

COLUMBIA PROPERTY MANAGEMENT LTD. PRIVACY POLICY

We collect your personal information in accordance with British Columbia's *Personal Information Protection Act* ("PIPA").

This Privacy Policy, in compliance with PIPA, sets out more detailed principles and practices that we follow in protecting your personal information.

1. Collecting Personal Information

1.1 "Personal Information" means information about an identifiable individual.

Personal information does not include contact information. "Contact information" means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

1.2 Unless the purposes for collecting personal information is obvious and you voluntarily provide your personal information for those purposes, we will communicate the purposes for which your personal information is being collected, either orally or in writing, before or at the time of collection.

1.3 We will only collect your personal information that is necessary to fulfill the following purposes:

- To understand your property management needs and your needs for our property management services
- To enable us to offer and provide you services
- To properly and fully respond to your inquiries
- To verify your identity
- To verify your creditworthiness if applicable
- To identify your preferences regarding the property management services we provide
- To meet regulatory requirements of the laws of British Columbia applicable to your occupancy of a strata unit or to our provision of property management services to you
- To assess your suitability for tenancy if applicable
- To collect and process payments
- To take measures to enforce your obligations under a lease agreement or the bylaws and rules of a strata
- To contact you in case of emergencies
- To fulfill our contractual requirements to your organization if applicable

2. Consent

2.1 We will obtain your consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

2.2 Consent can be provided orally or in writing or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and you voluntarily provide us with personal information for that purpose.

2.3 Express consent will be obtained for collecting sensitive information where the collection, use, or disclosure would not be reasonably expected, or where there could be a meaningful risk of significant harm arising from the collection, use, or disclosure of the information.

2.4 Subject to certain exceptions, such as when your personal information is necessary to provide the service or product, or when the withdrawal of consent would frustrate the performance of a legal obligation, you can withhold or withdraw your consent for us to use your personal information in certain ways. Your decision to withhold or withdraw your consent to certain uses of personal information may restrict our ability to provide you with a particular service or product.

2.5 We may collect, use or disclose personal information without your knowledge or consent in the following circumstances:

- The collection, use or disclosure is clearly in your interest and your consent cannot be obtained in a timely way
- When the collection, use or disclosure of personal information is permitted or required by law
- In an emergency that threatens an individual's life, health, or personal security
- When the personal information is available from a public source (e.g., a telephone directory)
- When we require legal advice from a lawyer
- For the purposes of collecting a debt
- To protect ourselves from fraud
- As otherwise authorized by PIPA

3. Using and Disclosing Personal Information

3.1 We will only use or disclose your personal information where necessary to fulfill the purposes identified at the time of collection.

3.2 We will not use or disclose your personal information for any additional purpose unless we obtain your consent to do so.

3.3 We will not sell your personal information to other parties.

4. Retaining Personal Information

4.1 If we use your personal information to make a decision that directly affects you, we will retain that personal information for at least one year so that you have a reasonable opportunity to request access to it.

5. Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that your personal information is accurate and complete where it may be used to make a decision about you or disclosed to another organization.

5.2 You may request a correction to your personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note your correction request in the file and the reasons why the correction was not made.

6. Securing Personal Information

- 6.1 We are committed to ensuring the security of your personal information in order to protect it from unauthorized access, collection, use, and disclosure.
- 6.2 The following security measures will be followed to ensure that personal information is appropriately protected:
 - The use of locking filing cabinets
 - Protecting keys and access devices by keeping them in a separate locked room
 - The use of user ID's and passwords and 2 factor identification where appropriate and possible
- 6.3 We will use appropriate security measures when destroying your personal information such as using a professional shredding service.

7. Providing You Access to Personal Information

- 7.1 You have a right to access your personal information, subject to exceptions that are set out in PIPA.
- 7.2 A request to access your personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell you how we use your personal information and to whom it has been disclosed, if applicable and permitted by PIPA.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 An administrative fee may be charged for providing access to your personal information. A deposit of up to the amount of the fee may be required before we provide the requested information. Where a fee applies, we will inform you of the cost, whether a deposit is required, and request further direction from you on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify you in writing, providing the reasons for refusal and the recourse available to you.

8. Questions and Complaints

- 8.1 Our Privacy Officer can be contacted at:

100 – 388 1ST Avenue
Kamloops, BC V2C 6W3

The Office of the Information and Privacy Commissioner of BC can be contacted at:

Mailing address

Office of the Information and Privacy Commissioner for British Columbia
PO Box 9038 Stn. Prov. Govt.
Victoria, BC V8W 9A4

Location

4th Floor, 947 Fort Street, Victoria, BC V8V 3K3

Telephone

1 – 250 – 387 - 5629