

## Privacy Policy

We are committed to protecting personal information and respecting your privacy. Our privacy policy (“policy”) explains how we handle the personal information we collect, in both physical and digital form, as part of our day-to-day business and lets you know about your rights when it comes to your personal information.

In this policy we refer to ourselves – GWL Realty Advisors Inc. – as “GWLRA”, “we”, “our” and “us”.

We may update this policy from time to time. If we do, we’ll post a notice on our website. Updates are effective on the date shown on this policy.

### What is personal information?

Personal information is information that either on its own or combined with other information allows an individual to be identified. Examples include your name and address, as well as more sensitive information such as your financial records.

Learn more about how we collect, use, share, and protect your personal information as well as your privacy rights:

- [How we collect personal information](#)
- [How we use personal information](#)
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- [How we protect personal information](#)
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### How we collect personal information

GWLRA manages commercial properties on behalf of landlords or building owners. In the course of our business, we may collect your personal information in three ways – directly from you, from other people and organizations, and from your use of our websites, mobile applications or other digital services.

We collect personal information directly from you throughout our relationship with you. For example, we may collect personal information through paper or online forms, on the telephone, through online chat, or through email.

We may also collect your personal information from other people and organizations, such as our commercial tenants, credit agencies, recruitment agencies, or other third parties authorized to share your information with us.

When you visit our website or use our mobile applications (including the VC Complex App) or other digital services (collectively “Online Services”), we’ll also collect your personal information using cookies or similar tracking technologies (which we will refer to collectively as cookies in this policy). Please review our [Online Services Privacy Notice](#) for more information about cookies. We may also use QR codes to collect your personal information for several purposes including to use it as a ticket for an event, for event registration, or to access forms.

## Type of personal information we collect

Personal information we collect about you may include:

- Identification information, such as name, residential or business address, telephone number and e-mail address, date of birth and other identifying information.
- Social insurance number for commercial tenants who are sole proprietors.
- Workplace information, such as employer name and place of employment.
- Vehicle information, such as vehicle make, model, colour and license plate number.
- Emergency contact information (for you or a person you name as your emergency contact), such as name, address, telephone number.
- Information submitted in connection with a job application, including qualifications, career experience and educational background.
- Medical information, such as mobility or other requirements in the event of an emergency.
- Information that we collect through security systems or other building systems such as video surveillance cameras, people counting tools, access card systems, amenity, room, and elevator booking systems, tenant portals, mobile applications, digital offerings and similar systems and tools.
- Personal Information about accidents or near-miss incidents on our premises.
- Witness signatures for a witness statement.
- Information we collect at events including photographs, audio, and videos.
- Information submitted when you provide feedback to us, or participate in surveys, contests or promotions.

We may collect other information as described to you at the time of collection or through a separate privacy notice.

## How we use personal information

Depending on how you interact with us, the personal information that we collect may be used for the following purposes.

To provide GWLRA products and services, including to:

- Verify your identity and eligibility for our products and services.
- Administer your access to building areas, amenities, products and services.
- Process payments.
- Administer and enforce our agreements.
- Create, maintain, and administer your account for Online Services.
- Tailor your experiences on our Online Services.
- Administer your participation in surveys, sweepstakes, events, programs, and promotions.

To improve our business, including to:

- Perform data management, analytics and statistical analysis.
- Help diagnose and address technical problems with the Online Services.
- Optimize and improve customer service and manage relationships.

#### For communications & marketing purposes, including to:

- Respond to your questions, feedback, comments, inquiries, or requests for information.
- Market and promote our buildings, amenities, services, and business.
- Invite you to participate in surveys, sweepstakes, events, programs, and promotions.

#### For safety, security & risk management purposes, including to:

- Accommodate special needs, e.g., during emergency events.
- Monitor our buildings, amenities, facilities, and surrounding areas for safety and security purposes including through video surveillance.
- Administer access to our buildings, amenities and facilities for general security purposes including prevention of potentially prohibited or illegal activities, including through the use of access cards and access credentials.
- Manage entry to parking.

#### For employment, including to:

- Evaluate applications.
- Engage in recruitment-related activities.

