



Resident Privacy Policy - Canada

Sunrise North Senior Living Ltd. (referred to with its affiliates in this Privacy Policy collectively as “**Sunrise**”), is committed to protecting the privacy of our residents, in compliance with applicable laws and in line with our overall approach to providing senior care. Sunrise has long been known for its excellence, integrity and ethical behavior in championing quality of life for seniors and appreciates that privacy is a part of this equation.

Application/Updating of this Policy

In this Privacy Policy (“Policy”), “personal information” means information, in any medium or format, held by Sunrise, about an identifiable individual who is a resident of a Sunrise community in Canada, and that is subject to the privacy law applicable to that community. Personal information includes personal health information, (which is subject to its own privacy law in some provinces), which Sunrise maintains in a separate record for ease of reference by health care providers. Sunrise has a separate privacy policy applicable to personal information collected through its website. Sunrise will amend this Policy as required to keep it current with our personal information management practices and applicable laws. This Policy is effective as of the date provided below.

The collection, use, and disclosure of certain personal information are necessary to provide our residents with accommodation and services. By becoming a resident in a Sunrise community in Canada, individuals are consenting to the collection, use, and disclosure of their personal information in accordance with this Policy and applicable law and cannot opt-out of the collection, use, and disclosure of their personal information for purposes permitted or required by applicable law or set out in this Policy, unless otherwise provided. Your consent is required for the collection, use or disclosure of your personal information for discretionary purposes, for example, for use in our marketing or promotional materials. Sunrise will advise you if we wish to use your personal information for discretionary purposes, and you may decline your consent to such use. Additional information about consent is provided below.

Questions about Sunrise’s privacy program

The Executive Director of each Community will be its Community Privacy Representative. Any general questions regarding Sunrise’s privacy program or questions specific to a resident’s personal information should be directed to the Community Privacy Representative. Community Privacy Representatives may discuss any privacy-related matter with our Corporate Privacy Officer in the U.S. as part of our quality control process for our privacy program.

Sunrise’s collection, use and disclosure of personal information

Sunrise collects, uses, and discloses personal information to the extent required for the following purposes and activities.

- (1) In connection with the provision of **accommodation**, for purposes that include but are not limited to:
 - Processing applications for residence and creating a file for each resident;
 - Keeping a record of the accommodation provided to a resident including maintenance and repairs and any concerns of a resident in connection with food services, supplies, equipment, programs and facilities;
 - Keeping a record of expenses incurred by a resident and billing;

- Keeping a record of resident activities, including participation in any special programs or events; and
 - All other administrative activities and requirements associated with the accommodation, programs and services provided to a resident other than health care services.
- (2) In connection with **health care**, for purposes that include but are not limited to:
- Coordinating, providing and/or managing health care, including identifying health care needs and resident preferences and instructions;
 - Monitoring and evaluating health care received by a resident;
 - Communication with a resident’s health care providers for purposes including consultation and referral of the resident to the providers;
 - Contacting a resident’s substitute decision maker or family;
 - Determining eligibility and coverage for insurance and other benefits;
 - Obtaining payment or reimbursement for health care;
 - Keeping records required by law; and
 - Responding to inquiries from governmental programs or authorities.
- (3) In connection with our **business administration**, for purposes that include but are not limited to:
- Complying with regulatory and other legal requirements;
 - Maintaining required certification, licenses and accreditation;
 - Quality assurance activities including evaluating the performance of our staff;
 - Corporate planning, risk management, resource allocation;
 - Audits, inspections and investigations;
 - Legal and other proceedings;
 - Obtaining and maintaining insurance coverage and making claims; and
 - Any contemplated or actual restructuring or reorganization of our business or operations, including an assignment, sale, merger or other transaction involving all, substantially all or a part of our business or operations and the due diligence required to determine whether to proceed with any such transaction.

