

Compass Senior Living Privacy Policy

This Privacy Policy was last updated: March 21, 2023

Thank you for visiting Compass Senior Living's Internet website ("Site") located at the URL www.compass-living.com. This Privacy Policy details certain policies implemented throughout governing the collection and use of personally identifiable information about users of the Site and our services.

Privacy Policy Updates

Due to the Internet's rapidly evolving nature, Compass Senior Living may need to update this Privacy Policy from time to time. If so, Compass Senior Living will post its updated Privacy Policy on our Site along with a change notice on the Site. Compass Senior Living may also send registered users of our services a notice that this Privacy Policy has been changed. Compass Senior Living encourages you to review this Privacy Policy regularly for any changes. Your continued use of this 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.

Information Collection

In certain sections of this Site, we may require you to submit your personally identifiable information to us, and we may invite you to submit questions, comments, and request information. In addition to any personal information that you may voluntarily provide, the Site collects information using cookies and other third-party tools. Please refer to the sections below on "Cookies," "Third Party Analytics Tools," and "Third Party Advertising Tools" for more information about the information these tools collect and use.

We also may collect personally identifiable information about you if you are an individual potential resident or customer of one of our clients and you complete a reservation form or indicate an interest to become a resident in a property or to become a customer of a senior living facility ("Customer Data"). We also may collect any personally identifiable information and other information if you subscribe to our Reputation or Social Manager services that you elect to publicly post on social media websites ("Social Media Communications").

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,

company name, website name, address, phone number, and other contact information that you voluntarily transmit in your communication to us or that you include in your Social Media Communications. If you are a potential resident or customer of a senior living facility, we may also collect your credit card number and information. If you are a client of our services, we will collect billing information and the features and amenities of your property. If you are a client of our Reputation or Social Manager services, we may collect your contact information and login credentials (such as username, password, and PIN) for third-party websites so our services can integrate with Facebook, Twitter, GoDaddy, Google Places, etc. If you post to our blogs, we may collect any other personally identifiable information that you include in your posting.

Information Use

We may use your personally identifiable information to deliver our services, reports, or information you have requested, verify your authority to enter certain password-protected areas of the Site, verify that you are a customer or prospective customer, send you information that you have signed up to receive, notices about our products and/or services that you have used or that may be of interest to you and notices about events and improve the content and general administration of the Site and our services. If you are a potential resident or customer of a senior living facility, we may use your Customer Data, including your credit card information, to reserve an apartment unit for you pursuant to your request.

Children's Privacy

Compass Senior Living recognizes the privacy interests of children, and we encourage parents and guardians to take an active role in their children's online activities and interests. Neither the Site nor our services are intended for children under the age of 16. Compass Senior Living does not target its services or this Site to children under 16. Compass Senior Living does not knowingly collect personally identifiable information from children under the age of 16.

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. You can remove persistent cookies by following the directions provided in your Internet browser's "help" file.

On the Site, we use session cookies to make it easier for you to navigate the Site by saving your preferences and improving and tracking the overall Site experience. For the Site, we set a persistent cookie to authenticate your login and authorization to use the services. If you reject cookies, you may still use the Site, but your ability to use some areas of the Site may be limited.

Third-Party Analytics Tools

Beyond the personally identifiable information you voluntarily provide to us, Compass Senior Living utilizes analytics tools including third party technologies, such as Google Analytics, to collect information using cookies. Certain types of information, including geolocation, device type, onsite website usage and behavior, demographic data, and purchase history, are collected and aggregated across Compass Senior Living Site users for our analysis and advertising efforts.

Third-Party Advertising Tools

Compass Senior Living uses Google Analytics and Google Ads and similar types of technologies to display relevant advertisements to users who have previously visited the Site. Referred to as remarketing or retargeting, Compass Senior Living may utilize previous session information to serve display advertisements to you on the Site, and based on such session information Google may set a cookie and serve ads to you on third-party websites on the Google Display Network. Third-party vendors such as Google may display Compass Senior Living ads on websites across the Internet. Aggregated user data may be utilized to create remarketing/retargeting “lists,” or groups of users with similar onsite behaviors or demographics. Compass Senior Living also uses Google tools to display advertisements to users based on their inferred interests and demographics.

