

Anthology Senior Living Privacy Notice

Last Updated/Effective Date: March, 2023

Anthology Senior Living and its affiliates (“**Anthology**,” “**we**,” “**us**,” or “**our**”) respect your privacy. This Privacy Notice describes the processing of Personal Information (defined below) that is provided, collected, or shared on the sites, applications, social media pages, or other platforms from which it is linked (collectively, the “**Site**”). It also describes your choices about the collection, disclosure, and use of your Personal Information. This Privacy Notice does not apply to Personal Health Information (“**PHI**”) as that term is defined under HIPAA.

1. Personal Information We Collect

We may collect a range of Personal Information. “Personal Information” means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you.

The types of Personal Information we collect may include:

- **Contact Information** – If you submit an inquiry or provide information on our Site, we may collect your contact information. This may include your name, email address, demographic information, and phone number.
- **Location Data** – While navigating our Site your mobile device or browser may share your location data, both through WiFi and GPS. We will collect this information based on the settings of your phone and browser.
- **Usage Information** – When you use our Site, our servers may automatically record information, including your Internet Protocol address (IP Address), browser type, referring URLs (e.g., the site you visited before coming to our Site), domain names associated with your internet service provider, information on your interaction with the Site, and other such information.
- **Employment Information** – If you apply for employment, we will collect your employment and work history, as well as other Personal Information related to your potential employment. This may include your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.
- **Communication Information** – We may collect audio, electronic, or visual information; any data in any files uploaded, emailed or otherwise provided by you; the contents of your communications with us, whether via e-mail, social media, telephone or otherwise, and inferences we may make from other Personal Information we collect.

2. How We Collect Your Personal Information

- **We May Collect Your Personal Information Directly From You** – For example, if you request services or information from us.
- **We May Also Collect Personal Information From Third Parties** – For example, we may work with business partners, subcontractors, advertising networks, analytics providers, and search information providers, who may provide us with Personal Information about you.

- **Through Online Tracking Technologies** – We and our service providers may use cookies, device identifiers, and similar technologies such as pixels, web beacons, and local storage to collect usage and browser information about how you use the Site. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of the Site, to enhance your experience through personalization, and to help us better understand the features of the Site that you and other users are most interested in.

Our Site may enable cookies and other tracking technologies to be placed on your device by third parties. Some of our service providers or plug-ins may use cookies or other methods to gather information regarding your use of the Site and may combine the information in these cookies with any Personal Information about you that they may have. The use of such tracking information by a third party depends on the privacy notice of that third party. We do not respond to Do Not Track (“DNT”) signals sent to us by your browser at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/>.

Online Behavioral Advertising. We or our service providers may use cookies and similar technologies to serve advertisements on our behalf that are customized based on predictions about your interests generated from your visits to websites (including this Site) over time and across different websites. The data collected may be associated with your Personal Information. These advertisements may appear on the Site and on other websites, and may be sent to you via email.

We use Google Ads to serve ads across various websites. Google uses Cookies to collect data about your visits to the Site to generate targeted advertisements to you on other websites that you visit. To opt-out of this type of advertising by Google, to customize your ad preferences, or to limit Google’s collection or use of such data, visit [Google’s Safety Center](#) and [Google’s Ad Settings](#) and follow [Google’s personalized ad opt-out instructions](#). Opting out will not affect your use of the Site.

To change your preferences with respect to certain online ads or to obtain more information about ad networks and online behavioral advertising, visit [National Advertising Initiative Consumer opt-out page](#) or the [Digital Advertising Alliance Self-Regulatory Program](#). Changing your settings with individual browsers or ad networks will not necessarily carry over to other browsers or ad networks. As a result, depending on the opt-outs you request, you may still see our ads. Opting-out of targeted advertising does not opt you out of all ads, just those targeted to you.

- **Through Analytics** – We use analytics services, including Google Analytics, to assist us with analyzing our website traffic through cookies and similar technologies. To learn more about how Google uses data, visit [Google’s Privacy Policy](#) and Google’s page on “[How Google uses data when you use our partners’ sites or apps](#).” You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

Most browsers provide you with the ability to block, delete, or disable cookies and similar technologies, and your mobile device may allow you to disable transmission of unique identifiers and location data. If you choose to reject cookies and similar technologies, or block device identifiers, some features of the Site may not be available, or some functionality may be limited or unavailable. Please review the help settings of your browser or mobile device for assistance with changing your settings.

