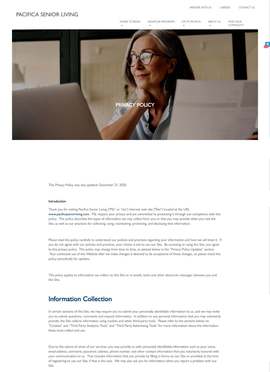

PRIVACY POLICY

The Privacy Policy was last updated: December 31, 2020.

Introduction

Thank you for visiting Pacifica Senior Living, LLC or "we" (interest web site ("Site") located at the URL: **www.pacificaseniorliving.com**. PSL respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes the types of information we may collect from you or that you may provide when you visit the Site as well as our practices for collecting, using, maintaining, protecting and disclosing that information.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to visit the Site. By accessing or using the Site, you agree to this privacy policy. This policy may change from time to time, as described in the "Privacy Policy Updates" section. Your continued use of the Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

This policy applies to information we collect on this Site or in emails, texts and other electronic messages between you and this Site.

Information Collection

In certain sections of the Site, we may require you to submit your personally identifiable information to us, and we may review, use, and disclose your information as described in this privacy policy. We may also use your information to contact you and to provide the Site collections of information using cookies and other third-party tools. Please refer to the sections below on "Cookies" and "Third Party Analytics Tools" and "Third Party Advertising Tools" for more information about the information these tools collect and use.

Due to the nature of some of our services, you may provide us with personally identifiable information such as your name, email address, username, password, address, phone number and other contact information that you voluntarily transact with us when you register for the Site, when you subscribe to our newsletter, when you fill out a form, when you make a purchase, when you post a comment, when you participate in our operating system services, Hardware model, IPEM number and other unique device identifiers, MAC address, and device settings, device event information, and crash data. That is about you but individually identifies you, such as your IP address, browser type, domain name, page views, and the web sites you visit just before and after this site, and other anonymous usage information such as whether you have subscribed to our Internet Web Site or other services, actions you have taken in connection with your use of the Site. We automatically collect log data when you access and use the Site, even if you have not created an account or logged in.

Cookies

We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "Help" file.

On this Site, we use session cookies to make it easier for you to navigate this Site by remembering your login preferences and to improve and track the overall performance of our Site. For this, we set a persistent cookie to authenticate your login and authentication to the site services. Persistent cookies enable us to track, store and target the interests of our users to enhance the experience on our Site. If you reject cookies, you may still use this Site, but your ability to use some areas of the Site may be limited.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

Third Party Analytics Tools

Beyond this personally identifiable information you voluntarily provide to us directly, we utilize analytics tools including third party technologies such as Google Analytics to collect information setting cookies. Certain types of information, including geolocation, device type, screen resolution usage and behavior, demographic data, and purchase history, is collected and aggregated across PSL Site users for our analysis and advertising efforts.

Third Party Advertising Tools

We use Google Analytics and Google Ads and other types of technologies to display relevant advertisements to users who have previously visited the Site. Retargeted or remarketing or retargeting, we may utilize previous session information to display PSL advertisements on other sites on the internet. Retargeting technology uses your previous visits to our site and your interests to advertise on the Google Display Network. Third parties vendors such as Google may display PSL ads on website across the Internet. Aggregated user data may be utilized to create remarketing/retargeting "lists," or groups of users with similar interests or demographics. We also use Google tools to display advertisements to users based on their relevant interests and demographics.

Users may learn more about Google's use of cookies by visiting the Google Privacy and Terms page at https://policies.google.com/privacy. Users may also opt out of Google's use of cookies by visiting the Google ads preferences settings or your browser. Complaints about the Google Analytics system operation and use are available at https://support.google.com/adsense/troubleshooter/1631?hl=en#ts=1626447,1626449 Opting out of user interest and demographic categories in the Settings for Google Ad Personalization, Google Display Network Impressions, and Google Analytics Advertising Features will not stop seeing active multiple campaigns in the US-based Network Advertising Initiative at http://www.networkadvertising.org/choices/.

Aggregate Information

We may collect and keep track total number of visitors to the Site, the number of visitors to each page of the Site, Internet Protocol (IP) addresses, and browser and operating system information. We may use this information for our own internal trends and statistics in the aggregate but such information will not be associated with your data and is aggregate form only and it will not contain personally identifiable information. We may use such information for purposes such as analyzing trends, administering the Site, and to understand how users interact with the Site.

Disclosure of Personally Identifiable Information

We may provide your personally identifiable information to our affiliated companies for customer and third party analytics tools and the aggregate information to our vendors and service agencies that we may engage to assist us in providing our services to you. For example, we may engage with Google Analytics to assist us with Retargeting to reach out to existing users.

