

Data Privacy Policy- Website

This Website consent, acknowledgement, and data privacy policy (the “Site Acknowledgement” or “Acknowledgement”) of Senior Lifestyle and its affiliates (“Company,” “we,” “us,” or “our”) describes our privacy practices regarding personal information we collect, including from persons (“you” or “your”) who access our Website (collectively, the “Site”).

PURPOSE. The purpose of this Acknowledgement is to inform you about the types of personal information we gather about you, including personal information gathered when you visit the Site, and personal information we may receive from third parties or affiliates in addition to that online information, how we may use that information, whether we disclose that information to anyone, and the choices you have regarding our use of, and your ability to correct, the information. This Acknowledgement does not cover information that is exempted from privacy notification requirements, including information about employees, contractors, job applicants and information processed exclusively in the context of a business person acting in a business capacity.

YOUR CONSENT AND ACKNOWLEDGEMENT CHANGES. PLEASE READ THIS ENTIRE ACKNOWLEDGEMENT CAREFULLY. BY USING THE SITE, YOU EXPRESSLY CONSENT, WITHOUT QUALIFICATION, TO THE COLLECTION, USE, AND DISCLOSURE OF INFORMATION, INCLUDING PERSONAL INFORMATION, AS DESCRIBED IN THIS ACKNOWLEDGEMENT. IF YOU DO NOT AGREE TO THE TERMS OF THIS ACKNOWLEDGEMENT, YOU ARE NOT AUTHORIZED TO USE THE SITE.

Company may amend this Acknowledgement from time to time. We will post those changes on the website. In certain cases, you may be notified via email or by a notice on our website.

PERSONAL INFORMATION COLLECTED IN THE PAST 12 MONTHS. We may collect, process, and store various types of Personal Information. For purposes of this Acknowledgement, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. It does not include de-identified or aggregate information, or public information lawfully available from governmental records.

Personal Information we collect may include: your name, email addresses, postal addresses, postal codes, user Internet Protocol (IP) addresses, social security/insurance number, driver’s license number, prior addresses, monthly rent paid at prior residences, employers, job titles, income, telephone numbers, credit card information, bank account information and routing numbers, date of birth, gender, age, marital status, user name and password (if you choose to become a registered user of the Site or our products and services), emergency contact information, information about your pets, information about your vehicles including license plate numbers, and other information either desirable or necessary to provide quality services to our residents and visitors. We may also collect information about you such as your use of the Site and communication preferences.

We do not and will not sell your Personal Information.

INFORMATION DISCLOSURE. We may disclose the information we collect from and about you (1) to our business partners, if the disclosure will enable them to perform a business, commercial, professional, or

technical support function for us; (2) as necessary if we believe that there has been a violation of our rights or the rights of any third party; (3) to respond to judicial process or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; and (4) as described to you at the point of collection.

ADDITIONAL INFORMATION ABOUT HOW WE COLLECT AND SHARE YOUR PERSONAL INFORMATION.

With respect to each of the categories of data above, we may also collect and share Personal Information with third parties to comply with legal obligations; when we believe in good faith that an applicable law requires it; at the request of governmental authorities or other third parties conducting an investigation; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of our business, third parties, visitors to our websites and mobile apps, or the public. We may also share Personal Information with any person to whom we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

USE OF COOKIES AND OTHER TECHNOLOGIES. Like many other website operators, Company may use cookies, pixel tags, or other technologies to automatically or passively collect certain information to customize content specific to your interests and track your use of the Site. “Cookies” are text files that are placed on your computer and may be used to store your Personal Information. Cookies may be stored on your computer when you visit our website. These cookies provide statistical data that may help us to improve our Site and deliver better and more customized services. “Pixel tags” are tiny graphic images on that help us analyze customer online behavior and measure the effectiveness of our website and advertising. In addition to cookies and pixel tags, Company may use other now known or later developed technologies, to assist Company in observing the behavior of users visiting the Site. This Site may use Lead Attribution or Marketing Attribution to assess the conversions of different channels that generate leads. These technologies access individual user information but the information is used only to compile aggregated statistics about the Site’s usage.

