

PRIVACY POLICY

Version 3.0 – Updated December 20, 2019

Effective Date: December 20, 2019

At MBK Senior Living (“MBK”, also referred to as "us" or "we" in this Privacy Policy), your personal privacy is important to us. The following Privacy Policy describes the practices that we have adopted.

Please review this Privacy Policy, which governs the information collected through use by you (collectively sometimes referred to herein as "you" or "your") of the Website, or information collected in any other manner. Each time you access, use, or browse the Website, you signify your acceptance of the then-current Privacy Policy. If at any time you do not accept this Privacy Policy, then you are not authorized to access, browse or use the Website and you must discontinue use of the Website immediately.

Our Collection and Use of Your Personally Identifiable Information

As part of the normal operation of the Website, we may collect and, in some cases, use or disclose personally identifiable information (referred to herein as “personally identifiable information” or "PII") about you where we reasonably believe it will help us administer our business or provide products, services or other opportunities to you as described below.

For your convenience, we are listing the categories of PII that we collect below and have collected within the past 12 months:

Category	What We May Collect	How Collected
Identifiers.	A real name, alias, postal address, unique personal identifier, Internet Protocol address, online identifier, email address, account name, Social Security number, driver’s license number.	Through the Website, In-Person, Written in a completed form, application or other written correspondence, Web Chat and/or By Telephone.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, bank account number, credit card number, debit card number, or any other financial information, medical information.	Through the Website, In-Person, Written in a completed form, application or other written correspondence, Web Chat and/or By Telephone.

Protected classification characteristics under California or federal law.	Age (40 years or older), national origin, citizenship, marital status, veteran or military status.	Through the Website, In-Person, Written in a completed form, application or other written correspondence, and/or By Telephone.
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Through the Website, Written in a completed form, application or other written correspondence.
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Through the Website and marketing automation program.

Reasons for Collection

The reasons for collection of the above categories are to market a service or product to you or complete a transaction for you; marketing and promotional efforts, statistically analyze Website usage, improve Website content and product offerings and customize Website content, layout and services. In addition to the foregoing reasons for collection, we may, in our sole discretion, retain original and updated PII as part of our records for reasons such as technical constraints, dispute resolution, troubleshooting and agreement enforcement.

In addition to PII, we may also collect, aggregate, and share "Non-PII" which is information that is aggregated, anonymized, de-identified and is unable to be readily identified to you.

This Privacy Policy only addresses the use and disclosure of PII and other information we may collect from you. We do not have a process for you to request changes to your personally identifiable information that is collected in any manner.

MBK collects information from our users at several different points, including but not limited to the following:

Personally Identifiable Information You Provide To Us

Any personal information that we may collect about you is voluntarily provided to us by you. We receive and may store the information you provide to us. As you navigate through the Website, there are several online forms which you can use to request information about us. In order for us to respond to your request, we ask that you

provide to us, among other things, your first and last name, mailing address, telephone number, and email address on the online form. Other information may be identified as optional, and you may choose whether or not to provide it. The use of these online forms is completely voluntary. We may use your first and last name, email address, mailing address and telephone number to contact you from time to time. Visitors to the Website may navigate the entire Website without using any of these features or providing any information.

Correspondence

If you correspond with us, we may retain such information and PII included as part of the correspondence. In addition, where we have sent an email to you, we may receive confirmation that you have opened it. If you want to unsubscribe from an MBK email list, please let us know by following the “Unsubscribe” instructions that are included in each promotional email from us. Please note that such requests may take up to ten (10) days to become effective.

Cookies and Other Tracking Methods

Like many websites, we use cookies and similar technologies to collect additional website usage data. A cookie is a small piece of text sent to your browser by a website you visit. It helps the website to remember information about your visit, like your preferred language and other settings. That can make your next visit easier and the site more useful to you. Cookies do not contain personally identifiable information; however, once you choose to furnish a site with personally identifiable information, this information may be linked to the data stored in the cookie. When you access our Website, we look into the cookie to fill out some fields you would otherwise have to re-enter (but not passwords or any financial information) and customize our Website to be more relevant to you. There are products commercially available that are designed to help you disable cookies. You may delete and/or decline our cookies by selecting the appropriate settings on your browser, but some parts of our Website may not work properly if you do so and this may affect your ability to use the full functionality of the Website. Also, most browsers have incorporated certain “do not track” (DNT) features. Most of these features, when turned on, send a signal or preference to the website that a user visits, indicating that the user does not wish to be tracked. At this time, our Website does not respond to browser “do not track” (DNT) signals or other “opt out” settings or features that may be offered by your browser or similar devices, however, we reserve the right to do so in the future.

