disclose Health Information: Other than what is stated above, Skaalen will not disclose your PHI other than with your written authorization. If you or your representative authorizes Skaalen to use or disclose your PHI, you may revoke that authorization in writing at any time, so long as the revocation is in writing. Once Skaalen receives your written revocation, it will only be effective for future uses and disclosures. It will not be effective for any information that may have been used or disclosed in reliance upon the written authorization and prior to receiving your written revocation.

YOU HAVE THE FOLLOWING RIGHTS REGARDING YOUR PHI THAT SKAALEN MAINTAINS:

Right to Request Restriction: You may request that the Skaalen restrict the uses and disclosures of your PHI. However, Skaalen is not required to agree to your request (except that Skaalen must comply with your request to restrict a disclosure of your confidential information for payment or health care operations if you paid for the services to which the information relates in full, out of pocket). If you wish to make a request for restrictions, please contact the Ana Thill, Health Information Manager, at (608) 873-5651.

Right to Receive Confidential Communications: Skaalen will accommodate reasonable written requests to receive communications of PHI by alternative means or at alternative locations if necessary to prevent a disclosure that could endanger you. If you wish to receive confidential communication, please contact Ana Thill, Health Information Manager, at (608) 873-5651.

Right to Inspect and Copy Your Health Information: You have the right to inspect and copy your PHI, including billing records. A request to inspect and copy records containing your PHI may be made to the Ana Thill, Health Information Manager, at (608) 873-5651. If you request a copy of your PHI, Skaalen may charge a reasonable fee for copying and assembling costs associated with your request. Requests need to be made during normal business hours (no holidays or weekends).

Right to Amend your Health Information: You or your representative have the right to request that Skaalen amend your records, if you believe your PHI records are incorrect or incomplete. That request may be made as long as the information is maintained by Skaalen. A request for an amendment of records must be made in writing to the Executive Director at Ana Thill, Health Information Manager, at (608) 873-5651. Skaalen may deny the request if it is not in writing or does not include a reason for the amendment. The request also may be denied if your PHI records were not created by Skaalen, if the records you are requesting are not part of Skaalen's records, if the PHI you wish to amend is not part of the PHI you or your representative are permitted to inspect and copy, or if, in the opinion of Skaalen, the records containing your PHI are accurate and complete.

Right to a Paper Copy of this Notice: You or your representative have a right to a separate paper copy of this Notice at any time even if you or your representative have received this Notice previously. To obtain a separate paper copy, please contact Ana Thill, Health Information Manager, at (608) 873-5651. A resident/patient or a resident's/patient's representative may also obtain a copy of the current version of Skaalen's Notice at its website: www.skaalen.com.

Right to an Accounting of PHI Disclosures: At your request, Skaalen will provide you with an accounting of disclosures by Skaalen of your PHI during the six years prior to the date of your request. However, such accounting will not include PHI disclosures made: (1) to carry out treatment, payment or health care operations; (2) to individuals about their own PHI; (3) pursuant to your authorization; and (4) where otherwise permissible under the law and Skaalen's privacy practices. In addition, Skaalen need not account for certain incidental disclosures. If the accounting cannot be provided within 60 days, an additional 30 days is allowed if the individual is given a written statement of the reasons for the delay and the date by which the accounting will be provided. If you request more than one accounting within a 12 month period, Skaalen will charge a reasonable, cost-based fee for each subsequent accounting. Such requests should be made to Ana Thill, Health Information Manager, at Skaalen Retirement Services, Inc. Attention Ana Thill, Health Information Manager, 400 North Morris Street, Stoughton, WI 53589.

Right to Notification of a Breach. You have the right to be notified following a breach of your unsecured PHI. Notification may be delayed or not provided if a law enforcement official determines that notification would impede a criminal investigation or threaten national security.

DUTIES OF SKAALEN:

Duties of Skaalen: Skaalen is required by law to maintain the privacy of your PHI and to provide to you and your representative this Notice of its duties and privacy practices. Skaalen is required to abide by the terms of this Notice as may be amended from time to time. Skaalen reserves the right to change the terms of its Notice and to make the new Notice provisions effective for all PHI that it maintains. If Skaalen changes its Notice, Skaalen will provide a copy of the revised Notice to you or your appointed representative. You or your representatives have the right to express complaints to Skaalen and to the Secretary of Health and Human Services if you or your representative believe that your privacy rights have been violated. Any complaints to Skaalen should be made in writing to the Kris Krentz, CEO at Skaalen Retirement Services, Inc., 400 North Morris Street, Stoughton, WI 53589. Skaalen encourages you to express any concerns you may have regarding the privacy of your information. You will not be retaliated against in any way for filing a complaint.

Contact Person: Skaalen has designated Briana Curry, Privacy Officer, as its contact person for all issues regarding resident/patient privacy and your rights under the Federal privacy standards. You may contact this person at 400 North Morris Street, Stoughton, WI 53589 or by phone at (608) 873-5651.

This Notice is effective June 17, 2026. If you have any questions regarding this Notice, please contact the Kris Krentz, CEO at (608) 873-5651.