

1. OUR COMMITMENT TO PRIVACY

This Privacy Policy (the “Policy”) describes the practices of Chartwell Retirement Residences and our subsidiaries and affiliates (collectively, “Chartwell,” “we,” or “us”) in relation to the collection, use, disclosure, retention and protection of Personal Information, as well as the rights you may have with respect to your Personal Information. We strive to be open and transparent regarding how we handle your Personal Information.

This Policy applies to Personal Information Chartwell collects about prospective and current residents, occupants and guarantors under residency agreements, visitors to the Chartwell website at <https://chartwell.com/> (the “Website”) and job applicants (collectively “individual” or “you”).

2. WHAT IS PERSONAL INFORMATION?

Personal Information is “any information about an identifiable individual”, which alone or in combination with other information, could be used to identify a person. This may include contact or demographic information, information relating to your communications with us or more technical information (such as users’ IP addresses, usernames), but only when this information can identify you as an individual. Personal Information does not include Personal Information that has been anonymized and/or aggregated such that the data cannot be connected to a particular person, and the professional contact information within an organization.

3. WHAT PERSONAL INFORMATION DOES CHARTWELL COLLECT?

Chartwell limits the collection of Personal Information to that which is reasonably necessary to fulfill the purposes for which it was collected. Chartwell may collect, use and disclose different kinds of Personal Information, grouped together as follows:

- **“Browsing Activity”** on the Website, such as page and offers viewed, opt-out preferences, email bounce backs, click-throughs, content on social media, and IP addresses.
- **“Contact Data”** such as invoicing address, email address and telephone numbers.
- **“Financial Data”** includes bank account and payment card details.
- **“Identity Data”** such as your name, marital status, date of birth, gender, sexual orientation, racial or ethnic origin and religious beliefs.
- **“Marketing and Communications Data”** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **“Personal Health Information”** any information relating to health and health care including, health history, health care programs and services, health care providers, substitute decision-makers, health card number and other personal identification numbers.
- **“Preference Data”** includes information about your preferences as regards accommodation, food, care services in order to enable us to provide care to you in a way that best suits your needs.
- **“Recruitment Data”** includes information included on resumes and job applications for recruitment purposes such as past employment experience, education, training, languages spoken etc.
- **“Security Data”** includes identity and contact information records (including times of entry and departure from Chartwell), video and CCTV footage collected at or around Chartwell.

- **"Transaction Data"** includes details about payments to and from you and other details of services we have provided to you.

4. HOW DOES CHARTWELL COLLECT PERSONAL INFORMATION?

We use different methods to collect Personal Information, including:

- **Directly From You.** You may provide Personal Information to Chartwell in our residences, by email, over the telephone, through our website or in any other direct manner.
- **From Other Sources.** Occasionally, we may receive Personal Information from other sources. This includes your family, your legal representative(s), your current or previous medical facilities and providers, the health authority or government agencies.
- **Information Collected Via Website.** When you visit the Website, we may use electronic means such as cookies, to collect technical information about your browser or device, and about your usage of such websites, mobile apps, IT systems and/or Wi-Fi. This information may include information about your visit or usage, including the IP address of your device/computer, the browser you used to access our websites, mobile apps, IT systems or Wi-Fi, your operating system, your mobile device's MAC address, resolution of screen, language settings in browsers, the site you came from, keywords searched (if arriving from a search engine), the number of pages viewed, as well as information you captured and advertisements you saw. We may also employ the following online technologies:
 - Google Analytics. We use Google Analytics which allows Chartwell to see information on users' online activities including, but not limited to, page views, source and time spent on our websites and/or mobile apps. This information is depersonalized and is displayed as numbers, meaning that it cannot be tracked back to a particular individual. You may opt-out of the use of Google Analytics by visiting the [Google Analytics opt-out page](#).
 - Google Adwords. We use Google AdWords remarketing to advertise Chartwell across the Internet and to advertise on third party websites (including Google) to previous visitors to our Website. AdWords remarketing will display ads to you based on what parts of the Chartwell website you have viewed by placing a cookie on your web browser. It could mean that we advertise to previous visitors who haven't completed a task on our site or that we advertise on the Google search results page, or a site in the Google Display Network. This cookie does not in any way identify you or give access to your computer or mobile device. The cookie is only used to indicate to other websites that you have visited a particular page on our websites, so that they may show you ads relating to that page. If you do not wish to participate in our Google AdWords remarketing, you can opt out by visiting [Google's Ads Preferences Manager](#).
- **Social Media Networks.** We may collect your Personal Information if you interact with us through our social media pages and accounts (e.g. Facebook, Twitter, Instagram). For instance, we collect the Personal Information these social media platforms allow us to collect from our followers. We may also collect any content you upload to our social media pages and accounts (including photos or videos).
- **Technologies at our Residences.** We may collect Personal Information through various types of technologies used in our residences and offices. These can include video surveillance, common area Wi-Fi service (how often, how long and from which one of our residences you are accessing the Wi-Fi services), biometric sensors and/or other similar types of systems that we may use from time to time.
- **Video Surveillance.** As a security measure for our properties and in order to ensure the safety of our guests, tenants, retailers and occupants of our properties, we may use video surveillance at various locations on our premises. For example, when you visit certain residences, we may capture

or collect photographs and record audio and video at the residence (including through the use of CCTV cameras and other technologies).

