
DANIELS PRIVACY POLICY

Daniels Gateway Rental Communities, Daniels Home Management & Daniels Commercial Leasing

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General Overview

Policy Statement

Daniels Gateway Rental Communities (“Daniels Gateway”), Daniels Home Management (“DHM”) and Daniels Commercial Leasing (“DCL”) (collectively referred to as “Daniels” or the “Company”) values the Company’s relationships with individuals to whom the Company provides service. Daniels recognizes the importance of privacy in these relationships and seeks to properly manage all the personal information the Company collects, uses and discloses. This Privacy Policy (the “Policy”) details Daniels’ information management practices regarding personal information collected, used and disclosed in the course of its business.

Scope

The Policy applies to all personal information Daniels’ collects, uses and/or discloses in the course of conducting its business.

1. Daniels Gateway collects personal information in the course of its business of leasing residential units to individuals and in its role as the manager of residential properties.
2. DHM collects personal information in the course of its business as the manager of condominium corporations.
3. DCL collects personal information in the course of its business of leasing and managing commercial properties.

The Policy does not apply to personal information about Daniels’ employees that is collected, used or disclosed for the purposes of managing the employment relationship.

General Principles

The *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) defines “personal information” as information about an identifiable individual.

Personal information is broadly defined and includes, but is not limited to the following information that Daniels may collect and use:

Age	Cellular telephone number
Date of Birth	Employment history including letters of employment and paystubs
Social insurance number (optional)	Banking information
Home address/email address	Consumer Reports (including a credit report)
Home phone number	Credit Card/Debit Card information
Driver’s License Number/ other photo ID	Purchase and sale agreement/Mortgage Statement
Rental preferences	Information about income and assets
Information about previous landlords	Support for additional income (e.g., Child Tax Benefits, ODSP <i>etc.</i>)
Personal references	College/University enrollment letter
Emergency contact information	Work Visa/Permanent Resident Card

There are ten principles under PIPEDA that organizations must follow when dealing with personal information in the course of doing business. These ten principles are summarized below and Daniels' practices for complying with these principles are detailed in this Policy.

1. **Accountability:** Daniels is responsible for personal information under its control. As such, Daniels is required to appoint an individual (or individuals) to serve as a "Compliance Officer" to represent the Company and its accountability.
2. **Identifying Purposes:** Daniels must disclose the purpose for collecting personal information either at or before the time of collection and this purpose must be documented.
3. **Consent:** The knowledge and consent of the individual providing personal information is required before collection, use, or disclosure of this information, except where obtaining consent is inappropriate or not required by law. Daniels must not, as a condition of leasing a unit, require an individual to consent to the collection, use, or disclosure of personal information beyond that required to fulfil the transaction. Daniels considers the sensitivity of personal information when determining the form of consent (explicit or implicit) to be obtained. Subject to contractual restrictions associated with the leasing of a property, an individual may withdraw their consent at any time.
4. **Limiting Collection:** The collection of personal information by Daniels shall be limited to information deemed necessary for the purposes identified by Daniels at the time of collection. The type of personal information collected is described in this Policy and shall be collected by fair and lawful means.
5. **Limiting Use, Disclosure, and Retention:** Personal information collected by Daniels may only be used or disclosed for the purposes for which the information was collected except with consent or as required by law. Unless consent is not required under PIPEDA, deviation from the intended use must be consented to in advance, by the individual. If personal information is to be used for a new purpose, this new purpose must be documented. Personal information shall be retained only as long as necessary to fulfill the purpose for which it was collected. Daniels must have procedures in place for the retention and destruction of personal information that comply with the requirements of PIPEDA and any other applicable legislative requirements.
6. **Accuracy:** Personal information that is collected must be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
7. **Safeguards:** Personal information collected and stored by Daniels (in paper or electronic format) shall be protected by physical, organizational and/or technological safeguards appropriate to the level of sensitivity of the personal information. Staff shall be made aware of the importance of maintaining the confidentiality of personal information and care shall be taken in the disposal or destruction of personal information.
8. **Openness:** Upon request, Daniels will readily disclose this Policy and other information about its practices and procedures for handling personal information.
9. **Individual Access:** Subject to certain exceptions, upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. Daniels must respond to a request for access within a reasonable time and at minimal or no cost to the individual. An individual shall be able to challenge the accuracy and completeness of this information and have it amended as appropriate. When a challenge is not resolved to the satisfaction of the individual, Daniels shall record the substance of the unresolved challenge.
10. **Challenging Compliance:** Individuals have the right to question Daniels' compliance with the above principles. These challenges shall be directed to the appointed Compliance Officer (see "Daniels Compliance Officer"). Daniels must have procedures in place to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information.

