



Sunrise Senior Living, LLC

EU-U.S. Privacy Shield: Consumer Privacy Policy

Last Updated: April 26, 2019

Sunrise Senior Living, LLC and its subsidiary, Sunrise Senior Living Management, Inc., (collectively, “Sunrise”) respect your concerns about privacy. Sunrise participates in the EU-U.S. Privacy Shield (the “Privacy Shield”) framework issued by the U.S. Department of Commerce. Sunrise commits to comply with the Privacy Shield Principles with respect to Consumer Personal Data the company receives from the EU and UK in reliance on the Privacy Shield. This Policy describes how Sunrise implements the Privacy Shield Principles for Consumer Personal Data.

For purposes of this Policy:

“Consumer” means any natural person who is located in the EU or UK, but excludes any individual acting in his or her capacity as an Employee.

“Controller” means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“Employee” means any current, former or prospective employee, contractor, intern or temporary worker of Sunrise or its EU or UK affiliates, or any related individual whose Personal Data Sunrise processes in connection with an employment relationship, who is located in the EU or UK.

“EU” means the European Union and Iceland, Liechtenstein and Norway.

“Personal Data” means any information, including Sensitive Data, that is (i) about an identified or identifiable individual, (ii) received by Sunrise in the U.S. from the EU or UK, and (iii) recorded in any form.

“Privacy Shield Principles” means the Principles and Supplemental Principles of the EU-U.S. Privacy Shield framework.

“Processor” means any natural or legal person, public authority, agency or other body that processes Personal Data on behalf of a Controller.

“Sensitive Data” means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (including trade union-related views or activities), sex life (including personal sexuality), information on social security measures, the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of



such proceedings, or the sentence of any court in such proceedings (including administrative proceedings and criminal sanctions).

“UK” means the United Kingdom.

Sunrise’s Privacy Shield certification, along with additional information about the Privacy Shield, can be found at <https://www.privacyshield.gov/>. For more information about Sunrise’s processing of Consumer Personal Data, please visit Sunrise’s Privacy Policy available at <https://www.sunriseseniorliving.com/>

Types of Personal Data Sunrise Collects and Uses

Sunrise obtains Personal Data about Consumers in various ways. For example, Sunrise collects Personal Data directly from Consumers (including residents and their responsible parties) in connection with Consumers’ residencies or prospective residencies at Sunrise, their use of Sunrise’s websites, and in other ways described in Sunrise’s Privacy Policy available at <https://www.sunriseseniorliving.com/>

Sunrise uses this information for responding to Consumer requests for information from Sunrise about its products, services, and programs, and for providing and delivering services, IT application support, internal audits and investigations, quality assurance, program monitoring, management reporting, and other internal purposes, such as helping develop, deliver and improve Sunrise’s products and services.

The types of Personal Data Sunrise collects directly from Consumers includes:

- Name
- Address
- Email
- Telephone
- Room Number
- Community Name
- Date of Birth
- Dietary Information
- Gender
- Marital Status
- Photograph
- Residential Status
- Residential Account Number
- Client ID Number
- National Insurance Number
- NHS Number
- Online Identifiers (IP Address)
- Bank Details
- Personal Assets



- Personal Liabilities
- Residence Account Balance
- Ethnic Origin
- Health Information
- Religion
- Enquirer Details
- GP Details
- Guarantor Details
- NOK Details
- POA Details
- Responsible Party Details
- Spouse Details
- Date of Admission
- Personal Data collected automatically through Sunrise's websites (such as IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on Sunrise's websites, and dates and times of activity)

In addition, Sunrise obtains Personal Data, such as contact and banking information, including VAT registration number or other relevant information, of its vendors' representatives. Sunrise uses this information to manage its relationships with its vendors, process payments, and carry out Sunrise's contractual obligations.

Sunrise also may obtain and use Consumer Personal Data in other ways for which Sunrise provides specific notice at the time of collection.

Sunrise's privacy practices regarding the processing of Consumer Personal Data comply with the Privacy Shield Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability.

Notice

Sunrise provides information in this Policy and the company's Privacy Policy available at <http://www.sunriseseniorliving.com/> about its Consumer Personal Data practices, including the types of Personal Data Sunrise collects, the types of third parties to which Sunrise discloses the Personal Data and the purposes for doing so, the rights and choices Consumers have for limiting the use and disclosure of their Personal Data, and how to contact Sunrise about its practices concerning Personal Data.

Relevant information also may be found in notices pertaining to specific data processing activities.

Choice

Sunrise generally offers Consumers the opportunity to choose whether their Personal Data may be (i) disclosed to third-parties other than agents of Sunrise or (ii) used for a purpose that is



materially different from the purposes for which the information was originally collected or subsequently authorized by the relevant Consumer. To the extent required by the Privacy Shield Principles, Sunrise obtains opt-in consent for certain uses and disclosures of Sensitive Data. Consumers may contact Sunrise as indicated below regarding the company's use or disclosure of their Personal Data. Unless Sunrise offers Consumers an appropriate choice, the company uses Personal Data only for purposes that are materially the same as those indicated in this Policy.

Sunrise shares Consumer Personal Data with its affiliates and subsidiaries. Sunrise may disclose Consumer Personal Data without offering an opportunity to opt out, and may be required to disclose the Personal Data, (i) to third-party Processors the company has retained to perform services on its behalf and pursuant to its instructions, (ii) if it is required to do so by law or legal process, or (iii) in response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements. Sunrise also reserves the right to transfer Personal Data in the event of an audit or if the company sells or transfers all or a portion of its business or assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution or liquidation).

