

PRIVACY AT GWL REALTY ADVISORS INC.

GWL Realty Advisors Inc. GWL Realty Advisors Inc. (“GWLRA”, “we”, “us” or “our”) manages commercial properties on behalf of landlords or building owners. We are committed to protecting your personal information and respecting your privacy.

In order to provide you with services and products, we may collect, use and disclose your personal information. We know you are trusting us to keep your personal information secure and we take this responsibility very seriously.

The following Privacy Statements and Guidelines describe our commitment to privacy and protecting your personal information:

- **Online Privacy Statement**

The Online Privacy Statement covers the use of personal information collected by GWLRA during your visits to GWLRA websites, mobile applications and other online and digital services that link to or otherwise incorporate by reference this Online Privacy Statement.

- **Privacy Guidelines**

The Privacy Guidelines describe our commitment to privacy and what guides us in protecting the privacy and confidentiality of personal information. They also explain how we collect, use and disclose personal information and provide information about your rights when it comes to your personal information.

- **Social Media Guidelines**

The Social Media Guidelines describe how we may interact with you and treat your personal information on our social media channels.

- **Protecting your privacy outside Canada Statement**

The Protecting your privacy outside Canada Statement describes why your personal information may leave Canada.

ONLINE PRIVACY STATEMENT

GWL Realty Advisors Inc. (“GWLRA”, “we”, “us” or “our”) is committed to respecting your privacy and the confidentiality of information we receive in accordance with this Online Privacy Statement, and with applicable law.

The Online Privacy Statement applies to GWLRA websites, mobile applications and other online and digital offerings (such as tenant mobile applications, digital tools and portals) that link to or otherwise incorporate by reference this Online Privacy Statement (the “Online Services”). It explains how we collect, use and disclose your personal information when you use Online Services. Our Online Services may provide you with additional information about privacy when certain features enable you to enter personal information or ask to use your personal information. Please review this information before using those features.

Personal Information is information about an identifiable individual.

Your Consent

By using Online Services, you acknowledge that you have read and understand this Online Privacy Statement and consent to the collection, use and disclosure of your personal information as described herein. This Statement may be changed without notice to you, so we recommend you review it regularly.

The statement supplements our Social Media Guideline, Privacy Guidelines and any other terms or agreements that may apply to your relationship with us.

Privacy and Confidentiality

We have safeguards in place to protect the security and confidentiality of your personal information. However, the Internet is not a secure place where privacy and confidentiality can be guaranteed. Your confidential use of Online Services can't be guaranteed, and you acknowledge that your use of the Online Services may be subject to access or manipulation by, or disclosure to, third parties. GWLRA is not responsible or liable for any damages that you or any other person may suffer in connection with any such violation of privacy, confidentiality or security.

Collection & Use of Personal Information

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 the information we collect to confirm your identity when registering for or logging in to the Online Services. We also use this information 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 in order 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 amenity bookings and invitations). If you choose to use these integrations we may collect information from your calendar or address book in order 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 in order 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 in order 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 User Name or Password:** If you forget either your user name or password, you may be able to recover them by going through the Forgotten User Name or Password feature, where available. To confirm your identity, we may match what you enter against the information collected during your registration.
- **Surveys, contests and promotions.** From time to time, we may ask for feedback about our Online Services or other services or offer sweepstakes or other promotions. If you choose to provide us with your comments, suggestions or feedback, or participate in our sweepstakes or promotions, we will use the personal information you provide to improve our Online Services and other services and administer the sweepstakes or promotions.
- **Marketing:** With your consent, we may use your personal information to send you information about GWLRA and its affiliates, including information about products, services, offers and events. We may also occasionally run promotions or other campaigns. If you choose to participate, we will collect and use your personal information to administer the promotion or campaign.

In addition to the uses described above, we may also use the personal information we collect for the purposes described in our Privacy Guidelines.

Personal Information Sharing

Our Online Services are made available to our commercial tenants and their workers. We may share information with our commercial tenants about how their workers are using and interacting with our 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 also exchange personal information with tenants in order to administer a user's access to, or termination from, Online Services.

Some of our Online Services may involve sharing personal information with other users. For example, as a convenience to users, we may provide a live video feed of certain public spaces to allow tenants to select an appropriate time to use the space. We may also offer community pages or features that allow users to share information with each other. You should not share any sensitive personal information through these community pages or features.

We use service providers to perform certain functions or provide or support certain Online Services on our behalf, such as software services, data hosting and processing, analytics, payment processing, technical and customer support and similar services. These service providers will access, store and process personal information as necessary to perform these services on our behalf.

We may also share anonymized or aggregated data with third parties, including our service providers and affiliates.

In addition to the above, we may also share your personal information as described in our Privacy Guidelines.

E-mail security

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.