What Personal Information Does Daniels Collect and How is it Used?

Daniels collects personal information in two principal contexts.

1. **Leasing:** Daniels leases residential and commercial units in buildings owned by subsidiaries of Daniels and in buildings owned by clients of Daniels for which Daniels is engaged to provide property management services. Daniels collects personal information to facilitate the leasing of these properties and the subsequent management of the lease including enforcing the terms of the lease and/or the collection of monies owed under the lease agreement.
2. **Property Management:** Daniels collects personal information for the purposes of managing a property/building.

Leasing

Daniels collects an applicant's name, email and telephone number when they contact Daniels about leasing a unit. This information is used to contact the applicant and book a tour of the property.

If the applicant chooses to proceed with an application to lease a residential property, they are required to complete a rental application and if the applicant chooses to proceed with an application to lease a commercial property, they are required to complete a letter of intent ("LOI"). In completing both of these documents an applicant is required to provide personal information necessary to process and make a determination about the application. The type of personal information collected in these documents is identified in the section of the Policy titled "General Principles".

In addition to the personal information collected on the rental application and LOI and as part of its process for determining whether the application will be approved, Daniels may collect and use the following information:

- personal information about the applicant from the applicant's previous landlords to obtain information about the applicant's compliance with previous lease agreements and the landlord's experience with the applicant more generally.
- personal information from an applicant's employer or previous employer, personal references, other agencies or in some circumstances, the Dow Jones Risk and Compliance online service, for the purpose of assessing and making a determination about the applicant's rental application.
- a credit history report through a consumer or credit reporting agency for the purpose of assessing the applicant's likelihood of complying with the financial obligations of any lease agreement. For a commercial lease, a credit history report may be required for the individual indemnifying the lease application on behalf of the applicant.
- bank or mortgage statements from an applicant for the purpose of assessing the applicant's ability to comply with the financial obligations of any lease agreement.
- other personal information to protect Daniels' business interests including but not limited to, the recovery of debts and enforcement lease agreements.

Once an application is approved, Daniels requires the applicant to enter into a residential tenancy agreement or a commercial lease agreement, whichever is applicable. These agreements include the collection of personal information necessary to establish the terms of and administer the lease.

Property Management

In its capacity as a property manager, Daniels may collect, use and/or disclose personal information about tenants and condominium unit owners necessary to provide service to the tenants, condominium unit owners, and condominium occupants, administer the lease agreements as required, and ensure the safety, security and operation of the building.

a) Video Surveillance

Buildings managed by Daniels operate video surveillance for the purpose of maintaining the security of the building and the building's tenants, condominium unit owners and occupants, and for the prevention of crime. Individuals are alerted to the presence of surveillance cameras at these buildings by signs posted at the entrance to the building.

Video surveillance captures interior and/or exterior common areas including but not necessarily limited to points of entry and exit of the building, the lobby of the building, the parking garages, common use outdoor terraces, lounges, corridors *etc.* There is no surveillance that could capture the inside of a private unit in a building.

The surveillance operates 24 hours per day, 7 days per week and is recorded but at some buildings the camera is only motion activated. Surveillance footage is retained for different periods of time depending on the equipment in operation at the building. At the end of the retention period the footage is automatically deleted.

While at some buildings the footage can be viewed in real-time by the building supervisor, it is not actively monitored and will only be accessed by Daniels in the event of an actual or suspected security incident or actual or suspected criminal activity.

