

Privacy Policy (External)

What is the purpose of this Policy?

Primaris Management Inc (“Primaris”, “we”, “us” and “our”) is committed to protecting the privacy and confidentiality of personal information in our custody and control. To meet your needs and serve you well, Primaris may collect, use and disclose your personal information, the details of which can differ depending on the type of services you require. This Privacy Policy explains how we collect, use, disclose and protect personal information in our custody and control, including through our website at <https://www.primarisreit.com> (the “Website”).

What is “personal information”?

Canadian privacy laws define "personal information" broadly as information about an identifiable individual or information that allows an individual to be identified alone or in combination with other information.

What personal information do we collect about you?

If you contact us, access or use our Website(s) or free wi-fi at our centres, apply for a lease, or enter into a lease with us we may collect personal information about you including:

- name,
- address,
- telephone number,
- email Address,
- IP Address or geolocation,
- birth date, income, license plate number and credit history among others
- information about any complaints, enquiries, and communication you make with us,
- details on subscribed services received from us.

Collecting, using and disclosing your personal information. Why do we do it?

In general, we collect, use and disclose your personal information for one reason: to serve you better. Knowing you better helps us understand your needs, communicate effectively with you, and provide you with the services you want. More specifically, we may collect, use and disclose your personal information in order to fulfill the following purposes (the "Identified Purposes"):

- establish and manage landlord/tenant relationships;
- determine your eligibility to lease premises managed by Primaris, (including evaluating credit standing and matching credit reporting agency information), and for products and services that may be of interest to you from organizations with whom we have strategic alliances, and to offer these products and services to you;

- establish and maintain commercial relationships (including determining rental rates, administering accounts and to fulfill contractual obligations);
- hold contests, sweepstakes, conduct surveys about our service standards and receive comments and suggestions;
- make monthly parking arrangements;
- investigate and settle claims;
- compile statistics, conduct market research and report to owners of the buildings we manage;
- engage in business transactions (including purchase, sale, lease, merger or other acquisition, disposition or financing);
- investigate specific transactions or patterns of transactions to detect unauthorized or illegal activities;
- internal research and development.
- internal audits as permitted by and to comply with any legal or regulatory requirements or provisions; or
- for any other purpose for which you consent.

How do we collect your personal information?

In general, the collection, use and disclosure of your personal information depends on how you do business with us. More specifically, we may collect personal information about you from the following sources:

- from you, on letters of intent or offers to lease, requests for parking or on other forms filled out through telephone, e-mail, Internet or face-to-face interviews; for example, your name, address, telephone number, e-mail address, occupation and financial and banking information;
- from brokers, intermediaries and representatives with whom you have a relationship;
- from your interactions with us; for example, through your payment history;
- from consumer reporting agencies; for example, your credit history;
- from your browsing history on our website, through the use of cookies (see our Cookie policy here):

<https://www.primarisreit.com/pages/primarisreit-primaris-cookie-policy>

How do we disclose your personal information

We may transfer (or otherwise make available) personal information to service providers who provide certain services on our behalf. For example, we may use service providers to host the Website, store data, provide back-up services (including cloud-based service providers) and manage our communications. Some of our service providers may be located outside of Canada, including in the United States. While outside of Canada, personal information will be subject to applicable foreign laws, which may permit government and national security agencies to access your information in certain circumstances. Our service providers are

given access to the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own marketing or other purposes. For more information, please contact us as set out in the “How to contact us” section below.

We may transfer personal information as an asset in connection with a prospective or completed merger, acquisition or sale (including transfers made as part of insolvency or bankruptcy proceeding) involving all or part of Primaris or as part of a corporate reorganization or other change in corporate control.

Primaris may disclose your personal information where permitted or required by law, including to comply with a subpoena, warrant or other legally valid inquiry or order (which may include lawful access by Canadian or foreign governmental authorities, courts or law enforcement agencies), to other organizations in the case of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, to protect our rights and the safety and security of our employees, to enforce our agreements and collect debts owed to us, or as otherwise required or permitted by applicable law.

Does Primaris use video surveillance?

Video surveillance may be used for the purposes relating to safety of individuals, deterrence of theft or destructive acts, and security of Primaris’ buildings and property including, without limitation, investigation of a criminal act or security incident. In furtherance of these purposes, video surveillance may be used to monitor exterior and interior areas of Primaris’ property where there is no reasonable expectation of privacy. The video surveillance will be conducted in accordance with the laws of Canada.

