

# PRIVACY

**GWL Realty Advisors Inc. and its affiliates, GWL Realty Advisors Residential Inc. and The Canada Life Assurance Company (“GWLRA”)** are committed to protecting your personal information and respecting your privacy.

In order to provide you with services and products, we may collect, use and disclose your personal information. We know you are trusting us to keep your personal information secure and we take this responsibility very seriously.

Our Online Privacy Statement, Privacy Guidelines, Social Media Guideline, and Protecting your privacy outside Canada Statement describe our commitment to privacy and protecting your personal information.

- **Online Privacy Statement**

The Online Privacy Statement covers the use of personal information collected by GWLRA during your visits to GWLRA websites.

- **Privacy Guidelines**

The Privacy Guidelines describe our commitment to privacy and what guides us in protecting the privacy and confidentiality of personal information. It also explains how we collect, use and disclose personal information, and how you can contact us with questions or to exercise any of your rights to access or correct your personal information.

- **Social Media Guidelines**

The Social Media Guidelines describe how we may interact with you and treat your personal information on our social media channels.

- **Protecting your privacy outside Canada**

The Protecting your privacy outside Canada Statement describes why your personal information may leave Canada.

## Online Privacy Statement

We are committed to respecting your privacy. This Online Privacy Statement applies to GWL Realty Advisors Inc. and its affiliates, GWL Realty Advisors Residential Inc. and The Canada Life Assurance Company's (“GWLRA”) websites and mobile applications that link to this Online Privacy Statement (the “Online Services”) and explains how we collect, use and disclose your personal information when you use the Online Services.

GWLRA is committed to respecting the privacy and confidentiality of information it receives in accordance with GWLRA's Online Privacy Statement, and applicable law.

**Personal Information** is information about an identifiable individual.

### Your Consent

By using Online Services, you acknowledge that you have read and understand this Online Privacy Statement. This Statement may be changed without notice to you, so we recommend you review it regularly.

The statement supplements our Social Media Guideline, Privacy Guidelines and any other terms or agreements that may apply to your relationship with us.

## Privacy and Confidentiality

We have safeguards in place to protect the security and confidentiality of your personal information. However, the Internet is not a secure place where privacy and confidentiality can be guaranteed. Your confidential use of the Online Services can't be guaranteed, and you acknowledge that your use of the Online Services may be subject to access or manipulation by, or disclosure to, third parties. GWLRA is not responsible or liable for any damages that you or any other person may suffer in connection with any such violation of privacy, confidentiality or security.

## Personal Information Collected

Certain Online Services may require you to provide personal information to access the service. Such personal information includes, your name, signature, residential address, telephone numbers, e-mail address, date of birth, driver's license, vehicle information, place of employment, financial information, annual income, banking information, credit card information, credit history, emergency contact information, medical information, photograph, video footage and audio recording from security surveillance cameras, access card information, Online Services log-in credentials, resume, personal references, and is used to help provide you with a secure, private and convenient experience.

For Online Services requiring you to register, your personal information may be used for:

- **Identity verification:** This information is used to confirm your identity when registering for access to certain Online Services. The information is matched against our existing records to allow you to register.
- **Communication with GWLRA:** If you send GWLRA an email through our "Contact Us" feature, we'll use the email address you provide at registration to contact you with our reply. If your email address changes, you can always change the email address we have on record on either the "Contact Us" page, or in the "Your Profile" section of the website or mobile application, if applicable.
- **Forgotten User Name or Password:** If you forget either your user name or password, it is simple to recover them online by going through our Forgotten User Name or Password services, available from the Sign In page. To confirm your identity before showing either of these items, we match what you enter against the information collected during your registration.
- **Marketing.** With your consent, we may use your personal information to send you information about GWLRA and its affiliates, including information about products, services, offers and events

## E-mail security

The security of e-mail communication cannot be guaranteed. Do not send private or confidential information to GWLRA via e-mail (e.g., your Social Insurance Number, credit card information, banking information). Any person wishing to communicate or send information of a private or confidential nature to GWLRA or a third party is encouraged to do so by other means.

