

**Privacy Policy for the Collection, Use, Disclosure
and Security of Personal Information**

Peel Condominium Corporation No. 447

Privacy of personal information about the unit owners, tenants and residents is a fundamental principle of our condominium corporation and its Board of Directors. We understand an individual's right to privacy and we are committed to collecting, using, disclosing and securing your personal information responsibly and for no other purposes beyond the need to efficiently and effectively provide services to residents and comply with the statutory obligations of the Condominium Act and other Federal, Provincial and Municipal requirements.

Peel Condominium Corporation No. 447 has adopted the following Privacy Policy to meet this commitment.

Introduction

Peel Condominium Corporation No. 447 and its Board of Directors (hereinafter called 'the Corporation') was created pursuant to the Condominium Act for the purpose of administering and managing the lands known as Granite Gates and providing services to its residents. In the course of its activities, the Corporation collects certain personal information from unit owners, tenants and employees (hereinafter called 'Individuals') and may employ or contract third party services from a variety of individuals, companies and professionals who may need access to this personal information.

'Personal Information' means information that is personally identifiable to Individuals. This may include, without limitation, telephone number, e-mail address, bank account number, payment histories, information about his or her family, seasonal address, emergency contact names and any special needs.

This Privacy Policy is based on, and complies with, Canada's Personal Information Protection and Electronic Documents Act ('PIPEDA'), which includes the Ten Privacy Principles outlined in the National Standard of Canada entitled *Model Code for the Protection of Personal Information* and similar provincial legislation.

This Privacy Policy sets out the ten principles that the Corporation follows to ensure that it protects Individual's personal information when it collects, uses or discloses it in the course of carrying on its activities. These correspond to similar principles contained in PIPEDA. All of our employees and our Managing Agent, Brookfield Residential Services Ltd. (hereinafter called 'Brookfield') who have access to personal information must adhere to this Policy and related procedures.

Accountability

The Corporation is accountable for all personal information in its possession or custody, including personal information disclosed to third parties for purposes of providing services requested by our residents or others. To this end, the Corporation has appointed a Privacy Officer who has ultimate responsibility for ensuring compliance within the Corporation.

The Corporation will ensure that Brookfield strictly complies with the Policy and will seek to include in contractual arrangements with suppliers provisions requiring them to provide a high level of protection for information transferred to them by the Corporation or by Brookfield.

Identifying Purposes

The Corporation will identify the purposes for which it is collecting any personal information by such means as is appropriate in the circumstances. This may include providing disclosure orally, by telephone, or in person, providing disclosure in a contract or in other written information given to an Individual or any other means deemed appropriate in the circumstances.

In some instances, where the purpose for collecting information is reasonably evident to the person providing the information, the purpose will be implied but not explicitly stated.

Consent

The Corporation will seek to obtain consent from an Individual before or when it collects, uses or discloses personal information except as described below. The Corporation will strive to ensure that Individuals understand how their personal information will be used or disclosed.

Consent can be given orally, electronically, in writing or implied or given through an authorized representative. Consent may be implicit when the purposes are not stated expressly but are implied by the circumstances of the transaction or follow logically from other expressly stated purposes. You can withdraw consent at any time, with certain exceptions (for example, subject to any legal or contractual restrictions) and upon reasonable notice to the Corporation. Note that information may be retained by the Corporation for audit or archival purposes notwithstanding any withdrawal of consent otherwise applicable but the fact that consent has been withdrawn will be noted so as to prevent an unauthorized use.

The Corporation, however, may collect, use or disclose personal information without the an Individual's knowledge or consent in exceptional circumstances where such collection, use or disclosure is permitted or required by law.

Limiting Collection

The Corporation will only collect information that is reasonably necessary for the purposes identified. Information will be collected by fair and lawful means.

Limiting Use, Disclosure and Retention

Personal information will only be used or disclosed for the purpose for which it was collected unless an Individual has otherwise consented, or when it is required or permitted by law. Personal information may only be retained for the amount of time needed to fulfill the purpose for which it was collected. In certain exceptional circumstances, the Corporation may have a legal duty or right to disclose personal information without an Individual's knowledge or consent with respect to matters that concern the public's interest.

Accuracy

The Corporation will keep or cause to be kept personal information as accurately, completely and current as necessary to fulfill the identified purposes for which it was collected. The Corporation will update or correct any personal information held by it if the individual concerned provides the Corporation with particulars, satisfactory to it, of any required updating or correction.