We will disclose your personally identifiable information if we reasonably believe we are required to do so by law, regulation or other governmental authority or to assist in any investigation, to protect our or our users' rights or to enforce our terms of use. We will not sell your personally identifiable information to any company or organization except we may transfer your personally identifiable information to a successor in interest in the event of a merger, joint venture, consolidation, or other similar event. PSL participates in an exchange of our substantial all of PSL's assets, or in the event of a bankruptcy, we may transfer aggregated information about our users, which means information that does not identify any individual, without restrictions. Disclosure would be also necessary or appropriate to protect the rights, property or safety of PSL, our customers or others.

Links to Third Party Sites

The Site may provide links to other Web sites or resources over which PSL does not have control ("External Web Sites"). Such links do not constitute an endorsement by PSL of those External Web Sites. You acknowledge that we are providing these links to you only as a convenience, and further agree that we are not responsible for the content of such External Web Sites. Your use of them is subject to the terms of use and privacy policies found on the linked to External Web Sites.

Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All personally identifiable information we gather is stored behind firewalls and is reasonably designed to help protect your personally identifiable information from loss, unauthorized access, disclosure, alteration or destruction. PSL may use, without limitation, firewalls, password protection, secure socket layer, and other security measures to help prevent unauthorized access to your personally identifiable information.

Emails with Promotional Offers

If you do not wish to have your email address or contact information used to promote PSL products or services, you can opt-out by sending us an email that you unsubscribe. If you may send us a return email stating to be omitted from future email distributions.

Children under the Age of 16

The Site is not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the Site. We do not knowingly collect personally identifiable information from children under 16 years of age. If we learn we have collected or posted only information on this Site from a child under 16 years of age on this Site, it will be deleted or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16 years of age, please contact us at **privacypolicy@pacificaseniorliving.com**. We encourage parents and legal guardians to monitor their children's Internet usage and help enforce this policy by instructing their children never to provide information on the Site without their permission. We recommend that parents visit, for more information about the Children's Online Privacy Protection Act ("COPPA") and other ways to ensure their children's safety online, at the Federal Trade Commission's Internet site, at http://www.ftc.gov/bcp/conline/pubs/tipsadvice/index.html.

Privacy Notice for California Residents

This section supplements the information provided in the Privacy Policy above and applies only to visitors and users who are residents of the state of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in CCPA have the same meaning when used in this Policy.

If you have questions or concerns about any of the information provided in this Privacy Notice for California Residents, please contact us using the information provided in the "Contact Us" section of the Privacy Policy below.

Personal Information We Collect

For purposes of this section "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.

Personal information does not include:

- information that is lawfully made available from federal, state, or local government records;
- de-identified or aggregated consumer information;
- information covered under the privacy provisions of the California Consumer Privacy Act of 2018 ("CCPA") such as health or medical information covered under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and clinical information covered under the Cut-Glass Reporting Act ("CGRA") or Gramm-Leach-Bliley Act ("GLBA").

In particular, within the last twelve (12) months, this Site has collected the following categories of personal information as described in the table below:

Category	Examples	Collected
1. Identifiers.	Real name (such as first name and last name), alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	No.
2. Customer Records Information	Name, signature, Social Security number, physical characteristics or descriptions, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	No.
3. Protected classification characteristics under California or federal law.	Age (forty (40) years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression), pregnancy or childbirth and related medical conditions, sexual orientation, veteran or military status, genetic information (including familial genetic information), medical conditions, political activities or affiliations, ethnicity, religious or political activities, sexual, or orientation.	No.
4. Commercial information.	Records of products or services purchased, personal property, or other purchasing or consuming histories or tendencies.	No.
5. Biometric information.	Fingerprints, facial or hand imagery, voice recordings, keystroke patterns or rhythms, gait patterns or rhythms, exercise patterns, gait patterns, sleep, health, or exercise data.	No.
6. Internet or other similar network activity information.	Browsing history, search history, information regarding a consumer's interaction with a website, application, or advertisement.	No.
7. Geolocation data.	GPS coordinates or other location tracking information.	No.
8. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No.
9. Professional or employment-related information.	Employer, employment history, courses and CVs, background checks, and other employment-related information.	No.
10. Education information	Records maintained by an educational agency or institution that pertain to a student, such as grades and transcripts.	No.
11. Inferences.	Inferences drawn from any of the categories described above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No.

The table below describes the sources for each category of personal information we collected, the business and/or commercial purpose(s) for which we collect each category of personal information, and the third parties with whom we share each category of personal information we collect.

