

# Privacy Policy

## Introduction

This Privacy Policy (the "Policy") describes the practices of Kenron Estates and its subsidiaries KMT & Associates, and Kenron Residents Association, in relation to the collection, use, disclosure and protection of Personal Information (as defined below). At KENRON ESTATES, we are committed to protecting your privacy through practices that limit the collection, use, disclosure, disposition and destruction of Personal Information to what is necessary for the effective operation of our business. This Policy was created to inform you of our commitment to protecting your Personal Information and is based on the general principles in Schedule 1 of the federal Personal Information Protection and Electronic Documents Act. This Policy also includes information regarding KENRON ESTATES's compliance with Canada's Anti-Spam Legislation (CASL).

## Definition of Personal Information

Personal Information includes any factual or subjective information about an identifiable individual. Some examples of Personal Information which KENRON ESTATES may collect from you are:

- Name
- Gender
- Age
- Home address
- Phone number
- Email address
- Family status
- Social insurance and other ID numbers
- Income and other Financial Information Personal References
- Employment information (past and present)

## Purpose for the collection and use of your Personal Information

KENRON ESTATES collects Personal Information from individuals applying for a lease, and from its tenants and guarantors under lease. KENRON ESTATES uses the Personal Information in connection with the services requested and/or provided, including (i) determining your suitability for a lease and (ii) the ongoing administration of your lease and the obligations thereunder. Examples of the manner in which your Personal Information may be used by KENRON ESTATES include:

- disclosing such information to any co-tenant or guarantor or to any third-party payor of your rent if required under your tenancy agreement or related housing agreement;
- confirming your income;
- sharing information with credit reporting agencies to evaluate your credit worthiness in connection with an application to lease;
- disclosing such information to former and present employers, former and present landlords, personal references, and present banking institution, all of whom are named by you in documents submitted to us so that we may contact them as part of the process of evaluating your lease application;
- contacting you should matters relevant to your tenancy arise;
- contacting you regarding the administration of the lease or the tenancy;

- enforcing the terms of your purchase or tenancy agreement, including collection of any judgment that may be obtained against you as a consequence of breach of the agreement;
- disclosing such information to one or more providers of any security alarm system, cable television, telephone, telecommunication, hydro-electricity, water/hot water, gas and/or other similar or related services to you and who are restricted from using your personal information other than for the purpose of contacting you for the provision of such services, and all of whom are disclosed on Schedule "A" of this Policy from time to time;
- disclosing such information to third parties who may have access to such personal information incidentally through their administration and servicing of software used by us in our business operations;
- processing employment applications and other employment-related matters, such as paycheques, tax receipts and tax filings, disclosing information to an insurance company for the purpose of providing health benefits, or, in the case of contract workers or prior applicants for employment, contacting them for further work;
- disclosing to third parties in connection with a disposition of your building, an assignment of your lease agreement, obtaining financing or otherwise as required or permitted by law;
- and disclosing such information to any additional person or business entity, where you further consent to such disclosure.

## Consenting to our collection, use and disclosure of your Personal Information

The collection, use or disclosure of your Personal Information by KENRON ESTATES requires your knowledge and consent. At certain times, your consent for the collection, use and disclosure of your Personal Information may be implied from the manner in which it is collected. For example, when you provide us with your Personal Information in connection with a lease, you have implicitly consented to KENRON ESTATES collecting, utilizing and disclosing your Personal Information in a manner necessary to determine your suitability for, and administer, your lease as further described in the paragraph above. Your consent may also be expressly provided by you. If KENRON ESTATES collects, uses or discloses Personal Information for purposes other than those described above, prior to the collection, use and/or disclosure of such Personal Information, unless required to be disclosed by law, you will be informed of, and your consent obtained prior to, KENRON ESTATES's collection, use and/or disclosure of that Personal Information. If we intend to use and/or disclose Personal Information that we previously collected for a new purpose which is not authorized under applicable laws, your consent will always be obtained before we use and/or disclose it for that new purpose.

You may always choose not to supply KENRON ESTATES with your Personal Information. Furthermore, previously granted consent may be withdrawn at any time by notifying the KMT & Associates Administration Office in writing.