## **Cookies**

“Cookies” are small items of data that websites store in your browser. These data files contain information the website can use to track and organize the pages you have visited, and to gather information. Some of our web-based applications use “cookie” technology to measure website activity and tailor information to fit your personal interests. GWLRA uses both “session” and “persistent” cookies, both of which help us deliver a superior website experience that is designed to be fast, secure and personalized. You may decline cookies by configuring your web browser accordingly, but this may lead to reduced website functionality.

### **The type of data being collected**

We gather data when you interact with our websites and apps. The data we collect includes your IP address, information about how visitors explore our websites and about the number of new and repeat visitors, the pages they visited on our website, the date and time of their visits, the length of the visits, the referral URL, and information about the device and browser used and other similar details.

We also offer location-enabled services within some of our mobile applications, such as Google Maps. If you use mobile applications, they may receive information about your actual location or information that can be used to approximate your location. You are always notified by the Geolocation Service, which you have the option to refuse.

GWLRA or agents on our behalf collect this information through the use of cookies.

### **With whom the data is shared**

We use web analytics tools on our website and mobile applications (Google Analytics and Adobe Analytics). Advertising tools are provided to us by advertising partners (like Google, Facebook, LinkedIn and Twitter) and the advertising pixel tags on our website are deployed through Adobe Tag Manager.

We share the website information gathered using cookies with these partners or other agents to analyze online activity on our website or mobile applications or in reaction to online advertisements.

The information collected by these online tracking tools maybe combined with your personal information if you have entered your access ID and password or provided it to us through your persistent cookie.

### **How to opt out of targeted advertising**

You can choose not to allow your information to be used for targeted advertising by turning off personalized ads in the settings of Facebook, LinkedIn, or Twitter, turning off cookies, opting out of ads (Canadian users can also opt out of targeted advertising through the [Digital Advertising Alliance of Canada’s website](#), “going incognito” or engaging private browsing on your web browser.

### **How to Block Cookies**

You can change your browser settings to block cookies from being stored on your computer or mobile device. The ‘help’ menu of your browser should provide information on how to manage your cookie settings.

To block cookies when using the browsers on your mobile device, refer to the procedure for turning cookies on or off in the Chrome and Safari apps. Please be aware, however, that blocking cookies may prevent some pages on our website or some parts of our application from displaying correctly, and some features may not be available.

## Links to other Websites

Some of our Online Services contain links to other websites that are not maintained or controlled in any way by GWLRA. We don't control and are not responsible for any of these websites or their content, and as a result such links are not to be viewed as an endorsement by GWLRA or any other party of the products, services, advice or opinions or any other content of such websites. Links to such sites that aren't maintained or controlled by GWLRA are provided for convenience only.

## Privacy Guidelines

GWL Realty Advisors Inc. and its affiliates, GWL Realty Advisors Residential Inc. and The Canada Life Assurance Company ("GWLRA") follow the key privacy principles below when collecting, using, or disclosing your personal information.

### Accountability

At GWLRA, we are responsible for all personal information under our control. This includes any personal information that is disclosed to a service provider performing services for, or on behalf of GWLRA.

GWLRA, its directors, officers, employees, licensed representatives, and other persons and organizations who act for, or on behalf of, GWLRA are responsible for the protection of your personal information.

Access to personal information is restricted to directors, officers, employees, licensed representatives, and other persons or organizations acting for, or on behalf of, GWLRA, and employees of the landlords of the properties that GWLRA manages who need the information in order to provide services to the prospective tenants and residents, tenants and residents, or GWLRA.

Business Unit Compliance Contact, GWLRA, monitors compliance with these Privacy Guidelines.

We require our service providers to protect your personal information appropriately in a way that is consistent with our Privacy Guidelines and in accordance with applicable laws.

We require our service providers to only collect, use or disclose your personal information in accordance with the authorized purpose.

Personal information may be subject to disclosure to law enforcement officials and other authorities where required by law, both inside and outside of Canada.

### Identifying Purposes

We identify the purposes for collecting personal information before, or at the time the information is collected.

