

	<p>Corporate Policy GOV-075</p> <p>Safe Harbor Privacy</p>	<p>Revision Date: March 7, 2014</p> <p>Prepared By: Nancy Voisin</p> <p>Approved By: Farinaz Tehrani</p>
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1.0 Policy Statement

As part of our commitment to protect personal privacy, Sunrise Senior Living adheres to the Safe Harbor Principles administered by the United States Department of Commerce in consultation with European Commission. To learn more about the Safe Harbor program, and to view Sunrise Senior Living's certification status, please visit: <http://www.export.gov/safeharbor/>

2.0 Scope

This Policy applies to Sunrise Senior Living, LLC. and any of its U.S. and non-U.S. subsidiaries and divisions, collectively, the "Company", that receive personal information that is gathered in the European Economic Area (E.E.A.) and then transferred to the United States. The Company is committed to following the principles of the Safe Harbor for all Personal Information that falls within its scope. However, certain other information in the Company's possession may be subject to other Company policies and laws, and those may differ in some respects from the general policies set forth herein.

3.0 Definitions

Agent—any third party that processes, collects, or uses Personal Information pursuant to the instructions of, and solely for the benefit of, the Company, or to which the Company discloses Personal Information for use on its behalf.

Personal Information—information that is transferred from the E.E.A. to the United States, is recorded in any form, and which contains information about a specific individual that identifies or reasonably may identify that individual. Personal Information does not include: (i) anonymized information or aggregate information to the extent an individual's identity cannot reasonably be derived from such information; (ii) uses of information to which an individual has explicitly consented; and (iii) public information to the extent contemplated by the Safe Harbor Principles.

Sensitive personal information—personal information that reveals a natural person's race, ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or that concerns a natural person's sex life or mental or physical health.

4.0 General Policy

This Policy reflects the Company's privacy principles based on the Safe Harbor principles. All policies are effective for Personal Information collected on or after the issue date of this policy.

For information describing how the Company collects and uses information about people visiting our website, click here: <http://www.sunriseseniorliving.com/privacy-policy.aspx>. The principles of the Company's Safe Harbor Policy apply to Personal Information collected through our website in the E.E.A. that is transmitted to the United States.

4.1 Notice

Beginning on the issue date of this policy, when individuals are first asked to provide their Personal Information or as soon as reasonably practicable thereafter, the Company will notify the individuals about the purposes for which it collects their Personal Information, the types of third parties to which it may disclose their Personal Information, information on how to contact the Company with inquiries and complaints

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about the use of the information, and the choices and means offered by the Company to limit the use and disclosure of information. The Company will also provide notice to affected individuals before the Company uses the information or discloses the information to a third party for a purpose other than the purpose for which it was collected unless such notice is prohibited by law.

4.2 Choice

With respect to Personal Information collected in the E.E.A. and transferred to the U.S., the Company will offer individuals the choice to opt out of having their Personal Information disclosed to a third party that is not an Agent or used for purposes other than those for which it was originally collected.

With respect to Sensitive Personal Information collected in the E.E.A. and transferred to the U.S., unless the Safe Harbor Principles allow otherwise, the Company will offer individuals the choice to opt in to having their Sensitive Personal Information disclosed to a third party that is not an Agent or used for a purpose other than for which it was originally collected.

An individual's refusal to allow the Company to use information for a purpose other than that for which it was originally collected or a refusal or withdrawal of consent to use such information will not result in retaliation or punitive action against that individual.

4.3 Onward Transfer

The Company will obtain reasonable assurances from its Agents that they will have appropriate safeguards to protect Personal Information. With respect to Personal Information collected in the E.E.A. and transferred to the U.S., the Company will obtain reasonable assurances from its Agents that they will safeguard Personal Information consistent with the Safe Harbor Principles. Reasonable assurances may include a contract obliging the Agent to afford a level of protection to the Personal Information that meets or exceeds the Safe Harbor Principles or Safe Harbor certification by the Agent or the Agent being subject to EU Directive 95/46/EC or any other law deemed to provide an adequate level of privacy protection.

If the Company transfers Personal Information to a third party that is not an Agent, the Company will provide individuals with appropriate notice and the choice to opt out of the disclosure. Such notice and choice may be provided at the time the data is collected or at a later time.

4.4 Security

The Company will take reasonable measures to protect Personal Information from loss, misuse, and unauthorized disclosure, access, alteration, and destruction. The Company safeguards information according to reasonable security standards and periodically assesses new technology for methods of protecting information. However, the Company cannot guarantee the security of Personal Information, especially information on or transmitted via the Internet.

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4.5 Access to Records

Upon an individual's request, the Company will offer individuals reasonable access to their Personal Information and will afford individuals a reasonable opportunity to correct, amend, or delete inaccurate information. For security purposes, the Company may require individuals to provide information that verifies their identity before processing the request. The Company may limit or deny access to Personal Information where providing such access would be unreasonably burdensome or expensive under the circumstances or as otherwise permitted by the Safe Harbor Principles.

4.6 Data Integrity

The Company will only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or as authorized by the individual. The Company will take reasonable measures to ensure that Personal Information is reliable for its intended use, accurate, complete, and current.

4.7 Enforcement and Dispute Resolution

The Company will conduct periodic assessments to confirm the accuracy of, and verify its adherence to, this Policy. The Company will investigate suspected infractions. Any employee that the Company determines to be in violation of this Policy may be subject to disciplinary action, which may include termination of employment, subject to and in accordance with applicable law.

4.8 Limitations

This policy applies only to information gathered in the E.E.A. and transferred to the United States. Information collected and processed within the United States is subject to U.S. law and applicable Company policies. The Company's adherence to the Safe Harbor Principles may be limited by any applicable legal, regulatory, ethical, or public interest consideration, and as expressly permitted or required by any applicable law, rule, or regulation. Examples of such limitations include, but are not limited to, exceptions to the opt-in requirements for Sensitive Personal Information permitted by Commission Decision 2000/520/EC of 26 July 2000, exceptions on access as permitted by Safe Harbor Principles, or under applicable European Economic Area Member State law. The Company also may disclose Personal Information reasonably related to the sale or disposition of all or part of its business, subject to and in accordance with applicable law.

5.0 Modifications

This Policy may be amended from time to time with or without notice in accordance with the Safe Harbor Principles. Any modified policy will be posted on the Company's website.

6.0 Contact Information

If you have any questions, concerns or complaints regarding this policy, you should contact the General Counsel. If you have any questions, concerns, or complaints about the use of Personal Information by the Company, contact the individual listed below. The Company will conduct a

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reasonable investigation of and will attempt to resolve any complaints in accordance with the principles contained in this Policy. For complaints that cannot be resolved between the Company and the complainant, the Company agrees to participate in the dispute resolution procedures of the panel established by the European Data Protection Authorities to resolve disputes pursuant to the Safe Harbor Principles.

Any questions regarding this policy, or suggestions for changes should be directed to the General Counsel.

7.0 Policy Version History

Publish Date	Revision Number	Revision Description	Author	Approval
11/05/13	1.0	Policy review post transition to private company.	N. Voisin	F. Tehrani
03/07/14	1.1	Section 1.0 updated to provide link to Sunrise's certification.	N. Voisin	F. Tehrani