Google Analytics

Our Website uses Google Analytics, a web analytics service provided by Google. Google Analytics uses cookies and similar technologies to collect and store anonymous information about you, which may include the non-personal information described

above. You can read Google Analytics' privacy policy at <http://www.google.com/policies/privacy/partners/> and Google Analytics Terms of Use at <http://www.google.com/analytics/terms/us.html>. Our Website may use certain features of Google Analytics, including:

- (a) "Demographics and Interest Reporting" to analyze information regarding the interests and demographics of users of the Website. We use such non-personal information in the same manner as we use other non-personal information as described in this Privacy Policy.
- (b) "Remarketing with Google Analytics" to place ads on other sites directed to people who have visited the Website.
- (c) "Google Display Network Impression Reporting" to report how people's interactions with our ads relate to their visits to the Website.

You can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads by changing the ad settings at <https://support.google.com/ads/answer/2662856>. You also can opt-out from being tracked by Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser at <https://tools.google.com/dlpage/gaoptout/>.

Surveys & Contests

From time-to-time, our Website may request information from you via surveys or contests. Participation in these surveys or contests is completely voluntary and you may choose whether or not to disclose this information. PII and other information requested may include, but is not limited to, contact information (such as name, telephone number, email and mailing address), and demographic information (such as zip code, age level, interests).

Personally Identifiable Information and Information from Other Sources

We may receive PII and information about you from other sources, such as our agents, vendors and service providers and from publicly available sources. For example, sometimes we receive updated address information from third parties that we may use to update our records.

Disclosing Personally Identifiable Information To Third Parties

We do not sell your personally identifiable information. We may, however, share your PII with third parties (including any agents, vendors, service providers and any affiliate or subsidiary we may have), under the following circumstances:

- (1) The PII is provided to help promote or otherwise market a service or product to you or complete a transaction for you.

(2) The PII is provided to our agents, vendors or service providers who perform functions on our behalf. These agents, vendors or service providers only receive PII, if such information is needed to perform their function(s) or services, and they are not authorized to use any PII for any purpose(s) other than the purpose(s) set forth by us.

(3) The PII is provided to comply with applicable law, regulation or governmental request, enforce our Terms of Use or other agreements we have with you, or to protect our rights, property or safety, or the rights, property or safety of our users or others.

(4) The disclosure of PII is done as part of a purchase, sale or transfer of services or assets (for example, if substantially all of our assets are acquired by another party, your PII may be one of the transferred assets). We may also transfer such PII in the course of corporate divestitures, mergers, dissolution, joint ventures or reorganization.

We may store PII in locations outside our direct control (for instance, on servers or databases co-located with hosting providers).

For your convenience, you may consult the chart below to see what information we disclose and what categories of information we have disclosed in the prior 12 months.

Category	What We May Disclose
<i>Identifiers.</i>	A real name, alias, postal address, unique personal identifier, Internet Protocol address, online identifier, email address, account name, Social Security number, driver's license number.
<i>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</i>	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, bank account number, credit card number, debit card number, or any other financial information, medical information.
<i>Protected classification characteristics under California or federal law.</i>	Age (40 years or older), national origin, citizenship, marital status, veteran or military status.
<i>Commercial information.</i>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
<i>Internet or other similar network activity.</i>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

To Whom PII is Disclosed

With respect to the above categories, PII could be disclosed to our employees and third parties including any agents, vendors, service providers and any affiliate or subsidiary we may have.