Personal information that we collect may be used to:

- Provide you with GWLRA services and products
- Process your application for tenancy, your lease, other tenancy interactions
- Process your payment, i.e. deposit, rental payment
- Decide your eligibility for tenancy with GWLRA for which you apply
- Make reference calls or request verification of your employment, history with prior landlords
- Respond to your questions, comments, inquiries or request for information regarding GWLRA services
- Send you communications which you have opted-in to receive

- Administer your tenancy
- Accommodate special needs, e.g. during emergency evacuation
- Enforce rental agreement, parking agreement, lease and any other types of client agreements as applicable
- Create, maintain or administer Profile log-in account, if applicable
- Tailor your experience on the Online Services
- Help diagnose technical problems with the Online Services
- Administer the Online Services
- Perform internal data management and analytics by GWLRA
- Meet legal or regulatory requirements
- Video surveillance, access cards and other information for general security purposes including prevention of potentially prohibited or illegal activities
- Emergency or incident reporting including video, other surveillance for investigation, insurance and other risk management
- Employment purposes, including using resumes, and personal references provided in applications of employment and employment forms
- Perform statistical analysis
- Enforce website terms of use
- Communicate with you and administer your participation in surveys, events, programs, and promotions
- Protect our interests in a civil proceeding or a proceeding involving criminal activity, fraud, or misrepresentation
- Provide information related to a purchase, sale, reorganization, or financing of all or part of our business or operations, including for due diligence purposes in connection with any such proposed transactions

We may collect your Social Insurance Number (SIN) where required by law for tax-reporting purposes.

In addition, where you provide consent, we may also use your SIN for identification and record-keeping, such as keeping your information separate from other customers and people with similar names. Where you have consented to use of SIN for identification and record-keeping purposes, you can withdraw this consent at any time.

### **Consent**

We collect, use and disclose your personal information with your consent, or as permitted or required by law.

We may collect your consent in different ways. It may be expressed in writing or be implied, provided to us verbally, electronically, or through an authorized representative.

Subject to legal or contractual restrictions, your consent can be withdrawn at anytime; however, withdrawing your consent may impact our ability to continue to provide you with the services you requested.

Where previously provided, you may withdraw your consent to use your SIN for identification and record keeping purposes.

## **Limiting Collection**

We only collect personal information that is necessary for the purposes identified.

Personal information we collect about you may include:

- Identification information, such as name, residential address, telephone numbers, e-mail address, date of birth, driver's license, vehicle information, or other identifying information;
- Financial information, such as place of employment, annual income, banking information; credit card information, credit history;
- Emergency contact information, such as name, address, telephone number;
- Health or lifestyle information, such as job, travel history or plans, driving record, or criminal record;
- Medical information, such as mobility requirements, medical history; or
- Information that we collect through security systems such as video surveillance tools and access cards.

The personal information we collect is obtained from applications and other forms collected directly from you or through your authorized representative. We may also collect your personal information from credit agencies, employers or personal references, or other third parties who represent that they have the right to disclose the information. In addition, when you visit our Online Services, we may obtain certain information by automated means. We gather data when you interact with our websites and apps as indicated in our Online Privacy Statement.

## **Use, Disclosure and Retention**

We will keep personal information only as long as necessary to fulfill the identified purpose and in accordance with our policies and applicable laws.

We may share your personal information with other companies or individuals to assess applications and service your tenancy but only for the purposes disclosed at the time of collection or for a use consistent with that purpose. We may share your information, including personal information with:

- Credit reporting agencies for the purposes of assessing your application for tenancy;
- Financial institutions for the purposes of processing your deposit or rental payment;
- Law enforcement agencies or governmental agencies as required or permitted by law;
- Our subsidiaries and affiliates to fulfill their roles as service providers and/or property owners;
- Owner of a GWLRA managed property and/or Landlord for the purposes of managing your tenancy, and providing statistical analysis and reporting;
- Vendors or suppliers of utility, cable, satellite and other services and products to provide their services or sell their products to tenants and residents of our buildings with your consent;
- Prospective lenders, purchasers and their agents, provided that purchasers have entered into a confidentiality agreement;
- Other third parties with your consent;
- Our service providers which may be located outside of Canada. In those cases, your personal information will be subject to the laws that apply in those countries, including public authorities access laws.

