

Privacy Policy

COMMITMENT TO PRIVACY

This website (the “**Site**”) is owned and provided by **UBC PROPERTIES TRUST, which includes its various property management divisions (“UBC Properties”, “we”, “our”, or “us”)**. We are committed to maintaining the security and privacy of your personal information. This Policy documents our on-going commitment to you and has been developed in compliance with applicable privacy laws in Canada.

1. SCOPE OF POLICY

This Policy addresses personal information about individuals and does not apply to information about corporate or commercial entities who are our suppliers or customers/clients. Commercial information may be subject to protection under other policies and practices and through contractual arrangements, including confidentiality agreements. For greater certainty, this Policy does not impose any limits on the collection, use or disclosure of your business contact information by UBC Properties.

2. ACCOUNTABILITY

UBC Properties is accountable and responsible for personal information under its control. UBC Properties has designated a Privacy Officer who is accountable for UBC Properties’ compliance with this Policy.

UBC Properties will adopt procedures to protect personal information, and to receive and respond to complaints and inquiries.

3. PURPOSE

UBC Properties collects your personal information for the following purposes:

- to provide, coordinate and administer property (whether rented or leased) information, products and services requested and to use and disclose the information for any purpose related to the provision of requested property information, products and services including payment by you for the provision of requested property products and services;

- to determine which property products and services may meet your potential needs;
- to provide personal information to any third-party service providers who perform functions or services on our behalf (such as, without limitation, for the purposes of payment processing, performing credit checks, web hosting, IT services and storage);
- to authenticate your identity;
- to communicate with you, including but not limited to responding to your questions or concerns, sending notifications and emails to you about property products and services, soliciting feedback from you, sending you administrative information such as updates to this Policy, and if you have consented to receive such communications in electronic form, sending you newsletters, special offers and general information about property products and services, services and events that are similar to those that you have already purchased, rented or enquired about;
- to enable you to participate in interactive features of the Site when you choose to do so;
- to improve the Site, monitor the usage of the Site, detect, prevent and address technical issues related to the Site;
- to protect us, you and others from fraud and error and to safeguard our financial interests;
- to collect debts owed to UBC Properties;
- to manage or transfer assets or liabilities of UBC Properties, for example in the case of an acquisition or merger, the provision of security for a credit facility or the change of a carrier;
- to comply with legal and regulatory requirements; and
- to use anonymized or aggregated data for marketing purposes.

The purposes listed above are a reasonably necessary part of your relationship with UBC Properties.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is authorized or required by law.

4. WEB ANALYTICS AND REMARKETING

The Site uses web analytics tools to help analyze how the Site is used and to improve visitors' online experience. When you visit the Site, we automatically collect certain information about your device, including information about your web browser type, Internet Protocol ("IP") address, location, device type, operating system, and cookies that are installed on your device (collectively, "**Device Information**"). As you browse the Site, we collect information about the individual web pages or products or services that you view, what websites or search terms referred you to the Site, and information about how you interact with our website (collectively, "**Usage Information**").

We use cookies to track the activity on the Site. Cookies are files with small amounts of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, this may prevent you from taking full advantage of the Site.

Some parts of the Site include social media buttons to promote our social media channels, such as our Instagram, LinkedIn and Facebook channels. These buttons work through pieces of code that come from the social media service providers, and on which we have no influence. To understand how these social media service providers collect, use and otherwise process your personal information via these cookies, please review their privacy policies at:

- Facebook and Instagram:
<https://privacycenter.instagram.com/policy>

- LinkedIn:
<https://www.linkedin.com/legal/privacy-policy>

We also use Google Analytics to monitor and analyze the use of the Site. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Such data is shared with other Google services. Some service providers also allow you to opt out of their use of cookies for advertising purposes, e.g. Google Ad's Settings Page.

5. CONSENT

UBC Properties will obtain your consent to collect, use or disclose personal information except where UBC Properties is authorized or required by law to do so without consent.

Your consent may be express or implied, or given through your authorized representative.

Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify UBC Properties that you do not wish your personal information collected/ used/ disclosed for optional purposes following reasonable notice to you) or otherwise. For example, oral consent could be expressed over the telephone at the time information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application form.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided reasonable written notice of the withdrawal of your consent is given by you to UBC Properties. Upon receipt of your written notice, UBC Properties will inform you of the likely consequences of the withdrawal, which may include the inability of UBC Properties to provide certain products or services for which the delivery of that information is a prerequisite.

You hereby consent to UBC Properties disclosing your personal information to a third-party provider under contract with UBC Properties for the purposes described under Section 3 above. In such circumstances the third party shall be contractually required to hold, protect, and use your personal information in compliance with this Policy and applicable privacy laws and shall not disclose your personal information.

6. LIMITS ON COLLECTION OF PERSONAL INFORMATION

UBC Properties will not collect personal information indiscriminately and will limit its collection of your personal information to what is reasonably necessary to provide a product or service and which is reasonably necessary for the purposes consented to by you. UBC Properties may also collect information as authorized by law.

7. RETENTION OF PERSONAL INFORMATION

Your personal information will only be used or disclosed for the purposes set out above and as authorized by law.

UBC Properties will keep personal information used for at least one year after using it, provided that UBC Properties may elect to destroy such personal information if it is not required to be retained by applicable privacy laws.

UBC Properties will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.

UBC Properties will take due care when destroying personal information so as to prevent unauthorized access to such information.

8. ACCURACY

UBC Properties will make a reasonable effort to ensure that personal information it is using or disclosing is accurate and complete. UBC Properties will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.

If you notify UBC Properties of the inaccuracy or incompleteness of personal information, UBC Properties will amend the information as required. If appropriate, UBC Properties will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, UBC Properties will annotate the

personal information under its control with a note that a correction was requested but not made.

9. SAFEGUARDING PERSONAL INFORMATION

UBC Properties protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

You should be aware that confidentiality and security are not assured when information is transmitted through e-mail or wireless communication. UBC Properties will not be responsible for any loss or damage suffered as a result of a breach of security or confidentiality when information is transmitted by e-mail or wireless communication.

10. PROVIDING ACCESS

You have a right to access your personal information held by UBC Properties.

Upon written request and authentication of identity, UBC Properties will provide you with personal information under its control, information about the ways in which that information is being used and a description of the individuals and organizations to whom such information has been disclosed.

UBC Properties may charge a reasonable fee for providing personal information in response to an access request and will provide an estimate of any such fee upon receiving a written access to personal information request. UBC Properties may require a deposit for all or part of the fee.

UBC Properties will make personal information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, UBC Properties may not be able to provide access to certain personal information. UBC Properties may also be prevented by law from providing access to certain personal information.

Where an access request is refused in whole or in part, UBC Properties will notify you in writing, giving the reason for refusal and outlining further steps which are available to you.

11. CHANGES TO POLICY

To keep pace with economic and technological changes, UBC Properties may revise this Policy from time to time. The revised Policy will be posted on our website, and will come into effect 30 days after it is posted.

12. COMPLAINTS

Any inquiry, complaint or question regarding this Privacy Policy must be directed in writing to the UBC Properties Privacy Officer.

Contact Information:

Privacy Officer
 Donald Matheson
 Vice President and Chief Financial Officer
 UBC Properties Trust
dmatheson@ubcproperties.com
 Ph: (604) 731-3103

13. DEFINITIONS

In this Policy:

The terms "*UBC Properties*" or "*our*" refer to UBC Properties Trust;

"*collection*" means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means;

"*consent*" means voluntary agreement to the collection, use and disclosure of personal information for specified purposes;

"*disclosure*" means making personal information available to a third party;

"*personal information*" means information about an identifiable individual but does not include his or her business contact information. Personal information does not include (a) information concerning corporate or commercial entities or (b) publicly available information. It also does not include information that cannot be associated with a specific individual;

"*Privacy Officer*" means an individual designated by UBC Properties who is accountable for compliance with this Policy by UBC Properties and whose contact particulars are set forth in this Policy;

"*third party*" means an individual or organization other than UBC Properties and you;

"*use*" means the treatment and handling of personal information by and within UBC Properties.

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