Reasons for Disclosure

The reasons for disclosure of the above categories are to market a service or product to you or complete a transaction for you; or for agents, vendors or service providers who perform functions on our behalf. In addition to the reasons for disclosure described above, we may, in our sole discretion, disclose original and updated PII to comply with applicable law, regulation or governmental request, to enforce our Terms of Use or other agreements we have with you, or to protect our rights, property or safety, or the rights, property or safety of our users or others.

We may also gather aggregated data about you and disclose the results of such aggregated information (but not PII) to third parties for marketing, promotional or other purposes.

Sale of Personally Identifiable Information

In the preceding twelve (12) months, we have not sold personally identifiable information.

Inapplicability of Privacy Policies of Any Linked Websites or Other Third Parties

Our Website contains links to or integrations with other sites, whose information practices may be different than ours. Visitors should consult the other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties.

This Privacy Policy only addresses MBK's use and disclosure of your personally identifiable information. We are not responsible for the privacy practices of any third parties or the content of linked websites, although we encourage you to read any applicable privacy policies of such parties or websites.

Protection of Personally Identifiable Information

We have put in place appropriate physical, electronic and managerial procedures to safeguard against foreseeable risks, such as unauthorized access. Please be aware that the Website and data storage are run on software, hardware and networks, any component of which may, from time to time, require maintenance or experience problems or breaches of security beyond our control. We are not responsible for the acts and omissions of any third parties.

No transmission of data over the internet is guaranteed to be completely secure. We cannot guarantee the security of the information on and sent from the Website. It may

be possible for third parties not under our control to intercept or access transmissions or private communications unlawfully. While we strive to protect your personally identifiable information, we cannot ensure or warrant the security of any information you transmit to us over the internet. Any such transmission is done at your own risk.

Compromise of Personally Identifiable Information

In the event that PII is compromised as a result of a breach of security, we will promptly notify those persons whose PII has been compromised, in accordance with the notification procedures set forth in this Privacy Policy, or as otherwise required by applicable law.

Information from Children

Because of the nature of our business, our products and services are directed to persons 18 years of age or older and are not designed to appeal to minors. If you provide information to us through the Website, you represent and warrant to us that you are 18 years of age or older. We do not knowingly attempt to solicit or receive any information from children. Specifically, the Website is not intended or designed to attract children under the age of 13. If you are 13 -17 years of age, you may visit, browse and use the information on the Website, but you may not submit any personal information to the Website, and you represent and warrant that you have permission of your parent or guardian to use the Website, who agrees to this Privacy Policy and the Terms of Use on your behalf. If you are a parent and believe that we may have inadvertently collected personal information from your child, please notify us immediately by sending an email, including the Website to which your request pertains, to Privacy@mbk.com.

Conditions of Use, Notices and Changes to Our Privacy Policy

By using the Website you agree to the terms and conditions in this Privacy Policy and the MBK Terms of Use (the terms and conditions of which are hereby incorporated by reference). In the event of any conflict between the terms and conditions of this Privacy Policy and the Terms of Use, then the Terms of Use shall control. If you do not agree to any of these terms and conditions you should not access, browse or use the Website.

You agree that any dispute over privacy or the terms contained in this Privacy Policy, our Terms of Use, or any other agreement we have with you will be governed by the law of the State of California.

As our business changes from time to time, this Privacy Policy and the Terms of Use are subject to change at any time. We reserve the right to amend the Privacy Policy and Terms of Use at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy and/or Terms of Use to the Website and changing the version number and date of the Terms of Use and Privacy Policy which is noted just below the first line of text that is the title of these documents. The use of your

information is subject to the Privacy Policy and Terms of Use in effect at the most recent time of use. The policies and procedures described herein replace all previous policies and procedures regarding this subject. We encourage you to periodically check back and review the policies and procedures so that you always will know what PII and other information we collect, how we use it, and with whom we share it.

Governing Law

This Privacy Policy shall be governed by, and will be construed under, the laws of the State of California, U.S.A., without regard to choice of law principles. Those who choose to access the Website from locations outside of the United States do so on their own initiative, and are responsible for compliance with local laws if and to the extent local laws are applicable, including without limitation, all applicable laws, rules and regulations regarding the transmission of data exported from the United States or the country in which you reside.