3. How We Use Personal Information

To the extent permitted by applicable law, we may use Personal Information to:

- operate the Site and provide support to our business functions;
- fulfill customer requests, such as responding to an inquiry;
- protect against criminal activity, claims and other liabilities;
- send you information about our company, services, and promotions;
- respond to reviews, comments, or other feedback provided to us;
- support and personalize the Site and our advertising efforts;
- protect the security and integrity of the Site;
- provide customer support;
- the extent required for benchmarking, data analysis, audits, enhancing the Site, software and applications development, improving the Site or our services, conducting research, analysis, studies or surveys, identifying usage trends, as well as for other analytics purposes;
- meet our contractual requirements;
- comply with applicable legal or regulatory requirements and our policies;
- respond to inquiries related to employment opportunities;
- market, advertise, and provide the Site and our services; and
- the extent necessary for any other lawful purpose for which the Personal Information is collected.

4. Disclosure of Personal Information

We may disclose your Personal Information in the following circumstances:

- **For Legal Obligation or Safety Reasons** – When we have a good faith belief that access, use, preservation or disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of the Terms of Use, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Anthology, its users, or the public against harm.
- **In the Case of a Merger or Sale** – If and when we are involved in a merger, acquisition, or any form of transfer or sale of some or all of its business, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Personal Information may be transferred along with the business. Where legally required we will give you prior notice and if you have a legal right to do so, an opportunity to object to this transfer.
- **To Service providers** – When we hire a service provider to help operate the Site or our business, we may give access to Personal Information as necessary to perform the service for Anthology. This may include service providers that operate our Site, send our communications, or run our promotions.
- **To Business Partners** – We may share Personal Information with our trusted business partners. For example, we may disclose your Personal Information to a third party if we co-sponsor a promotion or service. These partners and affiliates may use your Personal Information to, among other things, send you information or contact you about their services and products.

5. How Long Do We Keep Your Personal Information

We will retain your Personal Information for as long as necessary to fulfill the purposes for which it has been collected, as outlined in this Privacy Notice, or any longer retention period required by law.

6. How We Protect Your Personal Information

We use our commercially reasonable efforts to protect the confidentiality and security of Personal Information we process. However, despite these efforts to store Personal Information in a secure operating environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of Personal Information, we cannot guarantee that our security measures will prevent third parties such as hackers from illegally obtaining access to Personal Information.

7. Your Choices and Controls

Depending on where you live, you may have the following rights with respect to your Personal Information:

- Access
- Data Portability
- Erasure
- Correction
- Opt Out of Sales of Personal Information

For a description of these rights, please see the applicable chart in Section 11(B) of this Privacy Notice. In addition, you may have the right to opt out of targeted advertising and profiling, to the extent that profiling makes decisions that produce legal or similarly significant effects concerning you. To exercise any of these rights available to you, see Section 12 below.

To opt-out of marketing communications please email us at AnthologyPrivacy@ca-anthology.com or by following the instructions included in the email or text correspondence. Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law. Additionally, if you withdraw your consent or object to processing, or if you choose not to provide certain Personal Information, we may be unable to provide some or all of our services to you.

Where we collect sensitive Personal Information from you, we will only do so where we have obtained your prior express consent, if required by law.

8. International Use of the Site

This Site is hosted in the United States. If you are visiting this Site from outside of the United States, please note that your Personal Information will be, stored, collected, or processed, in the United States, where our data center and servers are located and operated.

9. Children's Privacy

We do not knowingly collect or solicit any Personal Information from children under the age of 16. In the event that we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you are a parent or legal guardian and think your child has given us their Personal Information, you can email us at AnthologyPrivacy@ca-anthology.com or contact us using the information listed in Section 14.

10. Links to Third-Party Websites

We are not responsible for the practices employed by any websites or services linked to or from the Site, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be subject to the applicable third party’s Privacy Notice.

11. California Residents

Subject to certain exceptions, this Section applies to our collection and use of “Personal Information” if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (“CPRA”). This Section describes (1) the categories of Personal Information, collected and disclosed by us, subject to CPRA, (2) your privacy rights under CPRA, and (3) how to exercise your rights.

When we use the term “Personal Information” in the context of CPRA, we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household.

If you would like to receive a copy of this Section in an alternate format (e.g., printable) or language, please contact us using the information provided in Section 14.

A. Categories of Personal Information Collected, Used, and Disclosed

We have collected the categories of Personal Information indicated in the chart below within the last 12 months. The sources from which we obtain this information are set forth in Section 2 above. We also disclose this Personal Information for the purposes set forth in Section 4 above. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Category	Purpose of Collection	Categories of Third Parties to Which We Disclose Personal Information for Business or Commercial Purpose	Categories of Third Parties to Which We May Sell or Share Personal Information
Identifiers.	See section above titled “How We Use the Personal Information Collected”	Service providers.	We do not sell or share this category of Personal Information.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	See section above titled “How We Use the Personal Information Collected”	Service providers.	We do not sell or share this category of Personal Information.