Where a family member assists or otherwise attends to matters for a resident, for example, financial matters or health care, Sunrise will assume it may share relevant personal information with that family member unless otherwise instructed by the resident. In such cases, Sunrise may ask a resident to identify another representative to ensure continuity of care and other services. Sunrise requests that all residents identify an individual with the authority to act on their behalf in the event that they are unable to do so, including to provide consent to the use and disclosure of personal information. It is the responsibility of residents to communicate any change in their authorized representative to Sunrise.

Where permitted or required by law, for example to prevent harm to a resident or someone else, Sunrise may use and disclose personal information without consent.

Sunrise’s use of external service providers

Sunrise transfers or permits access to personal information to external service providers (“**Service Providers**”) where their services require its use. Sunrise uses Service Providers to take advantage of their specialization and expertise. Sunrise may also engage its parent company (including affiliates and subsidiaries of its parent) to assist it in providing the activities described in paragraphs 1 through 3 above. Sunrise selects its Service Providers with care and requires them, through contracts, to protect and restrict their use of personal information. Some of Sunrises’ Service Providers, including its parent, operate in the U.S. Personal information made available to such Service Providers will be subject to U.S. as well as Canadian law and may be disclosed pursuant to either or both laws, including to governments in either or both countries and their agencies.

Consent

As noted above, there are circumstances in which Sunrise is permitted or required by law to use or disclose personal information without consent or to assume that it has consent. Resident consent may be obtained separately for particular programs or services that are not identified in this Policy.

Protection of personal information

Sunrise employs a variety of means to protect personal information; some protect our physical facilities, others impose rules and procedures on our staff and Service Providers, and still others protect our electronic information technology systems and records. Our security measures may vary from community to community to address the requirements of particular facilities, although the following safeguards apply across our communities in Canada.

We restrict the use of personal information by our staff to that required for the purposes identified to residents. We have assigned responsibility for our personal information management to local Community Privacy Representatives. We provide privacy training to our staff and enforce our privacy policies and procedures. Our privacy program includes procedures for receiving and processing privacy-related inquiries, concerns and complaints, processing requests for access and the correction of personal information, and the management of any privacy breach or security breach that could have an impact on personal information. We have dedicated staff responsible for our information technology systems and assess the sufficiency of our systems security from time to time.

We maintain resident personal information in the community in which residents live, although a back-up copy may be stored elsewhere, including with our Service Providers in the U.S.

Access and correction of personal information

Except where the law permits or requires otherwise, residents are entitled to access a copy of their personal information on request to their Community Privacy Representative. We will make a reasonable effort to locate the information to which access has been requested. In accordance with retention periods and other requirements, policies and procedures, we may not have retained a record of all of the personal information we receive about a resident.

We ask that requests for access be made in writing to permit us to keep a record of the release of personal information (including to the resident to whom it relates). Staff will assist residents in making a written request if asked to do so. In the event that Sunrise refuses a request for access, Sunrise will provide its reasons for doing so. As set out below, residents may ask the privacy commissioner who administers the law applicable in their province to review the refusal. The rules differ from province to province, but where there will be a fee for duplication of records, Sunrise will tell you and will provide an estimate prior to processing the request.

Sunrise will correct or update personal information in its records where it agrees that there is a need to do so. Sunrise is not required and will not make changes to information that reflects the observations or professional judgment of a health care provider, except with his or her approval, as maintaining the integrity of such information may be critical to protecting a resident and the members of his or her health care team.

Sunrise will process requests for access and correction as quickly as possible and except in usual circumstances to which Sunrise will alert the resident, within 30 days of receiving a request.

Retention of personal information

In general, Sunrise maintains records of personal information for 7 years. A number of circumstances may make it necessary or prudent for Sunrise to retain personal information after the retention period has expired, including where the records document health care provided to a resident.

Contact Information

Contact information for the Executive Director/Community Privacy Representative will be provided in the orientation package provided to residents and may also be obtained from staff in a community. A resident may obtain additional information about Sunrise’s privacy program, make a request for access or correction to his or her personal information or request that Sunrise review its management of personal information by contacting his or her Community Privacy Representative. Residents may also request a review of Sunrise’s compliance with privacy law by the applicable privacy commissioner.

This Policy is effective as of November 5, 2013.