Safeguarding Personal Information

Personal information is safeguarded to protect against loss, theft or unauthorized access, disclosure, use or modification of information using measures appropriate to the sensitivity, amount, format, nature and storage of the information and will involve, as applicable, physical, organizational and electronic security measures.

Openness

The Corporation will make information available to Individuals and others about the policies and procedures it uses to manage personal information.

Individual Access

As an Individual, you have the right to access the personal information we keep in your file and you have the right to verify or amend the information if it is shown to be inaccurate.

If you would like to view the personal information held in your file, please make a written request to the Corporation's Privacy Officer. The Corporation will respond to your request as efficiently as possible and will advise of the individual cost, if any, prior to the retrieval of such records. The Corporation will not respond to frivolous or vexatious requests for access to information. If the Corporation is prohibited from providing such access it will explain the reasons, except where prohibited by law. To make a change to your personal information (as discussed under 'Accuracy' above), please make a similar request in writing to the Privacy Officer.

Questions or Concerns

The Corporation has policies and procedures to receive, investigate and respond to any questions or concerns respecting this Privacy Policy or the personal information that we hold. Individuals may contact the Corporation's Privacy Officer with any questions or concerns or to request access to their personal information.

Specific Information about our Use and Disclosure of Your Personal Information

The Kind of Information We Collect:

The Corporation and Brookfield gather and use personal information as described below. Providing us with your personal information is your choice; however, we may not be able to provide you with certain products or services if you do not provide us with certain information nor will we be able to fulfil contractual obligations to third parties. For example, we may not be able to contact you in an emergency at your place of residence if we do not have your contact information away from your residence or if you withdraw your consent to disclose your contact information to us, Brookfield, their employees or contractors who provide some of the products or services you have requested.

Information that is typically required to provide you with services includes, but is not limited to:

- Name
- Address
- Phone Number(s)
- E-mail Address
- Name of Mortgagee on the unit
- Bank Account Number
- Persons Residing with you
- Address of Seasonal Property
- Other Phone Number
- Name of Emergency Contact and Contact Information
- Vehicle Information Including License Plate Number
- Any Special Needs of Owners

In addition, information other than as set out in the definition of personal information (above), may also be collected from time to time. For example:

- Video surveillance cameras are located in strategic locations throughout the building for security purposes and to record pedestrian and vehicular access to and within the property;
- Registration of visitors, including name, time of entry, license plate number and unit being visited;
- Computerized registration of the use of access cards or fobs recording access point, time of use and registered user of access device;
- Listing of residents who would require special assistance during a fire emergency; and
- Other similar lists related to security, pre-authorized access to the building by relatives, guests or service individuals.

When Do We Disclose or Share Your Personal Information?

(i) To The Corporation's Managing Agent, its Employees and our Employees and Contractors

As a Condominium Corporation, we periodically share or transfer any personal information we collect or cause to be collected relevant to a particular Individual with Brookfield, with Brookfield's employees and our third party suppliers or contractors. Our Corporation uses a number of employees, third party service providers, consultants and other agents that may in the course of their duties have limited access to personal information we retain. These include building superintendents, maintenance staff, recreation centre attendants, concierge, security staff, housekeeping staff, consultants, temporary employees or employees of third party suppliers, auditors, lawyers and others. We restrict their access to any personal information we hold except to the extent necessary for them to reasonably perform their role on your behalf. The purpose of disclosing personal information to these parties is to ensure an Individual's safety, security and reasonable enjoyment of their place of residence, to ensure Individuals have access to their premises and services that the Corporation provides, to preserve our property and to collect monies owing to us for the provision of services to Individuals.

Suppliers and Brookfield are bound to protect the confidentiality of your personal information, and they are prohibited from doing anything with this information that we have not authorized them to do. They are required to treat your personal information in a manner consistent with the Corporation's Privacy Policy

When Required or Permitted By Law

In some cases, such as under a court order, we may be required to disclose certain information to persons specified in the court order. We will only provide the specific information requested and only upon being satisfied that the authorities have legitimate grounds to obtain the information. The Corporation may also disclose information without your consent when permitted by law including in situations involving medical emergencies, collection of a debt and suspicion of illegal activities.

Contact Information (Questions, Concerns and Complaints)

If you have any questions or concerns about your personal information, or about the Corporation's Privacy Policy, please contact our Privacy Officer using the contact information below:

Contact Information: Bruni Fulton, Privacy Officer, 1800 The Collegeway, Management Office, Mississauga, Ontario L5L 5S4. 905-569-7326 or pcc447@rogers.com