

Cookie Notice: Cookies consist of portions of code installed in the browser that assist the website owner in providing the website services according to the purpose described. This website stores Cookies on your computer. Some of the purposes for which Cookies are installed may also require your consent. These Cookies are used to collect information about how you interact with our website and allow us to remember you. We use this information in order to improve and customize your browsing experience and for analytics and metrics about our visitors both on this website and other media. You accept the use of Cookies by closing or dismissing this notice, by clicking a link or button or by continuing to browse this website. If you decline to accept the use of Cookies, your information won't be tracked when you visit this website. A single cookie will be used in your browser to remember your preference not to be tracked.

PRIVACY NOTICE

WellQuest Living, LLC, together with its family of senior housing facilities, including Pacific Highlands and Carmel Village (the "Company", "we", "us", "our") understands that you care about how we collect, use, and share information when you interact with our websites, online services, applications, and business operations and services (our "Services" or "Site(s)"). This Privacy Notice (the "Privacy Notice" or "Notice") explains how the Company collect, use, share, and protect information in connection with the Sites that refer or link to this Privacy Notice. This Notice explains:

- the types of information we collect about you through our websites, online services as well as from third party sources and offline in connection with our Services;
- how we use and protect that information;
- the types of information we may share with others and under what circumstances;
- the rights you have regarding our data handling practices;
- our security practices related to your information; and
- other practices related to the handling of personal information.

By using our Services and/or submitting personal information to our Sites, you are accepting and consenting to the practices and uses described in this Privacy Notice. This Privacy Notice is not a contract.

When This Privacy Notice Applies

This Privacy Notice applies to any information we collect when you interact with us through social media or other websites and online services, as well as to information that we collect offline (e.g., via paper or telephone call) and combine with information collected on our Sites. It does not apply to non-Company, websites and mobile applications that may link to or be linked from our Sites. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

This Privacy Notice does not apply to "personal financial information," such as card or Services account information, payment history, and account balance, or "protected health information" such as medical records, even if we collect such information through our Sites or offline.

We may make changes to this Privacy Notice from time to time. We will post any changes to www.wqliving.com and the websites for our family of senior living communities. Such changes will become effective when they are posted. Your continued use of our Sites and

Services following the posting of any changes will mean you accept those changes.

Information We Collect From or About You

Below we describe the different types of information we collect from you, including from the devices you use, when you interact with our Sites and/or take advantage of our Services.

Information You Give Us: We collect and maintain personal information about you from many sources to understand and meet your needs, provide our Services, manage our business, and for other purposes disclosed to you. We collect and store any information you enter on our Sites, provide to us in written form, or communicate to us verbally. This may include:

- Personal identifiers such as your name, address, email address, account name, social security number, driver's license number, passport number, etc.
- Personal or physical characteristics protected by federal or state law, such as gender, race, ethnicity, age, etc.
- Biometric information
- Audio, electronic, visual, or similar information
- Additional information, as necessary

This information may also include information you provide during a registration/sign-up process, including account numbers or other identifiers needed to link to your bank account.

We also collect personal information that you submit to us when applying for a job via one of our Sites (including any CV or résumé that you upload to the website) and, if you are hired, information regarding your employment, performance, and other employment related information. This information will be collected and processed, where permissible by relevant, applicable law. This includes without limitation:

- Recruitment information - cover letter, resume, educational background, professional background, sex/gender, date of birth, ethnicity, nationality;
- Career and job performance information - job level/position, details of skills and experience from the referrals provided;
- Background check information, including information about judicial disputes and criminal records;
- Information publicly available, including information about you from publicly available social media profiles, such as content from external job bulletin boards; and
- Employee Personnel File, if you are hired as an employee, including information collected and maintained during your period of employment and for a period after your period of employment terminates.

Information Collected Automatically: When you interact with our Sites, certain information is automatically collected. This information includes computer and connection information, such as statistics on your page views, traffic to and from our Sites, referral URL, ad data, your IP address, and device identifiers. This information also may include your transaction history, and your web log

information, how you search for our Sites, the websites you click on from our Sites or emails, whether and when you open our emails, and your browsing activities across other websites.

Much of this information may be collected through Cookies, web beacons, and other tracking technologies, as well as through your web browser or device (e.g., IP address, MAC address, browser version, etc.). Most web browsers automatically accept Cookies but, if you prefer, you can usually modify your browser setting to disable or reject Cookies. If you delete your Cookies or if you set your browser to decline Cookies, some features of our Sites may not be available, work, or work as designed.

Location Information: When you interact with our Sites, we may collect information about your location and your device. Some of this information may be general, such as the state or city associated with your zip code, while some of this information may be more precise, such as information associated with your mobile device. Location information allows us to provide location-based services such as showing you directions to one of our locations. Most mobile devices allow you to control or disable the use of precise location services globally or per application in the device's settings menu.