A request for access to video surveillance footage will be addressed in accordance with Daniels' policy on "Requests to Access and/or Correct Personal Information" detailed below. Access to footage that contains personal information about the person making the request will generally be granted unless disclosure of the information is not permitted or required under PIPEDA and particularly, will not be granted where access would disclose personal information about a third-party that cannot be severed and the third-party has not consented to disclosure of the information.

b) Key Card Access Information

Some buildings managed by Daniels track and retain a record of the use of individual condo owner, tenant, or occupant key cards used to enter and exit the building and to access building amenities. This information is collected for the purpose of maintaining the security the building and the prevention of crime and may be accessed if there is an actual or suspected security incident or actual or suspected criminal activity.

The key card data is also used by Daniels to help plan future developments by for example, providing information about which building amenities are used most frequently.

Disclosure, Transfer and Sharing of Personal Information

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual (unless consent is not legally required in the circumstances) or as required by law. Circumstances under which Daniels may disclose personal information include the following:

- Personal contact information of individuals who apply to lease a unit from Daniels may be disclosed to the marketing department of The Daniels Corporation for the purpose of marketing its current and future projects. An individual may opt out of receiving marketing emails at any time by utilizing the opt-out function at the bottom of the marketing email from The Daniels Corporation.
- Where Daniels leases a unit that it owns but that is managed by a third-party management company, Daniels will disclose a copy of the Form 5-Summary of Lease document to the property management company. In certain circumstances, the property management company will require a complete copy of the lease agreement and in such cases, Daniels will disclose the full lease agreement.
- Personal information may be disclosed as necessary or appropriate to protect property, Daniels' business interests and to enforce contracts including lease agreements.
- Personal information may be disclosed in order to comply with laws or legal processes, including conducting an investigation which Daniels determines is required under appropriate circumstances
- Personal information may be shared with our affiliates, subsidiaries, divisions and service providers who provide services to Daniels or on Daniels' behalf and agree to only use such information for the purpose for which it was provided and in accordance with this Policy.
- Personal information may be shared with Daniels' legal or other professional advisors for the purpose of obtaining legal or professional advice.
- Personal Information may be disclosed without consent in accordance with PIPEDA, to credit bureaus and to third-parties collecting amounts owed to Daniels or to the owners of the properties that Daniels manages, including third-parties to whom Daniels assigns an individual's account for collection purposes.

Cooperation with Law Enforcement

Daniels may disclose personal information on its own initiative to a government institution, including a law enforcement agency, if Daniels has reasonable grounds to believe that the information relates to a contravention of the laws of Canada, a province or a foreign jurisdiction that has been, is being or is about to be committed or Daniels suspects the information is relevant to national security or the defence of Canada.

Daniels will also disclose personal information in response to lawful requests from law enforcement or other government institutions/agencies.

The tenant of a rental unit in a building managed by Daniels is responsible for informing their friends, family and/or other visitors of Daniels policy regarding cooperation with enforcement.

Consent

Daniels will obtain consent prior to the collection, use or disclosure of personal information unless such consent is not required by law. At or before the time the individual provides consent, Daniels will make reasonable efforts to ensure the individual is informed of the purpose(s) for which the individual's personal information is being collected, used and/or disclosed.

During the tenant application process Daniels seeks express consent to collect, use and disclose personal information necessary to process, assess and make a determination about the application.

Implied consent for the collection, use and/or disclosure of personal information may be inferred by Daniels when providing services and otherwise managing the lease and the building over the course of an individual's tenancy. However, in circumstances where the purpose for collecting, using or disclosing personal information is not obvious and/or the individual did not provide the information voluntarily for such purpose, Daniels will seek express consent of the individual unless it is not legally required to do so in the circumstances.

If personal information is to be used for a purpose different than that for which it was collected, Daniels will contact the tenant or prospective tenant to gain express consent to use the information for the new purpose unless not required to do so by law. Individuals have the right to withdraw consent at any time, except where doing so is contrary to legal or contractual restrictions. Where consent is withdrawn Daniels's will inform the individual of the consequences of such withdrawal.

Retention, Data Security & Destruction

After collection, Daniels retains personal information in two formats: original paper format and electronic format.

