

PRIVACY POLICY



A Graceful Transition to Senior Living, LLC

Oregon DHS Registered Long-Term Care Referral Agent

Last Updated: December 13, 2025

1. WHO WE ARE

A Graceful Transition to Senior Living, LLC ("A Graceful Transition," "we," "our," or "us") is a long-term care referral agency registered with the Oregon Department of Human Services (DHS).

We provide referral, education, and consultation services to assist seniors and their representatives in identifying appropriate housing and care options when independent living is no longer safe or suitable.

We do **not** provide medical, legal, or financial advice, nor do we make placement decisions on behalf of clients.

2. PURPOSE OF INFORMATION COLLECTION

We collect and use personal information only **as necessary** to assess senior care needs, identify appropriate licensed care options, facilitate referrals at the client's request, and support informed decision-making:

All decisions regarding care selection remain solely with the client and/or the designated representative.

3. INFORMATION WE COLLECT

During intake and referral services, we collect limited, **relevant information, including** name, phone number, email address, and mailing address.

We will collect care-related information, including functional needs, mobility and safety considerations, cognitive or memory concerns, and assistance needs with activities of daily living.

We collect financial information regarding the budget range relevant to care affordability. We do not collect banking, credit card, or investment account information.

We maintain records related to conversations and referrals in the form of email or written correspondence directly related to services provided. We do not collect information unrelated to senior care referral purposes.

4. HOW INFORMATION IS USED

Information is used exclusively to identify suitable senior living or care facilities, communicate referral information to licensed providers, respond to client inquiries, and maintain records required by Oregon DHS.

We do **not** use personal information for targeted advertising, behavioral profiling, data resale, or unrelated marketing purposes.

5. SHARING & DISCLOSURE OF INFORMATION

Personal information is treated as confidential and shared **only with authorization and only as necessary**.

Authorized Disclosure

With client authorization, information may be shared with Assisted Living facilities, Residential Care facilities, Adult Care Homes, Memory Care communities, Intermediate Care facilities, and Independent Living communities.

Information is shared solely with **medical or care-related entities** for referral evaluation purposes.

No Sale of Personal Data

A Graceful Transition does not sell personal information.

6. REFERRAL FEES & TRANSPARENCY.

Some licensed senior living facilities pay A Graceful Transition a referral fee when a client moves in. Clients are **never charged** fees for our services. Referral fees do **not** affect care recommendations. Some referrals may be **pro bono** if we refer a community with whom we do not have a referral contract. We hold **no ownership interest** in any facility.

7. CLIENT RIGHTS UNDER OREGON LAW.

Under the **Oregon Consumer Privacy Act (OCPA)**, Oregon residents have the right to access their personal information, request correction of inaccurate information, request deletion of personal information, subject to legal record-keeping requirements, obtain a copy of their information, and opt out of the sale of personal data (*we do not sell data*).

Requests may be submitted using the contact information below. We do not retaliate or discriminate against clients for exercising these rights.

8. DATA SECURITY.

We maintain reasonable administrative and organizational safeguards appropriate to the size and nature of our business, including limited access to client information, secure storage of electronic and physical records, and use of trusted service providers.

No electronic transmission or storage system can be guaranteed 100% secure.

9. DATA RETENTION.

Client information is retained only as long as necessary to provide referral services, meet DHS documentation requirements, and comply with applicable Oregon laws.

Information is securely disposed of when no longer required.

10. POLICY UPDATES.

This Privacy Policy may be updated periodically. Any updates will be posted on AGracefulTransition.com with a revised “Last Updated” date.

11. CONTACT INFORMATION

For questions, privacy requests, or concerns:

A Graceful Transition to Senior Living, LLC

Owner/Operator: LaVona Tomberlin

DHS Registration No.: 1258

Phone: 971-378-3474

Email: agtransition.lvt@gmail.com

Address:

100 SW 195th Ave #26

Beaverton, OR 97006

Business Transfers

If we are involved in a merger, acquisition, asset sale, or bankruptcy, your personal information may be transferred as part of that transaction.

YOUR RIGHTS UNDER OREGON LAW (OCPA)

Under the Oregon Consumer Privacy Act (OCPA), Oregon residents have the right to:

Right to Access

Request confirmation of whether we process and access your data.

Right to Correct

Request corrections to inaccurate personal information.

Right to Delete

Request the deletion of personal information we have collected about you.

Right to Data Portability

Request a copy of your personal information in a portable format.

Right to Opt-Out

You may opt out of any information we share.

Submitting a Request

To exercise any of these rights, contact us using the information provided in the [Contact Us](#) section. We will not discriminate against you for exercising your rights.

COMMUNICATION PREFERENCES

You may opt out of communications anytime by following the unsubscribe instructions or contacting us directly.

DO NOT TRACK

AGracefulTransition.com currently does not respond to “Do Not Track” browser signals.

DATA SECURITY

We use commercially reasonable administrative, technical, and physical safeguards to protect your data. However, no method of electronic transmission is 100% secure, and we cannot guarantee absolute protection.

DATA RETENTION

We retain personal information only as long as needed to fulfill the purposes outlined in this policy, unless a more extended period is required or permitted by law.

THIRD-PARTY LINKS

Our website may include links to third-party websites. We are not responsible for their content or privacy practices.

COOKIES & SIMILAR TECHNOLOGIES

We use cookies and similar technologies to improve website performance and enhance user experience. You can adjust your cookie settings in your browser.

CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. The “Last Updated” date will reflect the most recent version. We encourage regular review of this page.