Information from Social Media and Third Party Services: When you connect to, authenticate through, or interact with us or our Sites using a social media platform (such as by clicking on a social media icon linked from our Sites, or on a link to our Sites) or third party service (such as a Google account), we may collect information, including personal information, available through the service or the service's application programming interfaces (APIs). This information may include your name, account ID or username, contact details, email address(es), information related to your contacts, calendars, location information, profile picture, the contents of your posts or other communications, and other information the platform or third-party service makes available. If you choose to log in to your account with or through a social networking service or third-party service, we and that service may share certain information about you and your activities. You should check your privacy settings on these platforms and third party services to understand what information is made available to us, and you may be able to change the settings for these platforms or services to prevent, limit or otherwise control the information made available to us.

Information related to Minors: The Company does not knowingly collect information directly from minors—persons under the age of 16, or another age as defined by law—via our Sites or offline, other than when required to comply with the law or for safety or security reasons.

If you are a parent or guardian of a minor who has provided information without your knowledge or consent, you may submit a request to remove the minor's information by calling Customer Service at (385) 775-5581 or emailing us at Info@wqliving.com

How We Use Information We Collect From or About You

We may use information you give us or information we collect about you to:

- Communicate with you, including to respond to your inquiries and fulfill your requests;
- Provide, maintain, personalize, optimize, and improve our Sites, including research and analytics regarding use of our Sites, social media platforms and third-party services, or to remember you when you leave and return to our Sites;
- Provide and improve our products and services, including to provide you with online account management tools, services, to process any transactions you request, or to authenticate your identity;
- Deliver advertising, including interest-based advertising on our Sites and other websites and applications;
- If applicable, evaluate your application for employment with the Company, communicate with you about your application, conduct any necessary or appropriate background checks, comply with our diversity policy, manage any aspects of your prospective employment relationship with the Company and verify personal information by contacting your references;
- Comply with legal, regulatory or fiscal obligations; and
- Detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- Share your information at your direction or request, or when you otherwise consent.

We may combine information that you provide to us or information that we collect automatically with other information we obtain from our business records, including your use of websites and applications or purchase of products and services provided by the Company and, where applicable, your preferences and other personal characteristics. We also may use or combine information that we collect with information we obtain from third parties, including demographic information and other attributes, such as census data, purchasing data, demonstrated interests, loyalty programs, organizational affiliations and customer lists. Additionally, information collected from a particular browser or device may be used with another computer or device that is linked to the browser or device on which such information was collected.

Cookies, Tracking and Interest-Based Advertising

The help function of your browser should contain instructions on how to set your computer to accept all cookies, to notify you when a cookie is issued or to not receive cookies at any time. If you set your device to not receive cookies at any time, certain personalized services cannot be provided to you, and accordingly, you may not be able to take full advantage of all of our features.

The Company uses the information you make available to us when you interact with our Sites to provide you with advertising and offers that are more relevant to you. We partner with third party advertising companies to provide advertisements on our Sites, as well as on other websites and applications about our products and services that may be of interest to you. Some of our Sites may also include advertisements for unaffiliated products and services. The advertisements you see may be based on information collected through Cookies, web beacons and other tracking technologies from our Sites

and on other third-party websites you visit and mobile applications you use that participate in our advertising networks. These third parties may use persistent identifiers to track your Internet usage across other websites and mobile applications in their networks beyond our Sites. While the Company will not share information that personally identifies you with unaffiliated third parties for their own uses, such third parties may, with sufficient data from other sources, be able to personally identify you.

You can learn more about ad serving companies and the options available to limit their collection of use of your information by visiting the websites for the [Network Advertising Initiative](#) and the [Digital Advertising Alliance](#), the [privacy policy](#) for G5 the webpages for [Facebook's ad preferences tool](#) and [privacy policy](#) through your device settings and by resetting the advertiser ID on your Apple or Android device. For more information about how to change these settings go to:

Apple: <http://support.apple.com/kb/HT4228>

Android: <http://www.google.com/policies/technologies/ads/>

Windows: <http://choice.microsoft.com/en-US/opt-out>

Please note that opting-out of advertising networks services does not mean that you will not receive advertising while using our Sites or on other websites, nor will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. If you delete your Cookies, you may also delete your opt-out preferences.

We use third parties to provide analytics services about your use and interaction of our sites, including Google Analytics, a web analytics service provided by Google, Inc. Google Analytics and our other third party service providers and partners use Cookies or other tracking technologies to help us analyze how users interact with and use our Sites, compile reports on our Sites' activity, and provide other services related to our Sites' activity and usage. The technologies used by these third parties may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website. Our Sites do not use Google Analytics or other third-party services to gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's [privacy policies](#). To learn more about Google's partner services and to learn how to opt out of tracking of analytics by Google, click [here](#). The information generated by Adobe Analytics will be transmitted to and stored by Adobe and will be subject to Adobe's [privacy policies](#). To learn more about Adobe's partner services and to learn how to opt out of tracking of analytics by Adobe, click [here](#).

Your browser or device may include "Do Not Track" functionality. At this time, The Company does not respond to browser "Do Not Track" signals.