Daniels employs administrative, technical and physical safeguards intended to protect against the loss, misuse, unauthorized access, or disclosure of personal information. Although Daniels takes such precautions seriously, it is not possible for Daniels to guarantee the safety and security of personal information.

Personal information is retained only as long as necessary to fulfill the purpose for which it was collected. Personal information that has been used to make a decision about an individual shall be retained long enough to allow the individual access to the information after the decision has been made. Personal Information that is the subject of a request for access under the PIPEDA shall be retained as long as necessary to allow the individual time to exhaust all recourse under PIPEDA.

At the conclusion of the applicable retention period, paper and electronic files are securely destroyed such that personal information cannot be recovered or reconstructed..

Individual Access, Correction & Challenging Compliance

Requests to Access and/or Correct Personal Information

Upon request, Daniels will inform an individual of the existence of personal information the Company holds about the individual and the circumstances in which the individual's personal information was used and/or disclosed including the identity of any third parties to whom it was disclosed. Subject to limited exceptions as provided for under PIPEDA and upon request, Daniels will provide an individual with access to his/her personal information.

An individual may request that Daniels correct inaccurate or incomplete personal information by contacting the Compliance Officer. When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, where it is able to do so, Daniels shall make the necessary correction or if the information is located in records received from third parties, appropriately notify the third party of the existence of the inaccuracy.

All requests under this section of the Policy must be made in writing to the Compliance Officer and must be sufficiently detailed to enable Daniels to understand and respond to the request.

Daniels will respond to requests under this section of the Policy within thirty (30) business days or such shorter time as may be required by law. If Daniels is unable to respond within thirty (30) days it will provide a written notice of an extension of the timeline for responding.

Where a request made under this section of the Policy is refused in full or in part, Daniels will notify the individual in writing and will provide the reasons for refusal as well as any recourse that may be available to the individual. Where an individual's request to correct personal information is denied, Daniels will maintain a record of the request and denial.

Complaint Procedure

Complaints or concerns regarding Daniels' compliance with this Policy or with applicable privacy laws should be made in writing to the Compliance Officer.

Privacy complaints will be received at Daniels Head Office and will be directed to the Compliance Officer who will follow the process below:

- An acknowledgment will be sent to the complainant if contact information has been provided.
- The individual will be contacted (if necessary) to clarify the complaint.
- A Daniels employee with the relevant skills will be assigned to conduct a fair and impartial investigation of the complaint.
- The assigned investigator will receive access to all relevant records needed to conduct the investigation.
- The complainant will be notified of the outcome of the investigation clearly and promptly and will be informed of the relevant steps taken (if any).
- If a complaint is found to be justified, Daniels will take appropriate measures, including, if necessary, amending its policies and practices and correcting any inaccurate personal information.
- Employees will be made aware of any relevant changes to policies and practices.

Should the complainant be unsatisfied the manner in which their complaint is addressed, the individual may escalate the matter by contacting the Office of the Privacy Commissioner of Canada.

The Office of the Privacy Commissioner of Canada can be contacted by:

Online: https://www.priv.gc.ca/complaint-plainte/index_e.asp

Toll-Free: 1-800-282-1376

Daniels Compliance Officer

Daniels' Compliance Officer is responsible for compliance with PIPEDA including, implementing the Policy and other practices and procedures to protect personal information.

In addition, Daniels' Compliance Officer is responsible for:

- a) responding to complaints, requests for access to or correction of personal information and inquiries regarding the Policy and Daniels' privacy information management practices more generally;
- b) training staff and communicating to staff information about the Policy and Daniels' practices and procedures for protecting personal information; and
- c) amending the Policy as necessary to comply with changes to the law and developing/amending other information as necessary to explain Daniels' practices and procedures to protect personal information.

The Daniels' Compliance Officer is **Nicole Parro**.

All inquiries and complaints regarding the Policy or Daniels' practices and procedures for handling personal information may be directed to Nicole at:

Nicole Parro
2885 Argentia Road, Unit 1
Mississauga, ON L5N 8G6
Tel: (905) 593-1886
Email: nparro@danielscorp.com

Effective Date of Statement

This Statement has been adopted by Daniels as of May 7, 2021.