- **Employment Applications.** We may collect the information which you have included in your resume when you submit a job application or when you apply for a position with Chartwell.

5. WHY AND FOR WHAT PURPOSE DOES CHARTWELL USE PERSONAL INFORMATION?

Chartwell uses the collected Personal Information in order to provide residential, recreational and health care services, understand, improve, and develop our services and the Website, make hiring decisions, and complying with our legal obligations, including:

- assessing a residency application and determining eligibility for living at a Chartwell residence;
- managing a tenancy and enforcing a residency agreement;
- arranging services or utility connections;
- providing individuals with health care and other related services;
- communicating with other service providers and agents;
- making decisions about the types of services required by residents;
- monitoring the provision of services and evaluating the resident's response to services provided;
- administering quality control and risk management programs;
- seeking payment for health care, services or products;
- compiling statistics, conducting market research and reporting to regulatory and industry agencies;
- evaluating your qualifications and suitability for the desired position and processing and responding to your application, considering you for future job opportunities; and
- meeting relevant regulatory, legal, insurance, audit, and security requirement.

6. HOW DOES CHARTWELL HANDLE CONSENT?

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate or otherwise permitted by applicable law. Chartwell will take into account the sensitivity of the Personal Information when determining the appropriate form and method of obtaining consent, including requesting express consent for the collection of sensitive personal information (i.e., information that is sensitive due to its nature or the context of its use or disclosure, requiring high levels of protection under reasonable expectations).

When you provide your Personal Information to Chartwell, you are providing your consent to the collection, use and disclosure of your Personal Information as set out in this Policy and as otherwise permitted or required by law. Consent can be obtained in person, by phone, via email, by signature or by other lawful means.

Consent to the collection, use and disclosure of Personal Information is given for specific purposes or for general purposes consistent with those for which it was collected.

In some circumstances consent is implied through the individual relationship or conduct i.e. your permission is assumed based on your action or inaction at the point of collection, use or sharing of your Personal Information. Your consent can also be provided through an authorized representative such as an attorney, substitute decision maker or another designated individual. In the case of sensitive Personal Information (e.g. health information), consent must be expressly given.

In certain circumstances, your Personal Information may be collected, used or disclosed without consent in case of an emergency, when authorized by law (for example, to detect or prevent fraud or an illegal activity) or when required to comply with a court order or a similar type of requirement.

You are able to withdraw your consent with reasonable notice at any time, subject to legal or contractual restrictions. Upon receipt of a notice of withdrawal of consent, we will inform you of the likely consequences of the withdrawal of consent, which may include our inability to provide services for which that information is necessary.

If you do not consent to the collection, use and disclosure of your Personal Information please do not provide any Personal Information to Chartwell.

7. HOW DOES CHARTWELL USE AND SHARE PERSONAL INFORMATION?

Chartwell does not use or disclose Personal Information other than for the purposes for which it was collected in accordance with this Policy. We may share Personal Information as outlined below and in accordance with applicable law:

- a) **Within Chartwell:** Chartwell affiliates and subsidiaries may share Personal Information with each other and use it for the purposes described in this Policy.
- b) **Third Parties:** Chartwell may share Personal Information with third parties that provide services or products, support operations, or otherwise help Chartwell carry out activities in furtherance of its service offerings (e.g., health care providers and professionals, Provincial and local health authorities) or to the extent Chartwell employs third-party service providers to store, handle or process Personal Information on our behalf (e.g., data storage and processing, cloud computing, application hosting and health record solution services etc.). Where your personal data is transferred to third parties, we will require such persons to protect your Personal Information in accordance with applicable law (including by putting in place appropriate contractual arrangements with the agreements between Chartwell and third-party vendors).
- c) **Sale or transfer of business:** We may share your Personal Information where reasonably required in the context of a financing, sale, merger, reorganization or amalgamation of all or part of Chartwell's business. In the event a transaction is completed, your Personal Information will remain protected by applicable privacy laws. If the transaction is not completed, we will ask the other party not to use or communicate your Personal Information in any way and to delete this information.
- d) **Other permitted grounds:** We are also authorized to share your Personal Information to third parties without your consent as required or permitted by law, such as where the information is disclosed for the purpose of an investigation or legal proceedings, when requested by a regulatory college or agency, when assisting government agencies or law enforcement.
- e) **With Your Consent:** In addition to the purposes listed above. We may, with your express or implied consent, share or disclose your personal information for other purposes.