How We Share Information About You

We may share your information:

- With companies who work on our behalf to help us provide and support our Sites and our products and services. We require these service providers to treat all information we provide as confidential and to use it only for providing the services for which they

have been engaged.

- To provide you products and services, as well to send you information about other products and services we think you may be interested in.
- To create aggregated or de-identified data that does not identify you. Once the data is aggregated or de-identified, we may use it for any purpose permitted by law and we may share it with third parties for their own uses.
- With third parties so that they may communicate with you about our products and services, as well as to deliver marketing communications, including emails, newsletters, offers tailored to you, and other materials that they believe may be of interest to you.

We may change our ownership or corporate organization. We may transfer to another entity or its affiliates or service providers some or all of the information we hold about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Notice.

We may use or disclose information about you if required to do so by law or on the good-faith believe that such sharing is necessary to (a) conform to applicable law or comply with legal process served on us or our Sites; (b) protect and defend our rights or property, our Sites, or our users; or (c) act to protect the personal safety of our employees and agents, other users of our Sites, or members of the public.

Aggregation Websites Other companies offer websites and services that allow you to consolidate account information from multiple sources. To do this, those companies might ask you for your account credentials. The Company is not responsible for your use of such websites and services.

If you provide account credentials or other details about your account to such website or services, the Company will consider that you have authorized the website or service to access your account information. If you decide to revoke the authority you have given to an aggregation website or service, we strongly recommend that you change your password for the Sites to ensure that your account is inaccessible to the aggregation website or service.

How We Secure the Information We Collect From or About You

We use a combination of reasonable physical, technical, and administrative safeguards to protect the information we collect through our Sites and offline. When your personal information is shared, The Company's will take a reasonable approach to prevent the unauthorized use of Personal Information.

While we use these precautions to safeguard your Personal Information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

Retaining Your Information

In general, we do not keep Personal Information longer than is necessary for the purpose

or purposes for which the Information was originally collected and processed.

If required, we may retain your Personal Information where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Users Outside of the United States: If you use our Sites outside of the United States, you understand and consent to the transfer of information about you, and the collection, processing, and storage of information about you, in the United States and elsewhere. The laws in the U.S. and these countries regarding personal information may be different than the laws of your state or country.

California Notice

A. Your Rights to Request Access to and Deletion of your Personal Information

Under the California Consumer Privacy Act ("CCPA"), California consumers ("Consumers"), subject to certain exceptions, have the right to request access, correction and deletion of your Personal Information ("PI"), as these terms are defined in the CCPA, collected, used, transferred or processed by the Company.

Consumers can, subject to proper validation:

- Request confirmation as to whether the Company has PI relating to you;
- Review the accuracy of your PI and, where appropriate or legally required, request to have it corrected, completed or amended;
- Request access to your PI in a form permissible under applicable laws and regulations; and,
- Request deletion of your PI.

You can make such a request by calling Customer Service at (385) 775-5581 or emailing us at info@wqliving.com. If required by law, we will disclose and deliver the required information to you free of charge within 45 days of receiving a verifiable request (with an additional extension of 45 days if reasonably necessary). You may request this information free of charge up to two (2) times in a 12-month period.

B. Do Not Sell My Personal Information

Under the CCPA, Consumers also have the right to request that their information not be sold for value. This right may be referred to as the right to opt-out. Currently we do not knowingly sell or disclose information of Consumers to third parties for monetary or in-kind compensation. If we engage in such activities in the future, we will provide updated information via this Privacy Notice and provide instructions to submit a request that we do not sell your personal information.

In no case, however, will we sell personal information if we have actual knowledge that the information belongs to an individual under the age of 16 years without first obtaining appropriate parental consent.

C. Updating Your Information

If you have an account with us, you can update your information or adjust your contact

and marketing preferences by logging in to your online account. You may also contact your account representative or financial advisor to update information related to the accounts they manage.

D. Biometric Information

We may collect information from you about your physiological, biological or behavioral characteristics (e.g., voiceprints; video; scans of face geometry) to create biometric identifiers, which we may use to identify and authenticate you, including to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal, and to administer your account and maintain account-related records. We will obtain your consent before your information is used to create a biometric identifier. We may use third party service providers or disclose information as required by law or as otherwise specified in this Privacy Notice. However, we will not disclose your biometric identifiers to any third parties for their own use. We will protect your biometric information with the same security standards that we use to protect your highly sensitive Personal Information. We will retain your biometric information for as long as necessary for the purposes identified above. By using our Sites or locations, you have consented, or as required by law, to our use of that Personal Information.

Nevada Notice

Nevada law gives Nevada consumers the right to request that a company not sell their personal information. This right applies even if their personal information is not currently being sold. If you are a Nevada consumer and wish to exercise this right, please submit your request by calling Customer Service at (385) 775-5581 or emailing us at info@wqliving.com.

For Questions, or to Report a Problem

If you have other questions, comments or concerns about our privacy practices, or if you wish to issue a request to exercise your rights where applicable by law, please call Customer Service at (385) 775-5581 or email us at info@wqliving.com.

Effective date

This Notice was last updated and effective on January 1, 2020.