The recordings collected through video surveillance are used:

- (a) to investigate any incident involving the safety or security of any individuals in or on Primaris’ buildings and property, including its employees, tenants, patrons, and / or contractors;
- (b) to provide evidence as required to protect Primaris’ legal rights; and
- (c) to provide law enforcement agencies with evidence related to an incident under investigation pursuant to a lawful request and in accordance with applicable laws.

Only certain employees, video service provider(s), and tenants will have access to information collected through video surveillance only where necessary in the performance of their duties.

All recorded information will be retained in accordance with Primaris’ legal or business practices. Once the recorded information is no longer required to fulfill the purpose for which it was collected and no longer required or permitted to be retained for legal or business purposes, it will be destroyed.

What are you consenting to when you disclose

When you provide personal information to Primaris or our service providers and agents, you are implicitly consenting to us collecting, using or disclosing your personal information in order to fulfill the Identified Purposes. Where permitted by law, we may

personal information to us?

verify your personal information, or obtain additional personal information about you by checking with credit bureaus and other fact collecting and verifying entities to assist us in fulfilling the Identified Purposes.

Your consent

Your knowledge and consent are required before we may collect, use or disclose your personal information, except in special circumstances.

You may provide consent to us to use personal information in different ways (e.g., through brokers). Depending on the type of personal information collected from you, and the purpose for which the information is collected, your consent may be express or implied, and may be given orally or in writing.

How can you refuse or withdraw your consent?

You may refuse or withdraw your consent at any time subject to legal or contractual restrictions. Please note, however, that refusing or withdrawing your consent may affect our ability to provide you with the services that you receive or would like to receive. To refuse or withdraw your consent, you should contact our Privacy Officer at the address or telephone number listed below.

How long do we keep your personal information?

Your personal information is retained only as long as is necessary to fulfill the Identified Purposes or as may be required to comply with applicable laws. Primaris uses commercially reasonable safeguards when storing or destroying your personal information in order to prevent unauthorized access.

Your role in keeping information accurate.

We try to ensure that the personal information we collect about you is accurate, complete and up-to-date. However, it is up to you to inform the Primaris representative with whom you are dealing, promptly, of a change of name, address, bank account number or other relevant personal information. If you believe that the personal information in our records may be inaccurate, let us know and we will correct it. If your personal information has been disclosed to third parties, we will convey the corrected information to them, if necessary.

How do we protect your personal information?

Whether in electronic or paper-based format, Primaris has controls to maintain the security of operations and information systems. Physical access to those areas where information is gathered, processed or stored is restricted to authorized employees. Appropriate controls are in place over computer systems and data processing procedures and these controls are reviewed on an ongoing basis to ensure compliance with our security and privacy policies.

We require third parties who receive your personal information from us to have privacy practices that meet our standards.

Your right to access your personal information.

You have a right, subject to certain exceptions, to access your personal information in our possession or control. You also have a right to know which third parties have received your information from Primaris.

How do you access your personal information?

Please make your request in writing to Primaris' Privacy Officer, stating as specifically as possible which personal information you are requesting.

We will try to respond to such requests as soon as possible, and will advise you if for some reason we cannot respond right away. There may be a charge for retrieving this information, in which case you will be notified in advance, and may, if you like, withdraw your request. You may also challenge the reasonableness of the charge.

Updated versions of this Privacy Policy are posted on Primaris' website at www.primarisreit.com, or you can direct any queries about this Policy to Primaris' Privacy Officer at the telephone, e-mail address, or mailing address listed below.

How to contact us:

For more information, to file a complaint, to make enquiries, or to opt out of all or parts of this Policy, please contact Primaris' Privacy Officer:

Mordecai Bobrowsky
Privacy Officer
26 Wellington Street East, Suite 400
Toronto, ON M5E 1S2

416-642-7851
mbobrowsky@primarisreit.com

If you have a complaint, we want to know about it.

If you have a complaint related to this Privacy Policy or any of our procedures, contact our Privacy Officer. We will take the steps necessary to resolve the issue.

If we are not able to resolve your concern, or if you have any other concerns about Primaris' Privacy Policy and procedures, you may contact the Office of the Privacy Commissioner of Canada or, if applicable, the appropriate provincial Privacy Commissioner. Primaris' Privacy Officer will provide you with this contact information upon request.