Accountability for Onward Transfer of Personal Data

This Policy and Sunrise's Privacy Policy available at <https://www.sunriseseniorliving.com/> describe Sunrise's sharing of Consumer Personal Data.

Except as permitted or required by applicable law, Sunrise generally offers Consumers the opportunity to choose whether their Personal Data may be disclosed to third-parties other than agents of Sunrise. Sunrise requires third-party Controllers to whom it discloses Consumer Personal Data to contractually agree to (i) only process the Personal Data for limited and specified purposes consistent with the consent provided by the relevant Consumer, (ii) provide the same level of protection for Personal Data as is required by the Privacy Shield Principles, and (iii) notify Sunrise and cease processing Personal Data (or take other reasonable and appropriate remedial steps) if the third-party Controller determines that it cannot meet its obligation to provide the same level of protection for Personal Data as is required by the Privacy Shield Principles.

With respect to transfers of Consumer Personal Data to third-party Processors, Sunrise (i) enters into a contract with each relevant Processor, (ii) transfers Personal Data to each such Processor only for limited and specified purposes, (iii) ascertains that the Processor is obligated to provide the Personal Data with at least the same level of privacy protection as is required by the Privacy Shield Principles, (iv) takes reasonable and appropriate steps to ensure that the Processor effectively processes the Personal Data in a manner consistent with Sunrise's obligations under the Privacy Shield Principles, (v) requires the Processor to notify Sunrise if the Processor determines that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles, (vi) upon notice, including under (v) above, takes reasonable and appropriate steps to stop and remediate unauthorized processing of the Personal Data by the Processor, and (vii) provides a summary or representative copy of the relevant privacy provisions of the Processor contract to the Department of Commerce, upon request. Sunrise remains liable under the Privacy Shield Principles if the company's third-party Processor



onward transfer recipients process relevant Personal Data in a manner inconsistent with the Privacy Shield Principles, unless Sunrise proves that it is not responsible for the event giving rise to the damage.

Security

Sunrise takes reasonable and appropriate measures to protect Consumer Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal Data.

Data Integrity and Purpose Limitation

Sunrise limits the Consumer Personal Data it processes to that which is relevant for the purposes of the particular processing. Sunrise does not process Consumer Personal Data in ways that are incompatible with the purposes for which the information was collected or subsequently authorized by the relevant Consumer. In addition, to the extent necessary for these purposes, Sunrise takes reasonable steps to ensure that the Personal Data the company processes is (i) reliable for its intended use, and (ii) accurate, complete and current. In this regard, Sunrise relies on its Consumers to update and correct the relevant Personal Data to the extent necessary for the purposes for which the information was collected or subsequently authorized. Consumers may contact Sunrise as indicated below to request that Sunrise update or correct relevant Personal Data.

Subject to applicable law, Sunrise retains Consumer Personal Data in a form that identifies or renders identifiable the relevant Consumer only for as long as it serves a purpose that is compatible with the purposes for which the Personal Data was collected or subsequently authorized by the Consumer.

Access

Consumers generally have the right to access their Personal Data. Accordingly, where appropriate, Sunrise provides Consumers with reasonable access to the Personal Data Sunrise maintains about them. Sunrise also provides a reasonable opportunity for those Consumers to correct, amend or delete the information where it is inaccurate or has been processed in violation of the Privacy Shield Principles, as appropriate. Sunrise may limit or deny access to Personal Data where the burden or expense of providing access would be disproportionate to the risks to the Consumer's privacy in the case in question, or where the rights of persons other than the Consumer would be violated. Consumers may request access to their Personal Data by contacting Sunrise as indicated below.

Recourse, Enforcement and Liability

Sunrise has mechanisms in place designed to help assure compliance with the Privacy Shield Principles. Sunrise conducts an annual self-assessment of its Consumer Personal Data practices to verify that the attestations and assertions Sunrise makes about its Privacy Shield privacy



practices are true and that Sunrise’s privacy practices have been implemented as represented and in accordance with the Privacy Shield Principles.

Consumers may file a complaint concerning Sunrise’s processing of their Personal Data. Sunrise will take steps to remedy issues arising out of its alleged failure to comply with the Privacy Shield Principles. Consumers may contact Sunrise as specified below about complaints regarding Sunrise’s Consumer Personal Data practices.

If a Consumer’s complaint cannot be resolved through Sunrise’s internal processes, Sunrise will cooperate with JAMS pursuant to the JAMS Privacy Shield Program, which is described on the JAMS website at <https://www.jamsadr.com/eu-us-privacy-shield> . JAMS mediation may be commenced as provided for in the JAMS rules. Following the dispute resolution process, the mediator or the Consumer may refer the matter to the U.S. Federal Trade Commission, which has Privacy Shield investigatory and enforcement powers over Sunrise. Under certain circumstances, Consumers also may be able to invoke binding arbitration to address complaints about Sunrise’s compliance with the Privacy Shield Principles.

How to Contact Sunrise

To contact Sunrise with questions or concerns about this Policy or Sunrise’s Consumer Personal Data practices:

Write to:

United States	United Kingdom
Sunrise Senior Living, LLC Attn: Legal Department 7902 Westpark Drive McLean, VA 22102 U.S.A. Email: PrivacyShield@sunriseseniorliving.com	Sunrise House Attn: Data Protection Officer Post Office Lane Beaconsfield Buckinghamshire HP9 1FN E-mail: dpo@sunriseseniorliving.com