

# CONCORD ADEX INC.

## PRIVACY POLICY

This policy statement (the “policy”) sets out the privacy policies and practices for Concord Adex Inc. and its subsidiaries and affiliates (collectively, “Concord”) with respect to the collection, use and disclosure of personal information. This policy may be updated by Concord giving reasonable notice of the revised Policy (including by e-mail or by posting at Concord’s website at <http://www.concordadex.com/privacy>), and this Policy may be supplemented or modified by agreements entered into between Concord and an individual from time to time.

Personal information is any information about an identifiable individual, as defined under the *Personal Information Protection Act* (ON) or other applicable laws.

### **1. Privacy Officer**

The Privacy Officer is responsible for ensuring Concord’s compliance with this policy statement.

Privacy Officer  
23 Spadina Avenue  
Toronto, ON M5V 3M5  
Tel: 416-813-0333  
Fax: 416-813-0300

### **2. Collection, Use and Disclosure Purposes**

Except where otherwise required or permitted by law, Concord will inform individuals of the purposes for the collection, use or disclosure of the individual’s personal information, prior to collecting, using or disclosing that personal information.

Concord collects information from customers and potential customers through various means including guest registration sign-up sheets, campaign registrations, web-form registrations, purchase and sale agreements and customer survey responses. The type of information collected will vary depending on the means through which an individual submits his/her personal information. The type of information collected may include an individual’s name, residential address, e-mail address, home phone number, occupation, employment status, age group, current residential ownership details, whether first time buyer, financial and credit information, real estate investment purposes and preferences, preferred marketing mediums and specific comments. For security reasons, Concord may also utilize video surveillance to monitor its premises from time to time.

Concord uses information collected from customers and potential customers to provide products or services, to respond to requests for information regarding Concord’s products and services, for input on preferred features for future developments, mailing contacts for Concord publications and newsletters, special events marketing and other marketing research activities, and for additional purposes that may be identified at or before the time that the information is collected. Concord also uses personal information from purchasers for accounting and transaction completion purposes. Concord may disclose personal information to legal, financial, and other professional advisors or in connection with the sale or reorganization of all or part of its business or operations.

Requirements for consent to collection, use, or disclosure of personal information vary depending on circumstances and on the type of personal information that is intended to be collected, used or disclosed. In determining whether consent is required and, if so, which form of consent is appropriate, Concord will take into account both the sensitivity of the personal information at issue and the purposes for which Concord will use the information. Consent may be express, implied (including through use of opt-out consent where appropriate), or deemed. For example, if an individual provides his/her mailing address and requests

information regarding a particular product, consent to use the address to mail product information to the individual is implied.

On giving reasonable written notice to Concord, an individual may withdraw consent to the collection, use or disclosure of his or her personal information. Upon receipt of this withdrawal, Concord will notify the individual of the likely consequences of withdrawing his or her consent. Except where otherwise required or permitted by law, Concord will then stop collecting, using or disclosing the individual's personal information.

### **3. Limits to the Collection of Personal Information**

Except where required or permitted by law, Concord will limit the collection of personal information to that which is necessary to fulfill the purposes for which it is collected. Personal information will be collected by fair and lawful means.

### **4. Use, Disclosure and Retention**

Concord will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Once the information is no longer required to fulfill its intended purposes, and is no longer required or permitted to be retained for legal or business purposes, it will be destroyed, erased or made anonymous.

By "opting-in" the individual has given express consent to Concord sending mail, emails or text messages through the information provided, promotional messages such as newsletters, announcements, press releases and event invitations regarding their current and future products and services.

By "opting-in" the individual consents to receiving calls or text messages by the selected means of contact by or on behalf of members of Concord at that number to discuss their current and future products and services.

Individuals may withdraw your consent at any time.

Concord may be reached by email at [Marketing@ConcordAdex.com](mailto:Marketing@ConcordAdex.com), or at the following mailing address: Concord Adex Inc., 23 Spadina Avenue, Toronto, ON, M5V 3M5, Attention: Marketing.

Concord may disclose certain personal information to third party service providers and to affiliated entities in order to carry out work on behalf of Concord. Prior to making this disclosure, Concord will take appropriate steps to ensure that such recipients safeguard the personal information and use the information only for authorized purposes.

### **5. Accuracy**

Concord will make reasonable efforts to ensure that any personal information collected by it, or on its behalf, is accurate and complete if the personal information is likely to be used by Concord to make a decision that affects the individual to whom the personal information relates or if the information is likely to be disclosed to a third party.

### **6. Security**

Concord will protect personal information with security safeguards appropriate to the sensitivity of the information. Security safeguards are employed to protect personal information against loss, theft and unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks. The nature of these safeguards will vary depending on the sensitivity of the personal information that has been collected. The methods of safeguards include:

- Physical security measures such as locked filing cabinets and areas
- Security clearances and limiting access on a “need-to-know” basis
- Technological measures such as the use of passwords

Concord will inform employees about Concord’s policies and procedures for protecting personal information and employees will be required to conform to Concord’s Privacy Policy.

## **7. Openness**

Upon request, Concord will make information available about its personal information policies and practices, and its complaint process.

## **8. Individual Access**

Upon written request, with sufficient detail to enable Concord to identify the individual and the personal information being sought, Concord will inform an individual of the existence, use and disclosure of his or her personal information under Concord’s control and will provide access to that information, unless otherwise prohibited or permitted by law. Concord will respond to all requests within 30 days. Concord may extend the time limit for a further 30 days, or, for a longer period, with the Privacy Commissioner’s permission or as otherwise permitted by law.

Upon written request, an individual may request Concord to correct an error or omission in the personal information that is under Concord’s control. If Concord is satisfied on reasonable grounds that a correction should be made, it will amend the information as requested as soon as reasonably possible, and it will send the corrected information to each organization to which it has disclosed that information during the year prior to the date of correction.

## **9. Challenging Compliance**

An individual may direct a complaint concerning compliance with the Policy to Concord’s Privacy Officer.

The complaint must be in writing. Within a reasonable time of receipt of the complaint, the Privacy Officer will conduct an investigation into the complaint. The format of this investigation will vary depending on the circumstances and may or may not involve an interview of the complainant and/or Concord employees conducted by the Privacy Officer.

Within a reasonable time of conclusion of the investigation, the Privacy Officer will inform the complainant, either verbally or in writing, that the complaint is either: (a) denied (if, in the Privacy Officer’s opinion, it has no merit); or (b) allowed (if, in the Privacy Officer’s opinion, the complaint is valid).

If the Privacy Officer allows the complaint, Concord will take appropriate measure necessary to rectify the source of the complaint.

## **Updating this Privacy Policy**

Any changes to our privacy standards and information handling practices will be reflected in this Policy in a timely manner. Concord reserves the right to change, modify, add, or remove portions of this Policy at any time. Please check this page periodically for any modifications. To determine when this Policy was last updated, please refer to the modification date at the bottom of this Policy.