#### For compliance, legal and regulatory reasons, including to:

- Conduct “know your client” and related screenings (such as anti-money laundering/anti-terrorist financing screenings) in connection with an application for commercial tenancy.
- Meet legal or regulatory requirements, for example tax reporting, record keeping, and occupational and health obligations.
- Administer waivers and assumption of risk for building access.
- Respond to and report emergencies or other incidents including using video, other surveillance for investigation, insurance, and other risk management.
- Protect our interests in a civil proceeding or a proceeding involving criminal activity, fraud, or misrepresentation.
- Evaluate, complete or administer a purchase, sale, reorganization or financing of all or a part of our business or assets.
- Enforce website terms of use.

## How we share personal information

We share your personal information with other people and organizations as described in more detail below. Some of these people and organizations may be located outside your province of residence or outside Canada. In such cases, your information will be subject to the laws of the other jurisdiction, including any law permitting or requiring disclosure of the information to government agencies, courts, and law enforcement in that jurisdiction.

We may share information with our commercial tenants about how their workers are using and interacting with our buildings, amenities, and Online Services. In most cases the information that we share with our commercial tenants will be aggregate (e.g., number of workers who have installed or used a workplace mobile application). However, in some circumstances we may share identifiable information. For example, we may share access card information with a tenant in the event of a security incident, to monitor compliance with and enforce workplace policies or government orders, or in situations relating to health,

safety or security of persons or property. We may exchange personal information with tenants in order to administer a user's access to, or termination from, Online Services. If you submit feedback or a complaint that is more appropriately handled by our commercial tenant, we will share your information with the tenant so they can address your concerns.

#### We may disclose your personal information to:

- Brokerages & Real Estate Agencies for the purposes for filling and managing tenancies.
- Operations and maintenance support providers that provide regular upkeep and emergency repairs, such as plumbing, electricity, and cleaning services.
- Credit reporting agencies for the purposes of evaluating your application for tenancy.
- Governmental authorities to comply with our legal and regulatory obligations, including for tax reporting purposes.
- Financial institutions and payment processors for the purposes of processing your deposit or rental payments.
- Creditors to assist us when there are outstanding balances on transactions with GWLRA.
- The owner of a GWLRA managed property and/or Landlord for the purposes of managing the commercial tenancy and providing statistical analysis and reporting.
- Companies that provide utilities or other services such as water, electricity, gas, parcel lockers, EV charging, and parking, for service provision, billing and customer service purposes and in some cases for marketing purposes.

#### We may also share your personal information with service providers who perform services on our behalf, including:

- Call centre operators.
- Tenant screening and background check providers.
- Recruitment and human resources support providers.
- Information technology and software development, support and maintenance service providers including cloud hosting providers and service providers who develop, host and maintain our Online Services and smart building technologies.
- Information and physical security providers.
- Collection agencies.
- Record storage companies.
- Marketing and analytics providers.
- Legal and professional advisors (including lawyers, accountants, financial advisors, insurers and claims adjustors).

GWLRA uses video surveillance to deter crime and protect the safety and security of our tenants as well as of our and their employees, workers and visitors. GWLRA security cameras are placed exclusively in common areas of the property. When a crime has occurred, we use and share the video with police to assist police in the ensuing investigation. In some buildings, occupants may be able to access certain security cameras through in-suite devices or mobile applications. For example, some buildings allow occupants to view certain common areas or amenities to assess occupancy levels. In some buildings,

video surveillance is also used to manage entry to parking. GWLRA employees and service providers may be able to access certain cameras through mobile applications or other digital tools.

We may use or disclose your personal information in connection with an investigation or civil or criminal proceeding, to detect, prevent or investigate any unlawful or unauthorized activity, including fraud or breach of an agreement, or when permitted or required by law (such as pursuant to a lawful demand for such information from law enforcement).

We may use and disclose personal information to parties connected with the proposed or actual financing, insuring, sale or other disposal of all or part of our business or assets, for purposes connected to evaluating and performing the transaction. These purposes may include determining whether to proceed with the transaction or business relationship, or fulfilling any records or other reporting requirements to those parties. Your information may also be transferred to a successor property manager designated by the landlord or owner of your building.