We may disclose your personal information in order to protect our interests in a civil proceeding or a proceeding involving criminal activity, fraud, or misrepresentation.

We may also disclose your information, including personal information, in the event we sell or transfer all or a portion of our business or assets (including corporate reorganization, merger or amalgamation with another entity, dissolution or liquidation).

We may also disclose your personal information for additional purposes that may be identified at or before the time that the information is collected or disclosed or for new purposes to which you have consented.

GWLRA uses video surveillance to deter crime and protect the safety and security of our tenants, residents and employees. When a crime has occurred, we use and share the video with police to assist police in the ensuing investigation.

Security cameras are placed exclusively in common areas of the property. The recorded images are stored in a secure location at the property which is only accessed by authorized GWLRA employees. The recorded images are kept for up to 180 days before being destroyed.

Any questions regarding video surveillance should be directed to the Business Unit Compliance Contact, GWLRA whose contact information is listed below:

Business Unit Compliance Contact  
GWL Realty Advisors Inc.  
33 Yonge Street, Suite 1000,  
Toronto, ON, M5E 1G4  
[GWLRACompliance@gwlra.com](mailto:GWLRACompliance@gwlra.com)

### **Accuracy**

We recognize the importance of ensuring that your personal information is accurate and up to date.

We rely on you to provide us accurate information and to contact us about any changes to your personal information. You have the right to ask us to change or correct information we have collected about you. Where your personal information is inaccurate or incomplete, we will make any necessary changes.

### **Safeguards**

We take the protection of your personal information seriously. We use appropriate physical, technical and organizational safeguards to protect your personal information against loss and unauthorized access, use, or disclosure.

All of our employees receive annual information security, privacy, and Code of Conduct training.

We have security standards to protect our systems against unauthorized access and use. Our service providers are required to protect their systems against unauthorized access and apply security standards that are, at a minimum, equivalent to ours. Our service providers are also contractually required to protect and only use your personal information for the purposes authorized by GWLRA.

## **Openness**

This Privacy Guideline, as well as other policies and procedures, are always available to you. Please contact us if you are unable to access our website or require documents in another format.

Upon written request, we will respond to inquiries about our practices relating to the management of personal information. You can contact Business Unit Compliance Contact, GWLRA with any inquiries or complaints.

## **Individual Access**

Upon written request, we will provide you with details regarding your personal information including what information we have about you, and how it has been used and disclosed, subject to certain exceptions permitted by law. You may also request that we correct your personal information. Where we find that the personal information is indeed incorrect, we will update it.

To protect your personal information, all requests for access must be made to us in writing.

Any concern, inquiry or request related to privacy, should be made in writing to Business Unit Compliance Contact, GWLRA using the below contact information:

Business Unit Compliance Contact

GWL Realty Advisors Inc.

33 Yonge Street, Suite 1000,

Toronto, ON, M5E 1G4

[GWLRACompliance@gwlr.com](mailto:GWLRACompliance@gwlr.com)

## **Social Media Guideline**

GWL Realty Advisors Inc. and its affiliates, GWL Realty Advisors Residential Inc. and The Canada Life Assurance Company ("GWLRA") are active online with social media and invite you to share your comments and thoughts through our platforms.

At GWLRA, we are committed to respecting your privacy. The providers of social media platforms used by GWLRA are not affiliated with our organization. As such, we recommend that you use care when sharing personal information on these platforms. Personal information you share with us in private messages over our social media platforms may be shared with our employees, representatives and third-party service providers. These third-party service providers may be responsible for handling our social media accounts, including responding to any of the questions or issues you raised. As these individuals and service providers may in some cases be located outside of Canada, the personal information you share could be subject to access under the laws of such foreign jurisdictions.

Content that you post on our public social media platforms is not private and may be seen by anyone who visits our platform. When you share information in public comments or posts, you acknowledge and agree that it is not confidential. No personal information should be posted on our social media platforms. GWLRA also discourages sending personal information through private messages to our social media.