Information Collected Automatically

We use cookies and other technologies, such as web beacons, to collect information automatically when you use our Online Services. "Cookies" are small items of data that websites store in your browser. These data files contain information the website can use to track and organize the pages you have visited, remember your preferences and settings, and to gather information. Some of our web-based applications use "cookie" technology to measure website activity and tailor information to fit your personal interests. GWLRA uses both "session" and "persistent" cookies, both of which help us deliver a superior website experience that is designed to be fast, secure and personalized. You may decline cookies by configuring your web browser accordingly, this may lead to reduced website functionality. Web beacons are also referred to as "pixel tags." They are embedded in a web page and are not usually visible to you. Web beacons are used for many of the same purposes as cookies. They allow us or agents acting on our behalf to gather aggregate statistics about website usage patterns, including how many times a link or a page on a website is visited.

The type of data being collected

GWLRA and our service providers gather data through the use of 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 (like Google, Facebook, LinkedIn and Twitter) 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.

How to opt out of targeted advertising

You can choose not to allow your information to be used for targeted advertising by turning off personalized ads in the settings of Facebook, LinkedIn, or Twitter, turning off cookies, opting out of ads (Canadian users can also opt out of targeted advertising through the [Digital Advertising Alliance of Canada's website](#), "going incognito" or engaging private browsing on your web browser.

How to Block Cookies

You can change your browser settings to block cookies from being stored on your computer or mobile device. The 'help' menu of your browser should provide information on how to manage your cookie settings.

To block cookies when using the browsers on your mobile device, refer to the procedure for turning cookies on or off in the Chrome and Safari apps. Please be aware, however, that blocking cookies may prevent some pages on our website or some parts of our application from displaying correctly, and some features may not be available.

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.

PRIVACY GUIDELINES

GWL Realty Advisors Inc. (“GWLRA”, “we”, “us” or “our”) follows the key privacy principles below when collecting, using, or disclosing your personal information. For the purposes of these guidelines, “personal information” means information about an identifiable individual.

These privacy guidelines, as well as our other public policies and procedures, are always available to you. These guidelines may be changed or updated from time to time, and those changes will be reflected on our websites and are available for download. Please check back often to stay up to date with any changes we’ve made.

Accountability

At GWLRA, we are responsible for all personal information under our control. This includes any personal information that is transferred to a service provider performing services for, or on behalf of GWLRA. We have established these Privacy Guidelines to keep your personal information safe.

Who is accountable?

Our directors, officers, employees, licensed representatives, and other persons and organizations who act for, or on behalf of, GWLRA are responsible for the protection of your personal information.

Personal information is maintained on our servers or those of our service providers and is accessible by authorized employees, representatives and agents who require access for the purposes described in this Privacy Statement.

The Privacy Officer, GWLRA, monitors compliance with these Privacy Guidelines.

We require our service providers to protect your personal information appropriately in a way that is consistent with our Privacy Guidelines and in accordance with applicable laws.

Service providers may only collect, use or disclose your personal information in accordance with the authorized purpose.

Personal information may be subject to disclosure to law enforcement officials and other authorities where permitted or required by law, both inside and outside of Canada.

Identifying Purposes

We identify the purposes for collecting personal information before, or at the time the information is collected.

Consent

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).

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 below.

Where previously provided, you may withdraw your consent to use your SIN for identification and record keeping purposes.

Limiting Collection

We only collect personal information that is necessary for the purposes identified.

Personal information we collect about you

Personal information we collect about you may include:

- Identification information, such as name, residential or business address, telephone number and e-mail address, vehicle information, or other identifying information;
- Workplace information, such as employer name and place of employment;
- 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;
- Information we collect at events including photographs and videos.

In addition, we may collect other information as described to you at the time of collection or through a separate privacy notice (for example, our Online Privacy Statement).

How we collect your personal information

The personal information we collect is obtained directly from you or your authorized representative, or indirectly, for example, from your employer or through our systems and tools. We may also collect your personal information from credit agencies, employers or personal references, or other third parties who represent that they have the right to disclose the information. In addition, when you visit our Online Services, we may obtain certain information by automated means. We gather data when you interact with our websites, apps and other Online Services as indicated in our Online Privacy Statement.