Users may learn more about Google’s use of cookies by visiting the Google Privacy and Terms page at <http://www.google.com/policies/>. You may opt-out of being tracked by Google Analytics by i) Turning off cookies in the preferences settings in your browser ii) Downloading the Google Analytics opt-out browser add-on available at: <https://tools.google.com/dlpage/gaoptout/> iii) Opting out of user interest and demographic categories in the Settings for Google Ads feature to manage or opt-out of Google interest-based ads or iv) Managing cookies used for online advertising across multiple companies at the US-based Network Advertising Initiative at <http://www.networkadvertising.org/choices/>.

Usage Information

We automatically collect information about your interactions with the Site, including information about the device you use to interact with and/or access the Site, such as IP address, access dates and times, information about your approximate location (as determined through your IP address), hardware and software information, mobile, computer or hardware device information (e.g., operating system version, Hardware model, IMEI number and other unique device identifiers, MAC address, and device settings), device event information, and crash data. This information allows Compass Senior Living to understand how you have used the Site (which may include administrative and support communications with us or whether you have clicked on links to External Websites), and other 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.

Aggregate Information

The Site may track the total number of visitors to the Site, the number of visitors to each page of the Site, browser type, IP addresses, External Websites (defined below) linked to, and other aggregated data collected through our services and we may analyze this data for trends and statistics in the aggregate but such information will be maintained, used and disclosed in aggregate form only and it will not contain personally identifiable information. We may use such aggregate information to analyze trends, administer the Site, track users' movement, and gather broad demographic information for aggregate use.

Disclosure of Personally Identifiable Information

We may provide your personally identifiable information and the data generated by cookies and the aggregate information to the vendors and service agencies that we may engage to assist us in providing our services to you. If you are a user of our services, we may provide your personally identifiable information to third parties at your request to provide additional functionality in and/or integrations with our services. Such third-party entities may be obligated to use your personally identifiable information solely to provide the services to us.

If you post to our blogs, other users of the Site will be able to see your posting and any other personally identifiable information you include in your posting. If you are a user of our services, we will publicly display the features and amenities of your properties on the websites that we create for you. If you are a potential resident of a property or customer of a storage facility, we may provide your Customer Data to the

applicable property and/or storage facility owner or operator for the property in which you indicated an interest.

We will disclose your personally identifiable information if we believe we are required to do so by law, regulation, or other government 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 entity upon a merger, consolidation, or other corporate reorganization in which Compass Senior Living participates or to a purchaser of all or all of Compass Senior Living's assets to which this Site relates.

Links to Third-Party Sites

The Site may provide links to other Websites or resources over which Compass Senior Living does not have control ("External Websites"). Such links do not constitute an endorsement by Compass Senior Living of those External Websites. You acknowledge that Compass Senior Living is providing these links to you only as a convenience, and further agree that Compass Senior Living is not responsible for the content of such External Websites. Your use of External Websites is subject to the terms of use and privacy policies located on the link to External Websites.

Security

We employ industry-standard procedural and technological measures that are designed to help protect your personally identifiable information from loss, and unauthorized access, disclosure, alteration, or destruction. For example, Compass Senior Living may use, without limitation, firewalls, password protection, secure socket layer, and other security measures to help prevent unauthorized access to your personally identifiable information.

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.

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 "Questions" section of this Privacy Policy below.

Personal Information We Collect

For purposes of this section “personal information” means information that identifies, relates to, describes, is capable of being associated with, or could 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 information; and
- information excluded from the scope 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 financial information covered under the Fair Credit Reporting Act (“FCRA”) or Gramm-Leach Bliley Act (“GLBA”).