## How we protect personal information

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

Our employees receive annual information security, privacy, and Code of Conduct training. We limit access to personal information to our employees who require access for the purposes described in this policy, including employees on our commercial leasing team and in our operations, risk, legal, audit, finance and marketing departments. We have also developed internal policies that outline our employees' responsibilities with respect to the management of personal information throughout its lifecycle.

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.

Please note that the security of email communication can't be guaranteed. Sensitive information (including personal information such as your Social Insurance Number or birthdate) should not be sent to us by email. If you wish to communicate or send private or confidential information to us or to a third party, you may do so by other means.

## Retaining your personal information

We'll only keep your personal information for as long as we need it to fulfill the purposes for which the information was collected, to meet our legitimate business needs to retain records for reasonable periods (for example, to defend claims), and to comply with applicable laws. We have developed record retention policies and procedures that outline our practices with respect to the retention and destruction of personal information. When the retention period outlined in these policies has been satisfied, personal information will be anonymized, or physically or digitally destroyed.

### *Where your personal information will be stored*

Personal information may be stored by GWLRA or its service providers in physical files or on secure servers. Personal information may be stored or otherwise processed in:

- Any province in Canada

- The United States
- The United Kingdom
- The European Union
- India
- The Netherlands

## Your privacy rights and how to manage them

When it comes to your personal information at GWLRA, you have the following rights:

### The right to access your personal information.

- 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.

### The right to correct your personal information if it's inaccurate or incomplete.

- 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 in writing to change or correct information we have collected about you. Where your personal information is inaccurate or incomplete, we will make any necessary changes.

### The right to request deletion of your personal information.

- In certain circumstances, you have the right to request in writing that your personal information be deleted. We will honour your request in accordance with our legal obligations.

### The right to change your consent options.

- We collect, use, and disclose your personal information with your consent for the purposes identified, or as permitted or required by law.
- We may obtain your consent in different ways. It may be expressed in writing or be implied, provided to us verbally, electronically, or through an authorized representative. In some cases, we may rely on a third party to obtain consent on our behalf (for example, your employer).
- If you provide us with personal information relating to someone else, such as a visitor or guest, we will assume that you have obtained consent from such individual to allow us to process their personal information for the purposes for which you are providing it to us.
- 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. You may withdraw your consent by emailing or writing the Privacy Officer, GWLRA at the contact information listed at the end of this policy.
- Where previously provided, you may withdraw your consent to use your SIN for identification and record keeping purposes.

### The right to ask or submit a complaint about our privacy practices at GWLRA.

- This Privacy Policy is always available to you and describes our privacy practices.
- Upon written request to the Privacy Officer (GWLRA), we will respond to inquiries about our practices relating to the management of personal information.



- You can also contact the Privacy Officer (GWLRA) if you have any complaints regarding our management of personal information. We have developed internal policies regarding the handling of complaints.

#### The right to ask about any decision we made using automated processing.

- This includes being able to submit observations about the decision-making process to us.

There may be instances where we're unable to fulfill your privacy request, subject to certain restrictions or laws. If this happens, we'll let you know as soon as possible.

## Contact Us

Contact us by writing to our:

Privacy Officer

GWL Realty Advisors Inc.

Suite 1000, 33 Yonge Street | Toronto, Ontario, Canada | M5E 1G4

[gwlra\\_privacy@gwlra.com](mailto:gwlra_privacy@gwlra.com)

## Online Services Privacy Notice

This Online Services Privacy Notice supplements the GWLRA Privacy Policy and provides additional information about our privacy practices relating to your use of our Online Services.

Certain Online Services may require or ask you to provide personal information or may otherwise involve the collection of personal information. The personal information that is collected will depend on the features and functionality of the Online Services that you use but may include the following:

### Registration information.

For Online Services requiring you to register, we may ask you to provide your name, employer name and location, business telephone number and business email address. We will match this information with information collected from your employer to verify your eligibility for the Online Services. We will also ask you to create a username and password. For certain types of services, we may request your mobile number (for example, to send you verification codes). We use this information to confirm your identity when registering for or logging in to the Online Services, to provide you with the Online Services you request, provide technical support, respond to your requests, inquiries, or complaints, and to provide you with information relating to the Online Services (such as notification of updates to the Online Services terms of use).