Examples of how we may use your personal information

GWLRA collects personal information to manage properties on behalf of landlords and property owners. In particular, personal information that we collect may be used to:

- Provide you with GWLRA services and products
- Conduct “know your client” and related screenings in connection with an application for commercial tenancy
- Process payments
- Respond to your questions, comments, inquiries or requests for information
- Send you communications which you have opted-in to receive
- Administer and enforce the commercial tenancy agreement and any related agreements
- Accommodate special needs, e.g. during emergency evacuation
- Enforce our agreements with you, such as parking agreements or amenity memberships
- Create, maintain or administer your account for Online Services
- Tailor your experience on the Online Services
- Help diagnose technical problems with the Online Services
- Administer the Online Services
- Perform data management and analytics
- Meet legal or regulatory requirements
- Video surveillance, access cards and other information for general security purposes including prevention of potentially prohibited or illegal activities
- Emergency or incident reporting including video, other surveillance for investigation, insurance and other risk management
- Employment purposes, including using resumes, and personal references provided in applications of employment and employment forms
- Statistical analysis
- Enforce website terms of use
- Market and promote our buildings, amenities, services and business generally
- Communicate with you and administer your participation in surveys, sweepstakes, events, programs, and promotions
- To protect our interests in a civil proceeding or a proceeding involving criminal activity, fraud, or misrepresentation
- To evaluate, complete or administer a purchase, sale, reorganization or financing of all or a part of our business or assets.

We may use personal information for other purposes identified to you at the time of collection, or in a separate privacy notice (for example, our Online Privacy Statement). We may collect your Social Insurance Number (SIN) where required by law for tax-reporting purposes.

In addition, where you provide consent, we may also use your SIN for identification and record-keeping, such as keeping your information separate from other customers and people with similar names. Where you have consented to use of SIN for identification and record-keeping purposes, you can withdraw this consent at any time.

Disclosure and Retention

We will keep personal information only as long as necessary to fulfill the identified purpose and in accordance with our policies and applicable laws.

We may share your personal information with other companies or individuals for the purposes described below or otherwise at the time of collection.

- Credit reporting agencies for the purposes of assessing your application for tenancy;
- Financial institutions and payment processors for the purposes of processing payments;
- Law enforcement agencies or governmental agencies as required or permitted by law;
- Our subsidiaries and affiliates to fulfill their roles as service providers and/or property owners;
- Owner of a GWLRA managed property and/or Landlord for the purposes of managing the commercial tenancy, and providing statistical analysis and reporting;
- Third party operators of amenities or facilities in or otherwise associated with the buildings we manage for purposes relating to the management and operation of such amenities or facilities;
- Prospective lenders, purchasers and their agents, provided that purchasers have entered into a confidentiality agreement;
- Other third parties with your consent.

We may work with service providers outside of Canada. In those cases, your personal information will be subject to the laws that apply in those countries, including public authorities access laws.

We may use or disclose your personal information in connection with an investigation or civil or criminal proceeding, or to detect, prevent or investigate any unlawful or unauthorized activity, including fraud or breach of an agreement.

In addition, we may disclose your information, including personal information, if we sell or transfer all or a portion of our business or assets. For example, in the event of a corporate reorganization, merger or amalgamation with another entity, dissolution or liquidation. Your information may also be transferred to a successor property manager designated by the landlord or owner of your building.

We may also disclose your personal information for additional purposes that may be identified at or before the time that the information is collected or disclosed, in accordance with a specific privacy notice (for example, our Online Privacy Statement) or for new purposes to which you have consented. We may disclose personal information where required by law.

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. Security cameras are placed exclusively in common areas of the property. When a crime occurs, we use and share the video with police to assist them in the ensuing investigation and may also share the video with a commercial tenant. In some buildings, workers may be able to access certain surveillance cameras through mobile applications or other digital tools.

Any questions regarding video surveillance should be directed to the Privacy Officer, GWLRA using the contact information provided at the end of this Statement.

Accuracy

We recognize the importance of ensuring that your personal information is accurate and up to date.

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

Safeguards

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

How we protect your personal information

All of our employees receive annual information security, privacy, and Code of Conduct training.

We have security standards to protect our systems against unauthorized access and use. 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.

Openness

This Privacy Guideline, as well as other policies and procedures, are always available to you. Please contact us if you are unable to access our website or require documents in another format.

Upon written request, we will respond to inquiries about our practices relating to the management of personal information. You can contact the Privacy Officer, GWLRA with any inquiries or complaints.

Individual Access, Correction and Deletion

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. You may also request that we correct your personal information. Where we find that the personal information is indeed incorrect, we will update it. In certain circumstances, you may also have the right to request that your personal information be deleted.

To protect your personal information, all requests for access, correction or deletion must be made to us in writing using the below contact information.

Have any Concerns, Inquiries or Requests?

Email or write to our Privacy Officer, GWLRA, about any privacy concern, inquiry, or request.

Privacy Officer
GWL Realty Advisors Inc.
Suite 1000, 33 Yonge Street | Toronto, Ontario, Canada | M5E 1G4
gwlra_privacy@gwlra.com

SOCIAL MEDIA GUIDELINE

GWL Realty Advisors Inc. (“GWLRA”, “we”, “us” or “our”) is active online with social media and invites you to share your comments and thoughts through our platforms.