In the last twelve (12) months, we have collected the categories of personal information described in the table below:

	<u>Category</u>	<u>Examples</u>	<u>Collected</u>
1.	Identifiers	Real name (such as first name and last name); alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	Yes
2.	Customer Records Information (personal information categories listed in the customer records statute in California Civil Code Section 1798.80(e))	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, 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.	Yes

3.	Characteristics of protected classifications under California or federal law	Age (forty (40) years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital or familial 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 affiliations or activities, status as a victim of domestic violence, assault, or stalking.	No
4.	Commercial information	Records of products or services purchased, personal property, or other purchasing or consuming histories or tendencies.	Yes
5.	Biometric information	Fingerprints, facial or hand imagery, voice recordings from which an identifier template can be extracted, keystroke patterns, gait patterns, sleep, health, or exercise data.	Yes
6.	Internet or other similar network activity information	Browsing history, search history, information regarding consumer's interaction with a website, application, or advertisement.	Yes
7.	Geolocation data	GPS coordinates or other location-tracking information.	Yes
8.	Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
9.	Professional or employment-related information	Employer, employment history, resumes and CVs, background checks, and other employment-related information.	Yes
10.	Education information	Records maintained by an educational agency or institution that pertain to a student, such as grades and transcripts (as defined under 20 U.S.C. § 1232(g) and 34 C.F.R. Part 99).	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	Yes

The table below describes the sources for each category of personal information we collect, the business and/or commercial purposes for which we use each category of personal information and the third parties with whom we share each category of personal information we collect.

	<u>Category of Personal Information Collected</u>	<u>Sources from Which Personal Information is Collected</u>	<u>Business or Commercial Purposes</u>	<u>Third Parties Shared With</u>
1.	Identifiers	<ul style="list-style-type: none"> • Consumer Service Products • Prospective Client • Client • Business Partners • Prospective Business Partners 	<ul style="list-style-type: none"> • Order processing • Providing services to clients • Supporting client services to consumers • Advertising • Marketing • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior Living as a service provider. • Compass Senior Living's service providers • Compass Senior Living's clients' service providers
2.	Customer Records Information (personal information categories listed in the customer records statute in California Civil Code Section 1798.80(e))	<ul style="list-style-type: none"> • Consumer Service Products • Prospective Client • Client • Business Partners • Prospective Business Partners 	<ul style="list-style-type: none"> • Order processing • Providing services to clients • Supporting client services to consumers • Advertising • Marketing • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior Living as a service provider. • Compass Senior Living's service providers • Compass Senior Living's clients' service providers

3.	Commercial information	<ul style="list-style-type: none"> • Consumer Service Products • Prospective Client • Client • Business Partners • Prospective Business Partners 	<ul style="list-style-type: none"> • Order processing • Providing services to clients • Supporting client services to consumers • Advertising • Marketing • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior Living as a service provider. • Compass Senior Living's service providers • Compass Senior Living's clients' service providers
4.	Biometric information	<ul style="list-style-type: none"> • Consumer Service Products • Prospective Client • Client • Business Partners • Prospective Business Partners 	<ul style="list-style-type: none"> • Order processing • Providing services to clients • Supporting client services to consumers • Advertising • Marketing • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior Living as a service provider. • Compass Senior Living's service providers • Compass Senior Living's clients' service providers
5.	Internet or other similar network activity information	<ul style="list-style-type: none"> • Consumer Service Products • Prospective Client • Client • Business Partners • Prospective Business Partners 	<ul style="list-style-type: none"> • Order processing • Providing services to clients • Supporting client services to consumers • Advertising • Marketing 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior Living as a service provider.