We also work with third-party business partners that use tracking technologies to deliver advertisements on our behalf both online and offline. These companies may collect information about your visits to our website and your interaction with our advertising and other communications. This Site may use Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. (“Google”), to better assist Company in understanding how the Site is used. Google Analytics may place cookies on your computer that will generate information that we select about your use of the Site, including your computer’s IP address. That information will be transmitted to and stored by Google. The information will be used for the purpose of evaluating consumer use of the Site, compiling reports on Site activity for Company’s use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. The use of cookies by Google Analytics is covered by Google’s Acknowledgement: <https://www.google.com/policies/privacy/>. If you wish to prevent your data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on available at <https://tools.google.com/dlpage/gaoptout/>.

You can choose to delete existing cookies, allow or block cookies, and set preferences for certain websites in your browser's settings. When you opt out through one of these websites, an "opt-out" cookie is stored in your web browser indicating that you do not want to receive targeted advertisements. If you delete cookies generally, you will need to opt out again. Even if you opt out, you still may receive advertising from us that is not customized based on your service or usage information, or advertising from other third parties. Please note you may not be able to use the full functionality of the Site if you choose to block all cookies.

APPLICABLE LAWS AND REGULATIONS. Additional federal, state, and local laws and regulations, such as California Consumer Privacy Act (CCPA), may apply. You may take advantage of the following rights:

1. You may request, up to two (2) times each year, that we disclose to you the Personal Information that we have collected about you, the categories of sources from which your Personal Information is collected, the business or commercial purpose for collecting your Personal Information, the categories of Personal Information that we disclosed for a business purpose, any categories of Personal Information that we sold about you, the categories of third parties with whom we have shared your Personal Information, and the business or commercial purpose for selling your Personal Information, if applicable.
2. You may request that we delete any Personal Information that we have collected from or about you. Note that there are some reasons we will not be able to fully address your request, such as if we need to complete a transaction for you, to detect and protect against fraudulent and illegal activity, to exercise our rights, or to comply with a legal obligation.
3. You can make a request for disclosure or deletion.

To take advantage of any of these rights, you may contact us by email at DataRemoval@seniorlifestyle.com.

In each case, we may need to request additional information from you for verification purposes. We value your privacy and will not discriminate in response to your exercise of your privacy rights. We will respond to your request within the timeframe required by the applicable law, after proper verification, unless we need additional time, in which case we will let you know.

For purposes of compliance with applicable law, in addition to the further details as described throughout this Acknowledgement, we make the following disclosures:

1. We collect the following categories of Personal Information: Identifiers/Contact Information, characteristics of protected classifications under state or federal law, payment card information associated with you, commercial information, Internet or other electronic network activity information, and inferences drawn from the above.
2. We disclose the following categories of Personal Information for a business purpose: Identifiers/Contact Information, characteristics of protected classifications under state or federal law, payment card information associated with you, commercial information, Internet or other electronic network activity information, and inferences drawn from the above.

EMAIL AND TEXT MANAGEMENT. If you provide your email address or phone number, you may receive emails, calls, and/or texts from Company for a variety of reasons. We respect your desire to manage email and text correspondence. If you have an account with Company on the Site, you can select your preferences through your account settings. You can also manage your receipt of certain types of communication by following the instructions included in the email we send you. Please note that, even if you unsubscribe from certain email correspondences, we may still need to email you with information relating to your unit, the management of the property, and other important transactional or administrative information.

THIRD-PARTY WEBSITES. This Acknowledgement applies solely to information collected by Company. This Acknowledgement does not apply to other websites that are accessible through this Site, including but not limited to any third-party websites. Third party sites have separate and independent privacy policies; therefore, we have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

ACCESSING, REVIEWING AND CHANGING YOUR CONTACT INFORMATION. This Site may offer you an individual account, as an account holder, you can see, review, and change most of your contact information associated with your Account Profile by logging into your account and editing your Account Profile. With some exceptions, you may have the right to see what Personal Information we hold about you. We may be able to help you identify what records we might have about you. We may need to confirm your identity before providing you with this access, and if we cannot verify your identity with the degree of certainty required, we will not be able to respond to your request. If we cannot give you access, we will tell you within forty-five (45) days of receipt of your request and provide you with a reason, as best we can, as to why we cannot give you access. For assistance, please contact us by email at DataRemoval@seniorlifestyle.com.

Do Not Track. “Do Not Track” is a privacy preference that users can set in certain web browsers. We may not respond to browser or do not track signals.

ACCESSIBILITY. We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us by email at DataRemoval@seniorlifestyle.com.

CONTACTING US. If you have questions regarding this Acknowledgement or use of information collected, please contact us by email at DataRemoval@seniorlifestyle.com.