8. DOES CHARTWELL TRANSFER PERSONAL INFORMATION TO OTHER JURISDICTIONS?

Chartwell is headquartered in Canada and your Personal Information is stored in secured locations and on servers controlled by Chartwell or our service providers, located either at our facilities in and outside of Quebec, or at the facilities of our service providers in Canada, located in and outside of Quebec.

Notwithstanding the foregoing, Chartwell reserves the right to transfer and process Personal Information on a global and worldwide basis when necessary to operate our business, meet our contractual obligations and comply with our legal and regulatory obligations. In such cases, Chartwell

will use reasonable safeguards to ensure the protection of your Personal Information wherever it is used or stored and to ensure that any international transfer of Personal Information is carried out in accordance with applicable privacy laws.

The protection of such Personal Information will be subject to the legal requirements of the jurisdictions where the information is transferred, including lawful requirements to disclose information to government authorities in those countries.

9. HOW LONG DOES CHARTWELL STORE AND SAFEGUARD PERSONAL INFORMATION?

Chartwell retains Personal Information so long as we have an ongoing legitimate business need to do so (for example, to provide you with the services, to comply with applicable legal, tax or accounting requirements, to resolve disputes, or as otherwise permitted or required under applicable law).

When we have no ongoing legitimate need to process your Personal Information or are required under the applicable law, we will delete it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible. We may also further retain Personal Information in an anonymous or aggregated form where that information would not identify you personally.

a) SAFEGUARDS OF PERSONAL INFORMATION

Chartwell uses physical, electronic and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Information in our custody or control.

The nature of the security safeguards will vary depending on the amount of information, distribution method, format, and method of information storage employed. Information will be safeguarded using measures appropriate to the Personal Information involved.

Chartwell has agreements and controls in place with third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the service provider to perform.

Employees with access to Personal Information are required, as a condition of employment, to safeguard Personal Information viewed or handled by them and to complete a privacy training course.

b) PRIVACY INCIDENT AND BREACH MANAGEMENT

Chartwell takes all reasonable measures to address any access, collection, use, disclosure, copying, modification, retention or disposal of Personal Information in our systems in accordance with relevant legislation.

In the event of a Privacy Incident, Chartwell will take reasonable measures to contain and mitigate such a breach and ascertain its harm to individuals whose Personal Information has been affected and issue all required notifications through a clear communications and escalation process in accordance with relevant legislation.

10. WHAT RIGHTS TO YOU HAVE?

In accordance with applicable law, you have the following rights, subject to some conditions and exceptions:

- To access a copy of your Personal Information and details about how Chartwell uses it.
- To have your Personal Information corrected or updated.
- To request deletion of your Personal Information. If Chartwell receives such a request, other factors will need to be taken into account when assessing whether to comply.
- To withdraw consent to the collection, use, or disclosure of your Personal Information
- To request that your Personal Information be provided to you in a structured, commonly used technological format.
- To request that your Personal Information be disclosed to another organization authorized to collect it.

All requests regarding your Personal Information should be sent to Chartwell's Privacy Office or the General Manager of the Residence in which you live.

Chartwell will respond to such requests within thirty (30) business days of their receipt or within any other delay required or authorized by applicable law. Chartwell will take reasonable steps to functionally correct or delete your Personal Information from Chartwell database(s) upon request, although Chartwell may keep a copy for archival purposes in compliance with applicable laws. Before Chartwell provides you with any Personal Information, corrects any inaccuracies or deletes any Personal Information, Chartwell may request additional information to verify your identity or otherwise help respond to your request.

HOW TO CONTACT CHARTWELL'S PRIVACY OFFICER?

Chartwell's Privacy Office manages and administer all matters relating to protecting the privacy of individual's Personal Information and can provide more information about any aspect of this Policy or about the way in which Chartwell operates to protect the privacy of your Personal Information.

Individuals may send a written request to:

Attention: Privacy Officer
Chartwell Retirement Residences
7070 Derrycrest Drive
Mississauga, Ontario L5W 0G5
or
privacyoffice@chartwell.com

If you have any questions regarding the access we have provided or wish to advise us of inaccuracies, you may speak directly to the General Manager at the Chartwell residence you live at or, you may escalate your request with our Privacy Officer at privacyoffice@chartwell.com.

11. HOW WILL I KNOW WHETHER CHARTWELL HAS UPDATED THIS POLICY?

Chartwell may update the Privacy Policy from time to time to reflect developments in its practices, new technology or the law. Any amendment to this Policy will be effective at the date of the amendment. All changes to the Policy will be posted on the Website. If the changes are significant, we will highlight them if required by applicable law.