

# California Consumer Protection Act Privacy Policy for Consumers

# Part I - Overview of Consumer Rights Under the CCPA

This "Privacy Policy – California Consumers" applies only to California consumers ("you" or collectively as "consumers") and supplements the Privacy Policy of Watermark Retirement Communities and any of its subsidiaries (collectively, "we," "us," or "our"). The California Consumer Privacy Act ("CCPA") provides California consumers with specific rights regarding their personal information. This Privacy Policy describes your rights under the CCPA and explains how you may exercise your rights.

# Your Rights Under the CCPA and this Privacy Policy

The CCPA provides you with the following rights:

- Right to know. You have the right to know what categories and specific pieces of personal
  information we collect about you, the sources of how we collect personal information, our
  business purpose for the collection and use of your personal information, and any categories of
  third parties with whom we share your information.
- Right to deletion. You have the right to request that we delete the personal information that we collect about you.
- **Right to opt-out.** If we sell any of your personal information, you have the right, at any time, to tell us not to sell your personal information.
- **Right to nondiscrimination.** If you exercise any of your CCPA rights, we will not discriminate against you.

The CCPA allows you to request your information, at no cost, up to twice during a twelve (12) month period. We will provide our response in a readily usable format, which is usually electronic. If you have any questions, please contact us.

# **How to Contact Us About Your CCPA Rights**

**Ways to Contact Us.** If you would like to exercise your CCPA rights (right to know, right to deletion, right to opt out, right to nondiscrimination), please contact us through any of the following:

- Calling us toll-free at 1-855-550-0007 or
- Emailing us at CCPARequest@watermarkcommunities.com, or
- Visiting our CCPA reporting portal: <a href="https://www.lighthouse-services.com/watermarkcommunities/privacy">https://www.lighthouse-services.com/watermarkcommunities/privacy</a>, or
- Visiting our website at www.watermarkcommunities.com for more information

**Verification of Your Identity.** To protect your privacy, we will ask you to verify your identity. We will ask you to confirm your name, email address, phone number and other information so that we can

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reasonably confirm your identity. We will not share any information until we can reasonably confirm your identity.

# **Our Response Time to Your CCPA Request**

- Response Time. We will respond to your request within forty five (45) days from when you contacted us.
- Response Time for Complex Requests. If you have a complex request, the CCPA allows us up to ninety (90) days to respond. We will still contact you within forty five (45) days from when you contacted us to let you know we need more time to respond.

We provide more detailed information below about your specific rights under the CCPA.

## Part II - Detailed Explanation of Consumer Rights Under the CCPA

#### Right to Know About Personal Information Collected, Disclosed or Sold

- Your Right to Know. You have the right to know what personal information we collect, use, disclose, and/or sell.
- **Response Contents.** Our response will contain the following information from the previous twelve (12) months:
  - Categories of personal information we collected about you.
  - The specific pieces of personal information we collected.
  - The categories of the sources of the personal information.
  - Our business or commercial purpose for collecting your personal information.
  - Any third parties we shared your personal information with.
  - Whether or not we sold any of your personal information. If we sold any of your personal information, our response will tell you what information we sold, who we sold the information to, and why we sold the information.

## Right to Request Deletion of Personal Information

- Your Right to Deletion. You have the right to ask us to delete your personal information that we have collected and shared with our service providers.
- Information We May Keep. The CCPA allows us to keep your personal information that we need to provide you with goods and services, detect security risks, fix any errors, exercise free speech, use your information lawfully for our internal purposes, and to comply with the law.

# Right to Opt-Out of the Sale of Personal Information

 Your Right to Opt-Out. If we sell any of your personal information, you have the right, at any time, to tell us to stop.

# Right to Non-Discrimination for Exercising Your CCPA Rights

Our Non-Discrimination Policy. If you choose to exercise any of your CCPA rights, we will not
discriminate against you.

#### **Financial Incentives for Your Personal Information**

- Notice of Financial Incentives. The CCPA allows us to provide financial incentives for collecting, selling, or deleting your personal information.
  - At the time this Privacy Policy was last updated, we do not provide any financial incentives.

### **Asking Others to Exercise Your CCPA Rights**

- Authorized Agent. The CCPA allows you to ask someone else to exercise your CCPA rights for you. The CCPA calls this person your "Authorized Agent." Before we will share anything with your Authorized Agent, you will need to provide your written permission. Please contact us if you would like us to know who your Authorized Agent is.
- Verifying the Identity of Your Authorized Agent. Once we have your written permission, we will also ask your authorized agent to verify their identity with us directly.
- Protecting Your Privacy. We will not share any of your information unless we have both your written permission and have verified this identity of your Authorized Agent.