

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 Residential Inc. – as “GWLRA Residential”, “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. When applicable, this includes information about other people, such as your spouse, common-law partner, and children.

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](#)
- [How we share personal information](#)
- [How we protect personal information](#)
- [Your privacy rights and how to manage them](#)
- [Contact Us](#)

How we collect personal information

We 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 applications, on the telephone, through online chat, or through email.

We may also collect your personal information from other people and organizations. These can include your employer, credit reporting agencies, prior landlords, and personal references. It can also include third party websites such as Zumper, Kijiji, Rentals.ca or RentFaster, if you send an inquiry or request to book a tour to visit one of our properties through these sites. We may also collect information about you from our tenant (for example, if you are a resident or guest of the tenant).

When you visit our website or use our mobile applications 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

The type of personal information we collect about you will depend on how you interact with us and may include the following.

Identification and Contact Information, such as:

- Name
- Residential address
- Phone number
- Email address
- Signature
- Name and contact information for emergency contact
- Date of birth
- Social Insurance Number (SIN)
- Government issued identification information, such as a driver's license number
- Access card information

Online Services, Identifiers & Tracking Information, such as:

- Log-in credentials and answers to authentication questions
- IP Address
- Cookies data & behavioural data (for example, the pages you visit and for how long)
- User preferences

Financial Information, such as:

- Banking Information
- Income
- Credit Card information
- Credit History
- Tax Identification Numbers

Employment Information, such as:

- Place of employment
- Job Title
- Employment History
- Resume
- Income Details

Transactional or Service Information, such as:

- The details of a tour you have booked at one of our properties (time and date, in person or virtual, type of unit and the property)
- The parameters of your property searches (such as number of bedrooms, move in date, rental budget, and occupants)
- Records of personal property, services or products purchased, obtained or considered withdrawals
- Vehicle information (make, model and license plate number) for parking passes and permits

Biometric Information, such as:

- Video footage
- Photos
- Audio recordings

Medical Information, such as:

- Mobility requirements (accessibility and accommodation required for emergency use cases)
- Medical history (incident reporting that may involve health-related events)

Personal and Relationship Information, such as:

- Information about and from personal references and emergency contacts
- Information about your relationships with other occupants of your unit

We may collect other information as described to you at the time of collection (such as through a separate privacy notice) or as otherwise permitted or required by law.

How we use personal information

GWLRA Residential collects personal information to manage properties on behalf of landlords and property owners.

Depending on how you interact with us, the personal information that we collect may be used to:

Provide you with GWLRA Residential services, including to:

- Process your application for tenancy, including to verify your identity and evaluate your eligibility.
- Make reference calls to prior landlords or personal references, or request verification of your employment history with your employer.
- Process payments and collect amounts owing to us.
- Administer and manage your tenancy.
- Enforce rental agreements, parking agreements, lease agreements, website terms of use, and any other types of client agreements as applicable.
- Create, maintain, or administer your Applicant/Resident log-in account, including to facilitate forgotten username and password recovery.

- Administer the Online Services, including to tailor your experience on the Online Services, maintain the security of Online Services, and diagnose and address any technical problems (please see the [Online Services Privacy Notice](#) for further details).
- Report income to you and Canada Revenue Agency, including providing a T5 form if required.
- To facilitate the provision of third-party service offerings, such as telecommunications and internet services, and mail and parcel services.
- Complete the Hydro Quebec enrolment form for Quebec residents.

Improve our business, including to:

- Analyze and optimize customer service and business processes, perform internal data management and analytics, optimize and improve customer service and manage relationships, and for statistical analysis. For these purposes, we may use data and analytics technologies, including artificial intelligence.

Communications & Marketing, including to:

- Respond to your questions, comments, inquiries or requests for information.
- Market and promote our buildings, amenities, services, and business.
- Administer your participation in surveys, sweepstakes, programs, events and promotions.
- Send you information about GWLRA Residential and its affiliates, including information about products, services, offers and events.

Safety, Security & Risk Management, including to:

- Accommodate special needs.
- Carry out video surveillance and manage access cards and other information for general security purposes including detection and prevention of potentially prohibited or illegal activities.
- Manage entry to and use of parking.
- Incident reporting and investigations, including collecting information in witness statements.

Compliance & Legal, including to:

- Meet legal or regulatory requirements, for example occupational and health obligations.
- Collect waivers and assumption of risk agreements for building access.
- Carry out emergency or incident reporting, or surveillance, for investigation, insurance, and other risk management purposes.
- Protect our interests in a civil proceeding or a proceeding involving criminal activity, fraud, or misrepresentation.

We collect Social Insurance Numbers (SIN) where required by law for tax-reporting purposes and in Quebec for completion of the Hydro Quebec enrolment form. Where you provide consent, we may also use your SIN for identification and record-keeping, such as keeping your information separate from others with similar names. Where you have consented to use of your SIN for identification and record-keeping purposes, you can withdraw this consent at any time.

How we share personal information

We share your personal information with other people and organizations that help us carry on our business, or that provide services to you, 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 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.
- Financial institutions and payment processors for the purposes of processing your deposit or rental payments.
- The owner of a GWLRA Residential 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, parking, EV charging, and internet 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:

- Tenant screening and background check 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 adjusters).

GWLRA Residential uses video surveillance to deter crime and protect the safety and security of our residents and employees. 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 temporary access to lobby cameras to identify a visitor. In some cases, the in-suite device may have functionality to take and store photos taken through these cameras. These photos are stored locally on the device. In some buildings, video surveillance is also used to manage entry to parking. GWLRA Residential 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 residential 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 Residential.

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 Residential 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 Residential, 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.
- If you provide us with personal information relating to someone else, such as a spouse, common law partner, 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.
- If you authorize your child or ward under the age of 14 to use our Online Services, or otherwise provide us with their personal information, you are consenting on their behalf to our processing of their personal information as described in this policy.

- 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 Residential 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 Residential.

- 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

Online Services Privacy Notice

This Online Services Privacy Notice supplements the GWLRA Residential 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, telephone number and email address, and ask you to create a username and password. 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.

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 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 Residential. 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 Residential 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 Residential 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 Residential 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.