### Information collected through building systems.

We may also collect personal information through building systems that are connected to the Online Services such as surveillance cameras, people counting systems, access card systems, room, elevator, or amenity booking systems, and heating, cooling, and lighting systems. This information may include your photograph (for example, your pass card photograph), date, time, and location where pass card was used, video footage from surveillance cameras, the location, date, time and duration of a room, elevator or amenity booking, and your preferred temperature and lighting settings. If you book a meeting, we may collect the email addresses of meeting attendees to send them an invitation.

### Information about your use of Online Services.

We collect information about your use of the Online Services you choose to use, including date and time of access, duration of use, actions performed, features used, and whether you click on links to third party services accessible through the Online Services. We use this information to provide the Online Services. We may also use this information to generate aggregate statistics to perform analytics and to help us improve the Online Services. For example, we may use this information to understand which Online Services are most popular, or to provide information to users about when a particular amenity is booked or likely to be busy so they can plan their use of amenities accordingly.

### Location information.

Certain Online Services offer location-based functionality, such as wayfinders, maps and access card and elevator booking systems. In order to use these services, we will collect information about your location or the location of your device. You may be asked to enter this information manually, or to allow your device to share this information with us.



### Calendar and contacts.

We may offer Online Services that allow you to integrate your calendar or address book with the Online Service (for example, to facilitate meeting room or other amenity bookings and invitations). If you choose to use these integrations, we may collect information from your calendar or address book to provide the Online Services.

### Purchases.

If you choose to make a payment through the Online Services, you will be asked to provide your payment card information and billing information to process the transaction. Payment card information is processed by our third-party service provider and is not retained by us.

### Work Orders.

If you submit a work order through the Online Services, we will use the information you provide to process and communicate with you in respect of your work order. In certain circumstances you may also be asked to provide a signature.

### User submissions.

The Online Services may include features that allow you to post or share content with other users. Please note that any information or images you post or share in these areas are publicly available and may be accessible to anyone. We cannot control what others do with this content. As such, you should not use these features to share personal information and should exercise caution and good judgement when posting content through these features.

### Communications.

We use the personal information we collect to communicate with you in respect of the Online Services, including by email, in-app notifications, or push notifications. If you email or otherwise communicate with us through the Online Services, we will use the personal information you choose to provide to reply to you.

### Forgotten Username or Password.

If you forget either your username or password, you may be able to recover them by going through the Forgotten Username or Password feature, where available. To confirm your identity, we may match what you enter against the information collected during your registration.

### Links to other websites or services.

Some of our Online Services contain links to third party websites, apps, mobile apps or digital platforms or services ("Third-Party Services") or allow you to interact with Third Party Services that are not managed, maintained, or controlled in any way by GWLRA. We don't control and are not responsible for any of these Third-Party Services or their content, and as a result such links or features 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 services. These features and links to services that aren't maintained or controlled by GWLRA are provided for convenience only.

### Cookies.

When you visit our Online Services, we'll also collect your personal information using cookies or similar tracking technologies (referred to collectively as "cookies"). We and our analytics and advertising partners use this information to improve your experience on our Online Services, understand how users interact with our Online Services, and for tailored advertising purposes. You can control cookies through the Cookie Consent Manager on our website, through your mobile device settings, or by configuring your web browser accordingly. If you decline cookies, this may lead to reduced website functionality.

### The type of data being collected.

GWLRA and our service providers gather data using cookies and similar technologies when you interact with our websites, apps, and other Online Services. The data we collect includes IP address, device ID or other unique identifiers, Internet service provider name, device model, browser type, device parameters, information about how visitors explore our Online Services 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.

### With whom the data is shared.

We use web analytics tools on our Online Services, including our website and mobile applications (Google Analytics and Adobe Analytics). Advertising tools are provided to us by advertising partners (Google, Facebook, LinkedIn, and X) 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 Online Services or in reaction to online advertisements.

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