

**Privacy Policy for the Collection, Use, Disclosure and Security of
Personal Information for Condominiums**

ICC Property Management Ltd.

Introduction

ICC Property Management Ltd. (hereinafter called “the Manager”) is a Corporation created under the laws of Ontario for the purpose of carrying on business as a property management firm administering and managing multi-residential, industrial and commercial condominiums and providing services to its residents.

In the process of operating and managing multi-residential condominium corporations, the Manager collects certain personal information from unit owners, tenants and employees (hereinafter called “Individuals”) and may employ or contract third party services from a variety of individuals, companies and professionals who may need access to this personal information.

Personal Information means information that is personally identifiable to Individuals. This may include, without limitation, addresses, telephone numbers, email addresses, bank account numbers, payment histories, information about his or her family, seasonal address, emergency contact names and any special needs.

This Privacy Policy is based on, and complies with, Canada’s Personal Information Protection and Electronic Documents Act (“PIPEDA”). It sets out principles that the Manager follows to ensure that it protects Individual’s personal information when it collects, uses or discloses it in the course of carrying on its activities. All of the Manager’s Employees, Contracted Employees and its Directors who have access to personal information must adhere to this Policy and related procedures.

The Manager shall use this policy and the guidelines of Section 55 of the Condominium Act, 1998 in its handling of the collection, use and disclosure of information.

No part of this policy shall contravene any part of the Condominium Act, 1998.

Collection

The Manager shall collect information necessary to maintain an accurate Owners Register as required by the Condominium Act, 1998. The Manager shall only collect information that is reasonably necessary for the purposes identified. The information will be collected by fair and lawful means.

Information that is typically collected includes, but is not limited to the following:

- Name
- Address – Current and Seasonal
- Telephone Numbers
- E-mail Address
- Name of Mortgagee on the unit
- Financial Institution and Bank Account Number
- Tenant Names
- Persons residing in unit

- Emergency Contact and Contact Information
- Vehicle Information including License Plate Numbers
- Special Needs of Owners

In addition, information other than as set out above may also be collected from time to time including, but not limited to:

- Video surveillance cameras are located throughout the building for security purposes and to record pedestrian and vehicular access to and within the property;
- Registration of visitors, including name, time of entry, license plate number and unit being visited;
- Computerized registration of access cards or fobs recording access point, time of use and registered user of access device;
- Listing of residents who would require special assistance during a fire emergency and;
- Other similar lists related to security, pre-authorized access to the building by relatives, guests or service individuals.

Use and Disclosure

The Manager shall not authorize the use of personal information for purposes other than those in keeping with the effective operation and management of the Condominium Corporation without the written consent of the individual.

The Manager periodically shares or transfers any personal information collected with its Clients (Board Members). The Manager also uses a number of employees, third party service providers, consultants and other agents that may in the course of their duties have limited access to personal information retained. These include building superintendents, maintenance staff, concierge, security staff, housekeeping staff, consultants, temporary employees or employees of third party suppliers, auditors, lawyers and others. We restrict their access to any personal information we hold except to the extent necessary for them to reasonably perform their role on the Owner's behalf. The purpose of disclosing personal information to these parties is to ensure an Individual's safety, security and reasonable enjoyment of their place of residence, to ensure Individual's have access to their premises and services that the Manager provides, to preserve the property and to collect monies owing for the provision of services to Individuals.

Personal information will only be used or disclosed for the purpose for which it was collected unless an Individual has otherwise consented, or when it is required or permitted by law. In certain exceptional circumstances, the Manager may have a legal duty or right to disclose personal information without an Individual's knowledge or consent with respect to matters that concern the public's interest or in complying with the Condominium Act, 1998 or a court order.

The Manager shall not disclose matters of a financial nature concerning its relationship with any owner or resident with any person except the registered unit owner named in the Manager's Owner Registry, unless the Manager has received written authorization from the owner or resident authorizing the disclosure of such information to an individual named in writing, or in the event that the Manager is presented with a Power of Attorney signed by the registered unit owner.

The Manager may also disclose information without the Owners' consent when permitted by law including in situations involving medical emergencies, collection of debt and suspicion of illegal activities.

The Manager shall release information of a financial nature regarding their relationship with an owner as necessary in the preparation and distribution of a Status Certificate required by the Condominium Act, 1998.

The Manager shall allow an owner access to their information within a reasonable time upon receipt of a written request to view the information.

Accuracy & Security

The Manager will keep all personal information as accurately and as current as necessary to fulfill the identified purposes for which it was collected. The Manager will update or correct any personal information held by it if the individual concerned provides the Manager with particulars of any information which requires updating or correction.

The Manager acknowledges the responsibility of safely maintaining accurate records for the purpose of operating the Condominium Corporations. All information kept in the on-site management offices will be stored out of site of visitors or guests to the on-site management offices.

Personal information is safeguarded to protect against loss, theft or unauthorized access, disclosure, use or modification of information using physical, organizational and electronic security measures.

Accountability

A copy of this policy and Section 55 of the Condominium Act, 1998 shall be kept available in the offices of the Manager and will be made available for review upon request.

Owners or residents may address specific concerns regarding the use or distribution of personal information to their on-site Property Manager.

The Manager will ensure that their employees strictly comply with the Policy.

Questions or Concerns

The Manager has policies and procedures to receive, investigate and respond to any questions or concerns respecting this Privacy Policy or the personal information that is held. Individuals may contact the Manager's Privacy Officer with any questions or concerns or to request access to their personal information.

Privacy Officer

The Privacy Office of the Manager is Mr. Steven Christodoulou, c/o ICC Property Management Ltd., 1550 16th Avenue, Building B, Suite 200, Richmond Hill, Ontario L4B 3K9.