At GWLRA, we are committed to respecting your privacy. The providers of social media platforms used by GWLRA are not affiliated with our organization. As such, we recommend that you use care when sharing personal information on these platforms. Personal information you share with us in private messages over our social media platforms may be shared with our employees, representatives and third party service providers. These third party service providers may be responsible for handling our social media accounts, including responding to any of the questions or issues you raise. As these individuals and service providers may in some cases be located outside of Canada, the personal information you share could be subject to access under the laws of such foreign jurisdictions.

Content that you post on our public social media platforms is not private and may be seen by anyone who visits our platform. When you share information in public comments or posts, you acknowledge and agree that it is not confidential.

No personal information should be posted on our social media platforms. GWLRA also discourages sending personal information through private messages to our social media.

GWLRA reserves the right to remove or cause to be removed posts or comments that constitute or include:

- Sensitive personal information about you or someone else
- Personal attacks, or defamatory, abusive, or hateful comments
- Links to any content containing a virus
- Spam, advertising, soliciting or links to external sites not previously approved by GWLRA
- Content that, to our knowledge, violates the intellectual property rights of another
- Language, topics, photos, videos or other images that may offend other members of the community including content that is discriminatory, offensive, crude, harassing, abusive, defamatory or threatening, or that contains profanity (even in short or abbreviated form) or discussion of illegal activities.

GWLRA reserves the right to add to, remove, or change any of the terms of this Social Media Guideline at any time.

Confidentiality and privacy are important. If you are a GWLRA client, or a tenant, worker or visitor in our buildings, and have specific questions about your account, lease, tenancy, or about the services we provide, to protect your privacy, we cannot answer them on social media. We'll ask that you send your information to us by email or another means so we can direct your question to the appropriate GWLRA representative so they can communicate with you directly.

If you are you a GWLRA employee, or contracted by or associated with GWLRA, when participating on social media, please be open about your employment or association with GWLRA and be clear that you're expressing your own views and not the views of GWLRA.

We do not endorse, nor are we responsible for the accuracy of the information, opinions, claims or advice shared by other social media users. Please use your own careful judgment when relying on the information or advice contained in these postings.

GWLRA is not affiliated with Twitter, LinkedIn, Instagram, and we're not responsible for the terms of use or their privacy or security policies, or advertisements or other material placed by Twitter, LinkedIn, Instagram on our social media pages. We don't endorse these advertisements or materials or any of the content, products, advice, opinions, recommendations, or other materials presented by Twitter, LinkedIn, Instagram, or other third parties through the site.

If you have questions or concerns about GWLRA services or products, you can find our contact information on our website <https://www.gwlrealtyadvisors.com/contact-us/>

For more information about GWLRA's Privacy Practices, please view our Privacy Guidelines and Online Privacy Statement [here](#) or write to us using the below contact information:

Privacy Officer
GWL Realty Advisors Inc.
Suite 1000, 33 Yonge Street | Toronto, Ontario, Canada | M5E 1G4
gwlra_privacy@gwlra.com

PROTECTING YOUR PRIVACY OUTSIDE OF CANADA

Service providers inside and outside of Canada

GWL Realty Advisors, Inc. (“GWLRA”, “we”, “us” or “our”) is a Canadian company and as such, most of our business activities take place within Canada. However, in order to give a high level of cost-effective service to our customers, we may ask service providers to assist us. We take great care in the selection of service providers because of our commitment to a consistent high level of service and quality.

Some service providers may be based outside of Canada, or use systems, data support or employees located outside of Canada including in the United States or India.

Service providers that we may use include:

- Smart building technology service providers
- Call centre providers
- Property technology service providers
- Mobile application and website developers and providers
- Payment processors
- Property and asset management software providers
- Tenant and resident services providers
- Property operations services providers
- Financial operations services providers

In day-to-day business, personal information about you may be collected from outside of Canada, or communicated outside of Canada, so that we or our authorized service providers can:

- Administer your application or tenancy
- Provide you with various services related to your tenancy with us (e.g. enhanced customer experience, building operations)
- Provide Online Services
- Process payments
- Communicate with you regarding your questions or inquiries about our services

The protection of personal information by service providers

We require that our service providers protect your personal information properly in a manner consistent with our Privacy Guidelines and in accordance with law in their jurisdiction.

We require that service providers collect, use or share your personal information only for purposes that we have authorized.

Personal information may always be shared with law enforcement and other authorities where permitted or required by law, both inside and outside of Canada.

Any concern, question or request related to the collection and communication of personal information outside of Canada should be made in writing. For more information, contact the Privacy Officer, GWLRA, using the below contact information:

Privacy Officer
GWL Realty Advisors Inc.
Suite 1000, 33 Yonge Street | Toronto, Ontario, Canada | M5E 1G4
gwlra_privacy@gwlra.com