Category	Sources	Business or Commercial Purposes	Third Parties Shared With
1. Identifiers.	• Directly from consumers. • Website cookies. • Website analytics providers.	• To fulfill specific consumer requests. • To enhance the website experience. • For marketing purposes.	• Website providers. • Analytics providers. • Advertising providers. • Telephone service providers.
2. Customer Records information	N/A	N/A	N/A
3. Characteristics of protected classifications under California or federal law.	N/A	N/A	N/A
4. Commercial information.	N/A	N/A	N/A
5. Biometric information.	N/A	N/A	N/A
6. Internet or other similar network activity information	• Website cookies. • Website analytics providers.	• To fulfill your request. • For internal training purposes. • For analytics. • To enhance the website experience. • For marketing purposes.	• Telephone service providers. • Website providers. • Analytics Providers. • Advertising providers.
7. Geolocation data.	• Directly from consumers. • Website cookies. • Website analytics providers. • Advertising providers.	• To fulfill your request. • To enhance website traffic. • For marketing purposes.	• Website providers. • Analytics Providers. • Advertising providers.
8. Sensory data.	• Recorded phone calls.	• To assess the propriety of a caller to become a resident.	• Telephone service providers. • Analytics providers.
9. Professional or employment-related information	N/A	N/A	N/A
10. Education information	N/A	N/A	N/A
11. Inferences.	• Website analytics providers. • Advertising providers.	• For marketing purposes.	• Analytics Providers. • Advertising providers.

Personal Information We Disclose

- Sale of Personal Information

We do not sell personal information.

- Disclosure of Personal Information for Business Purposes

We disclose the following categories of personal information for business purposes: identifiers, biometric information, internet or other similar network activity information, geolocation data, and inferences.

We do not sell personal information of minors under the age of sixteen (16) years of age without affirmative authorization.

Your Rights

If you are a resident of California, you have specific rights regarding your personal information.

This section describes your rights and how to exercise them.

- Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that PSL disclose to you what personal information we collect, use, disclose, and sell. You may exercise this right following the instructions described under the subsection "Exercising Your Rights" below.

- Right to Delete Personal Information

You have the right to request that PSL delete personal information we may hold about you. You may exercise this right following the instructions described under the subsection "Exercising Your Rights" below.

Please be aware that we may not be able to delete some personal information. For example, there may be business or operational reasons why we need to retain personal information. If we deny your request to delete personal information, we will inform you of the basis for our denial in our response to you.

- Right to Opt-Out of Sale of Personal Information

You have the right to opt-out of the sale of your personal information. At the time of this policy PSL do not sell the personal information.

- Right to Non-Discrimination

You have the right to not receive discriminatory treatment from PSL for exercising one of your rights described under this "Your Rights" section. This means we will not treat you differently for exercising one of the rights described above.

Exercising Your Rights

You may exercise each right once every twelve (12) months. To exercise your rights, you must submit a verifiable request to us. To submit a verifiable request, please send an email or call at the email address or phone number identified in the "Contact Us" section.

To verify your request we may request the consumer to provide certain pieces of information for identity verification. You may designate an authorized agent to submit a request on your behalf. You may designate a person with general power of attorney or a natural person or a business entity registered with the Secretary of State of California to act on your behalf. We may require the consumer to provide proof of such designation. The person requested to act on your behalf or provide your personal information must be current with your identity or authority to make the request and confirm the personal information relates to you.

You should also describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact PSL at the email address or phone number identified in the "Contact Us" section. We will respond to your request within forty-five (45) days of its receipt. If we need more time (up to forty-five (45) days), we will inform you of the reason and extension period in writing. If we cannot fulfill your request within 45 days, we may extend an additional two (2) months (up to a maximum of ninety (90) calendar days) to complete your request.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warranty a fee, we will let you why we made that decision and provide you with a cost estimate before completing your request.

Financial Incentives

We do not offer financial incentives or price or service differences in exchange for the retention or sale of personal information.

Notice to Users Located Outside The United States

This Site and the services on this Site are targeted for users in the United States of America only. Any information you enter on the Site may be transferred outside of your home country to the United States of America, which may not offer an equivalent level of protection to the required of your home country's data protection laws.

Privacy Policy Updates

We may revise or update this Privacy Policy from time to time. If we, we will post its updated Privacy Policy on the Site along with a notice that the Privacy Policy has been updated. If we make material changes to how we treat our users' personal data, we will notify registered users of our service by notice that the Privacy Policy has been changed. We encourage you to review the Privacy Policy regularly for any changes. Your continued use of the Site and/or services and/or your continued provision of personally identifiable information to us after the posting of such notice will be subject to the terms of the then-current Privacy Policy.

Contact Us

If you have any questions or comments regarding this Privacy Policy, please contact us via email at **privacypolicy@pacificaseniorliving.com**.

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