			<ul style="list-style-type: none"> • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • Compass Senior Living's service providers • Compass Senior Living's clients' service providers
6.	Geolocation data	<ul style="list-style-type: none"> • Consumer Service Products • Prospective Client • Client • Business Partners • Prospective Business Partners 	<ul style="list-style-type: none"> • Order processing • Providing services to clients • Supporting client services to consumers • Advertising • Marketing • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior Living as a service provider. • Compass Senior Living's service providers • Compass Senior Living's clients' service providers
7.	Sensory data	<ul style="list-style-type: none"> • Consumer Service Products • Prospective Client • Client • Business Partners • Prospective Business Partners 	<ul style="list-style-type: none"> • Order processing • Providing services to clients • Supporting client services to consumers • Advertising • Marketing • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior Living as a service provider. • Compass Senior Living's service providers • Compass Senior Living's clients' service providers

8.	Professional or employment-related information	<ul style="list-style-type: none"> • Consumer Service Products • Prospective Client • Client • Business Partners • Prospective Business Partners 	<ul style="list-style-type: none"> • Order processing • Providing services to clients • Supporting client services to consumers • Advertising • Marketing • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior Living as a service provider. • Compass Senior Living's service providers • Compass Senior Living's clients' service providers
9.	Education information	<ul style="list-style-type: none"> • Consumer Service Products • Prospective Client • Client • Business Partners • Prospective Business Partners 	<ul style="list-style-type: none"> • Order processing • Supporting client services to consumers • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior Living as a service provider. • Compass Senior Living's service providers • Compass Senior Living's clients' service providers
10.	Inferences	<ul style="list-style-type: none"> • Consumer Service Products 	<ul style="list-style-type: none"> • Order processing • Supporting client services to consumers • Compass Senior Living's internal operations 	<ul style="list-style-type: none"> • The specific business from which the individual is seeking information or services pursuant to a written agreement between such business and Compass Senior

				Living as a service provider. <ul style="list-style-type: none"> • Compass Senior Living's service providers • Compass Senior Living's clients' service providers
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Personal Information We Disclose

- ***Sale of Personal Information***
 - Compass Senior Living does not sell personal information.
- ***Disclosure of Personal Information for Business Purposes***
 - Compass Senior Living discloses the following categories of personal information for business purposes:
 - Identifiers; Customer records information; Commercial information; Biometric information; Internet or other similar network activity information; Geolocation data; and Sensory Information.

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 Compass Senior Living disclose to you what personal information we collect, use, disclose, and sell. You may exercise this right following the methods described under the subsection titled "Exercising Your Rights" below.

- ***Right to Delete Personal Information***

- You have the right to request that Compass Senior Living delete personal information we may hold about you. You may exercise this right following the methods described under the subsection titled “Exercising Your Rights” below.
- Please be aware that we may not always be able to delete your 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. Because we do not sell personal information, this right does not apply to Compass Senior Living.

- ***Right to Non-Discrimination***

- You have the right to not receive discriminatory treatment from Compass Senior Living for exercising any of your rights described under this “Your Rights” section. This means we will not treat you differently for exercising any 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 follow the methods described below:

- By email: You may submit requests to cslsayhello@compass-living.com

To verify your request, we will work on a case-by-case basis to confirm that you are authorized to make any such data privacy request.

You may designate an authorized agent to submit a request on your behalf. To designate an authorized agent, you must have the agent include with the request on your behalf a document signed by you that authorizes the agent to act on your behalf aligned with a valid form of government ID.

We will respond to your rights request within forty-five (45) days from the date we receive it. In some cases, we may require additional time to complete your request and will inform you if additional time is needed. Where additional time is needed, we may take up to a maximum of ninety (90) additional days to complete your request.

Financial Incentives

Compass Senior Living does not offer financial incentives or price or service differences in exchange for the retention or sale of personal information.

Notice to Users Outside of the United States

This Site and the services are targeted at users in the United States of America. The personal information that we collect is sent to and processed on servers located in the United States. Such transfer is necessary to process the information and provide the Site and services. The data protection laws of the United States or other countries may not be as comprehensive or equivalent to those in your country of residence.

Questions

If you have any questions regarding this Privacy Policy, please contact us via email at cslsayhello@compass-living.com.