Protected classification characteristics under California or federal law.	See section above titled “How We Use the Personal Information Collected”	Service providers.	We do not sell or share this category of Personal Information.
Commercial information.	See section above titled “How We Use the Personal Information Collected”	Service providers.	We do not sell or share this category of Personal Information.
Internet or other similar network activity.	See section above titled “How We Use the Personal Information Collected”	Service providers.	We do not sell this category of Personal Information, however we may share it for purposes of cross contextual behavioral advertising.
Professional or employment-related information.	See section above titled “How We Use the Personal Information Collected”	Service providers.	We do not sell or share this category of Personal Information.
Inferences drawn from other personal information.	To conduct analytics, business and product development	Service providers.	We do not sell or share this category of Personal Information.
Sensitive personal information	See section above titled “How We Use the Personal Information Collected”	Service providers.	We do not sell or share this category of Personal Information.

We also do not knowingly sell or share personal information of consumers under the age of 16.

We will retain each category of your Personal Information for as long as necessary to fulfill the purposes described in the “How We May Use your Information” section above, unless otherwise required by applicable laws. Criteria we will use to determine how long we will retain your Personal Information include whether: we need your Personal Information to provide you with products or services you have requested; we continue to have a relationship with you; you have requested information, products, or services from us; we have a legal right or obligation to continue to retain your Personal Information; we have an obligation to a third party that involves your Personal Information; our retention or recordkeeping policies and obligations dictate that we retain your Personal Information; we have an interest in providing you with information about our products or services; and we have another business purpose for retaining your Personal Information.

B. Your California Privacy Rights

Subject to certain exceptions, if you are a resident of California, you may have the following rights:

Privacy Right	Description
Notice	The right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and disclosed.
Access	The right to request the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such Personal Information is collected and disclosed. You may also have the right to request the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information.
Data Portability	The right to receive the Personal Information you have previously provided to us.
Deletion	The right to have your Personal Information deleted. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required or permitted to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); or (4) to otherwise use your Personal Information internally, in a lawful manner that is compatible with the context in which you provided it.
Correction	The right to request that we correct any incorrect Personal Information that we collect or retain about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see below), we will correct (and direct any of our service providers that hold your data on our behalf to correct) your Personal Information from our records, unless an exception applies. We may deny your correction request if (a) we believe the Personal Information we maintain about you is accurate; (b) correcting the information would be impossible or involve disproportionate; or (c) if the request conflicts with our legal obligations.
Automated Decision Making	The right to request information about the logic involved in automated decision-making and a description of the likely outcome of processes, and the right to opt out. We do not currently engage in any automated decision-making practices.
To Opt Out of Sales or Sharing of Personal Information	The right to opt-out of the sale and sharing of your Personal Information. When you opt-out of sales, we will not share your Personal Information with our advertising vendors or marketing partners. However, for Personal Information already shared, you will need to submit your access, deletion, and opt-out requests to each partner individually. When you opt out of sharing, we will not share your Personal Information with third parties for purposes of cross-context behavioral advertising.

Limit Use of Sensitive Personal Information	We do not use or disclose sensitive Personal Information other than to provide our services to you. However, if we used or disclosed sensitive Personal Information for other purposes, you would have the right to opt out.
---	--

12. Exercising Your Individual Privacy Rights

To exercise any of the privacy rights afforded to you under applicable data protection law, please submit a request to us by one of the following methods:

- Calling us toll free at +1 877 268 7860
- E-mailing us AnthologyPrivacy@ca-anthology.com
- Submitting a request through our web form

Verification: We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. We will only use Personal Information provided in a request to verify the requestor’s identity. If you are an authorized agent making a request on behalf of an individual, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney.

We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.

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

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes.

Appeals: If you are not satisfied with the resolution of your request and would like to submit an appeal, please follow the instructions provided to you in our response to your request.

We will not discriminate against you for exercising any rights under applicable privacy law.

13. Changes to this Privacy Notice

Please note that we may modify or update this Privacy Notice from time to time, so please review it periodically. We may provide you with an updated Privacy Notice if material changes are made. Unless otherwise indicated, any changes to this Privacy Notice will apply immediately upon posting to the Site.

14. Contact Us

If you have any questions about our practices or this Privacy Notice, please contact us at AnthologyPrivacy@ca-anthology.com. You may also write to us at:

Anthology Senior Living
2401 E 2nd Ave, Suite 500
Denver, CO 80206
USA