GWLRA reserves the right to remove or cause to be removed posts or comments that constitute or include:

- Sensitive personal information about you or someone else
- Personal attacks, or defamatory, abusive, or hateful comments
- Links to any content containing a virus
- Spam, advertising, soliciting or links to external sites not previously approved by GWLRA
- Content that, to our knowledge, violates the intellectual property rights of another
- Language or topics that may offend other members of the community including content (including photos) that is discriminatory, offensive, crude, harassing, abusive, defamatory or threatening, or that contains profanity (even in short or abbreviated form) or discussion of illegal activities
- GWLRA reserves the right to add to, remove, or change any of the terms of this Social Media Guideline at any time

**Confidentiality and privacy are important.** If you are a GWLRA client, or a tenant, resident or visitor in our buildings, and have specific questions about your account, lease, tenancy, or about the services we provide, to protect your privacy, we cannot answer them on social media. We'll ask that you send your information to us by email or another means so we can direct your question to the appropriate GWLRA representative so they can communicate with you directly.

If you are you a GWLRA employee, or contracted by or associated with GWLRA, when participating on social media, please be open about your employment or association with GWLRA and be clear that you're expressing your own views and not the views of GWLRA.

We do not endorse, nor are we responsible for the accuracy of the information, opinions, claims or advice shared by other social media users. Please use your own careful judgment when relying on the information or advice contained in these postings.

GWLRA is not affiliated with Twitter, LinkedIn, Instagram, and we're not responsible for the terms of use or their privacy or security policies, or advertisements or other material placed by Twitter, LinkedIn, Instagram on our social media pages. We don't endorse these advertisements or materials or any of the content, products, advice, opinions, recommendation, or other materials presented by Twitter, LinkedIn, Instagram, or other third parties through the site.

If you have questions or concerns about GWLRA services or products, you can find our contact information on our website: <https://www.gwlrealtyadvisors.com/contact-us/>

For more information about GWLRA's Privacy Practices, please visit our Privacy Guidelines and Online Privacy Statement or write to us using the below contact information:

Business Unit Compliance Contact

GWL Realty Advisors Inc.  
33 Yonge Street, Suite 1000,  
Toronto, ON, M5E 1G4  
[GWLRACompliance@gwlr.com](mailto:GWLRACompliance@gwlr.com)

## Protecting your privacy outside of Canada

### Service providers inside and outside of Canada

GWLRA is a Canadian company and as such, most of our business activities take place within Canada. However, in order to give a high level of cost-effective service to our customers, we may ask service providers to assist us. We take great care in the selection of service providers because of our commitment to a consistent high level of service and quality.

Some service providers may be based outside of Canada, or use systems, data support or employees located outside of Canada including in the United States or India.

Service providers that we may use include:

- Smart building technology service providers
- Property technology service providers
- Property and asset management software providers
- Tenant and resident services providers
- Property operations services providers
- Financial operations services providers

In day-to-day business, personal information about you may be collected from outside of Canada, or communicated outside of Canada, so that we or our authorized service providers can:

- Administer your application or tenancy
- Provide you with various services related to your tenancy with us (e.g. enhanced customer experience, building operations)
- Communicate with you regarding your questions or inquiries about our services

### The protection of personal information by service providers

We require that our service providers protect your personal information properly in a manner consistent with our Privacy Guidelines and in accordance with law in their jurisdiction.

We require that service providers collect, use or share your personal information only for purposes that we have authorized.

Personal information may always be shared with law enforcement and other authorities where permitted or required by law, both inside and outside of Canada.

Any concern, question or request related to the collection and communication of personal information outside of Canada should be made in writing. For more information, contact the Business Unit Compliance Contact, GWLRA, using the below contact information:

Business Unit Compliance Contact

GWL Realty Advisors Inc.

33 Yonge Street, Suite 1000,

Toronto, ON, M5E 1G4

[GWLRACompliance@gwlra.com](mailto:GWLRACompliance@gwlra.com)