CALIFORNIA RESIDENTS: Your California Privacy Rights

Personal Information Shared for Direct Marketing Purposes

If you are a California resident and have provided personal information to us, you are entitled by California's "Shine the Light" law (Civil Code Section 1798.83) to request certain information about the personal information we shared, if any, with other businesses for their own direct marketing uses. To make such a request, send an email to Privacy@mbk.com with "Request for California Privacy Information" on the subject line and in the body of your message. Include the website or line of business to which your request pertains. We will provide the requested information to you at your e-mail address in response. Please allow thirty (30) days for a response. We are required to respond to only one request per customer each year, and we are not required to respond to requests made by means other than through the above email address.

We will not share your personal information with third parties for their direct marketing purposes if you request that we do not do so. You may make such a request by sending us an email at Privacy@mbk.com or mailing your request to 4 Park Plaza, Suite 1700, Irvine, CA, 92614. When contacting us, please indicate your name, address, email address, which website or line of business to which your request pertains, and what personal information you do not want us to share with third parties for their direct marketing purposes. Please note that there is no charge for controlling the sharing of your personal information or for processing this request.

California Do Not Track Disclosures

California Business & Professions Code Section 22575(b) (as amended effective January 1, 2014) provides that California residents are entitled to know how a website

operator responds to “Do Not Track” (DNT) browser settings. DNT is a feature offered by some browsers which, when enabled, sends a signal to websites to request that your browsing is not tracked, such as by third party ad networks, social networks and analytic companies. We do not currently take actions to respond to DNT signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a DNT standard once one is created. For information about DNT, please visit: www.allaboutdnt.org.

California Residents: Your Request Rights

This privacy notice for California residents supplements the information contained in the previous portions of this Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), as may be amended or supplemented, and any terms defined in the CCPA have the same meaning when used in this notice.

If you are a California resident, you should be aware that you have certain special rights regarding your PII and any “personal information” as that term is described in the California Consumer Privacy Act. Such information is collectively referred to in this Privacy Policy as “personal information”.

1) If you are a California resident, you may request that we disclose the following:

- (a) The categories of personal information we have collected about you.
- (b) The categories of sources from which the personal information is collected.
- (c) The business or commercial purpose for collecting or selling personal information.
- (d) The categories of third parties with whom we share personal information.
- (e) The specific pieces of personal information we have collected about you.

2) If you are a California resident, we are obligated to make additional disclosures if we choose to sell or share your data for business purposes. While we do not sell your personal information, we may disclose your personal information to third parties in the ordinary course of business. Following this, we will disclose the following at your request:

- (a) The categories of personal information that the business collected about you.
- (b) The categories of personal information that the business sold about you and the categories of third parties to whom the personal information was sold, by

category or categories of personal information for each third party to whom the personal information was sold.

(c) The categories of personal information that we have disclosed about you for a business purpose.

You may request the above information at least twice per 12 month period. We will ask for some verification to comply with this request in order to protect your privacy.

3) If you are a California resident, you may also make a request to delete the information we have collected about you.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - (1) Sales, identifying the personal information categories that each category of recipient purchased; and
 - (2) Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Right to Opt-Out

You have the right to direct us to not sell your personal information at any time (the "right to opt-out"). To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

[Do Not Sell My Personal Information](#)

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by e-mailing us at Privacy@mbk.com.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by filling out the form [HERE](#) or by contacting us at Privacy@mbk.com or calling us toll free at (855) 914-1947 describing your request(s). The verification we may request will reflect personal information that you have previously provided to us.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. These requests are free, though we reserve the right to implement a reasonable fee for excessive or complex requests you may submit. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Personal Information Sales Opt-Out and Opt-In Rights

If you are 16 years of age or older, you have the right to opt-out and direct us to not sell your personal information at any time. We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

[Do Not Sell My Personal Information](#)

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by e-mailing us at Privacy@mbk.com.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Questions Regarding This Privacy Policy

If you have any questions about our Privacy Policy, or would like to remove your stored information, please contact us at Privacy@mbk.com or you can write to us at 4 Park Plaza, Suite 1700, Irvine CA, 92614.