## Collection, Use and Disclosure of Personal Information Without Consent

There are certain circumstances where we may, or may be required to, collect, use or disclose your Personal Information without your knowledge or consent. Those circumstances include: if the disclosure is required by law, provided to our lawyers, for the purpose of collecting a debt you owe to us, in compliance with a subpoena, warrant, or issued order made by a court, person or body with jurisdiction to compel the production of information, or to comply with rules of court relating to the production of records.

Disclosure may also be made to a government institution or investigative body that has made a request for the information, identified its lawful authority to obtain the information and indicated that: it suspects that the

information relates to national security, the defence of Canada or the conduct of international affairs, the disclosure is requested for the purpose of carrying out any investigation relating to the enforcement, gathering intelligence for the purpose of enforcing, or enforcing any law of any jurisdiction, or the disclosure is requested for the purpose of administering any law of Canada or a province. Disclosure may be made to an investigative body if the disclosure is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province.

Various government agencies (e.g., Canada Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. Also, upon our initiative, we may also disclose Personal Information without your knowledge or consent if the information is used for the purpose of acting in respect of an emergency that threatens the life, health, or security of an individual, or has been collected under circumstances in which consent is not required. If information regarding an identifiable individual is disclosed to a person who needs the information because of an emergency that threatens the life, health or security of an individual and, if the individual whom the information is about is alive, we will inform that individual in writing of the disclosure without delay.

## Amount of Personal Information collected by KENRON ESTATES

The amount of Personal Information collected by KENRON ESTATES shall be limited to what is necessary for the identified purpose of that collection.

## Retention of your Personal Information

KENRON ESTATES will retain your Personal Information for as long as it is necessary to fulfill the purpose for which it was collected and to comply with applicable laws. After the Personal Information is no longer necessary either for the purpose for which it was collected or to comply with any laws it will be destroyed, erased, or made anonymous.

## Protection of your Personal Information

KENRON ESTATES will protect your Personal Information in a manner that is consistent with and appropriate to the sensitivity of that Personal Information. Our handling of your Personal Information will respect its confidential nature at all times from the time of its collection until its ultimate disposal or destruction.

KENRON ESTATES undertakes to use reasonable efforts to maintain the accuracy, completeness and currency of your Personal Information that is held by KENRON ESTATES as is necessary to fulfill the purpose for which it was collected and is to be used. We may from time to time ask you to confirm the accuracy of your Personal Information for such purpose.

## Use of Audio Equipment and Recordings

There are circumstances under which KENRON ESTATES may make audio recordings of its employees, contractors, or tenants. There are several purposes for making the recordings; they include: situations where there are work-related performance issues in respect of KENRON ESTATES's role as employer, to ensure the safety of the workplace, to ensure productivity, and to prevent harassment.

Audio recordings may be made during meetings, interviews, or telephone calls between the KENRON ESTATES and its employees. Audio equipment may be operating at other times. Information recorded by the audio

equipment may capture communications of any of the following persons: the employer, employee, residents, tenants, contractors, and the general public.

## Accessing your Personal Information

Access to your Personal Information held by KENRON ESTATES may be requested by contacting the KMT & Associates Administration Office in writing. Upon such written request, you shall: (a) be informed of the existence, use and disclosure of your Personal Information and (b) be given access to that Personal Information. Any questions with regard to requesting access to Personal Information may be addressed to the KMT & Associates Administration Office.

## Changes to our Privacy Policy

KENRON ESTATES reserves the right to change this Privacy Policy from time to time. If we make a material change, this Privacy Policy will be updated accordingly. We recommend that you periodically review this Privacy Policy, which is available in our site office and on our website [www.kenronestates.com](http://www.kenronestates.com), so that you are aware of any changes. Your continued reading of the policy and use of our site following the posting of any changes to this Privacy Policy shall constitute your acceptance of these changes.

## Questions or concerns about our privacy practices

Please address any questions or concerns about our compliance with this Policy or our privacy practices generally to the KMT & Associates Administration Office.

If you remain unsatisfied after discussing the matter with our KMT & Associates Administration Office, please contact the Privacy Commissioner of Canada at <https://www.priv.gc.ca> or at the following address:

Office of the Privacy Commissioner of Canada  
30, Victoria Street, Gatineau, Quebec, K1A 1H3

Toll-free: 1-800-282-1376 Phone: (819) 994-5444 TTY: (819) 994-6591