

WPJ McCarthy and Company Ltd. Privacy Policy

W.P.J. McCarthy and Company Ltd. (“**WPJ McCarthy**” and the words “**we**” or “**us**” when used in this Privacy Policy refer to W.P.J. McCarthy and Company Ltd. and, where applicable, any service providers collecting, using or disclosing personal information on behalf of W.P.J. McCarthy and Company Ltd.) recognizes the importance of protecting personal information. WPJ McCarthy takes the protection of personal information seriously and we want each tenant and client of WPJ McCarthy (referred to in this Privacy Policy as a “**client**” or “**you**”) to feel comfortable when interacting with WPJ McCarthy or using its services. Any personal information collected by WPJ McCarthy will be treated with care and with consideration to existing laws related to protecting your privacy. This Privacy Policy provides information on how we collect, store, use and disclose any personal information provided to us during your tenure as a client of WPJ McCarthy.

WPJ McCarthy has developed this Privacy Policy in compliance with British Columbia’s *Personal Information Protection Act*, S.B.C. 2003, c. 63 (“**PIPA**”) and the federal statute, the *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5 (“**PIPEDA**”). We will inform our clients of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

CONSENT

We may collect personal information directly from you in writing or by phone, fax, e-mail or other methods. When you provide us with your personal information, you consent and agree to our use and disclosure of your personal information in accordance with this Privacy Policy. The personal information that we collect about you will be with your consent, by your use of any website or services of WPJ McCarthy. To the extent permitted by law, your consent may be implied or express. Consent may be implied where you are given notice, and a reasonable opportunity to opt out of your personal information being used for the marketing of new services or products, and you do not opt out.

When you request services from us, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such personal information for the purposes set out above. You also authorize us to use and retain this personal information for as long as it may be required for these purposes. Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn. You may choose not to provide some or all of your personal information to us, but this may prevent us from providing our services to you or limit our ability to provide you with the level of service that you would otherwise expect from us as a client.

WPJ McCarthy’s website may be connected by “hyperlinks” to other websites. WPJ McCarthy is not responsible in any way for the privacy practices on other websites and suggests that you review the privacy policies on those linked websites before using them.

PERSONAL INFORMATION GENERALLY DEFINED

“Personal information” means any information pertaining to an identifiable individual. This may include an individual’s name in combination with the individual’s address, date of birth, e-mail address, gender, government issued identification number, account number, and credit card number. This may also include any information from which a person can be identified directly, or indirectly, in particular by reference to an

identification number or to one or more factors specific to their physical, physiological, mental, economic, cultural or social identity. To the extent permitted by law, personal information does not include (i) information pertaining to an organization as distinct from an individual person, (ii) the name, title, business address or office telephone number of an employee of an organization, or (iii) the name, address, telephone number or other information of a person that is publicly available (e.g. such as the information that is available in a public telephone directory).

USE OF PERSONAL INFORMATION

Collecting personal information about you is essential to our being able to provide the services that best meet the needs of you and our other clients. WPJ McCarthy may collect personal information, as defined in this Privacy Policy, for the purposes of the provision of WPJ McCarthy's services and your use of same, the identification of client preferences, and maintenance of quality of service. Any information collected may also be stored, retained or used in other WPJ McCarthy business processes including, but not limited to, client account-management and payment authorization. Any personal information collected but not stored or maintained in the regular course of business will be securely destroyed.

We will only use or disclose client personal information where necessary to fulfill the purposes identified at the time of collection, the purposes set out in this Privacy Policy, or for a purpose reasonably related to those purposes. Personal information may be used:

- to determine eligibility for products and services;
- to provide requested information, products or services;
- to understand and assess clients' ongoing needs and offer products and services to meet those needs;
- for billing and accounting services relating to our products and services;
- for client communication, service and administration;
- for internal, external and regulatory audit purposes;
- to comply with legal and regulatory requirements;
- to share or exchange reports and information with credit reporting agencies, credit bureaus, and other persons, corporations, firms, and enterprises to verify the accuracy of personal information;
- for other purposes, subject to obtaining clients' prior consent for such use.

COLLECTION OF PERSONAL INFORMATION

When you request services from us, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such personal information for the purposes set out in this Privacy Policy. You also authorize us to use and retain this personal information for as long as it may be required for these purposes. Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn. Some information about you is automatically collected, including, but not limited to, your IP address (please see "USE OF WEBSITE AND TRACKING" below).

We may collect, use or disclose personal information without a client's knowledge or consent in the following limited circumstances:

- when the collection, use or disclosure of personal information is permitted or required by law;
- in an emergency that threatens an individual's life, health, or personal security;

- when the personal information is available from a public source (e.g. a telephone directory);
- when we require legal advice from a lawyer;
- for the purposes of collecting a debt;
- to protect ourselves from fraud; or
- to investigate an anticipated breach of an agreement or a contravention of law.

While the personal information we collect may come directly from you, it may also be provided by third parties.

SHARING OF PERSONAL INFORMATION WITH AFFILIATES AND THIRD PARTIES

By utilizing WPJ McCarthy's services, you agree that WPJ McCarthy may share personal information with its affiliates and with third parties acting on its behalf or at its direction for purposes relating to WPJ McCarthy's operations, maintenance, administration, improvement and client oversight. WPJ McCarthy does not disclose or sell your personal information to third parties for marketing purposes.

Disclosure of personal information may occur in connection with a corporate transaction, proceeding or reorganization of WPJ McCarthy's business for or by which the information is maintained. More specifically, in the event that WPJ McCarthy intends to sell or transfer ownership or control of any or all of our business, products, operations or services to a third party, we reserve the right to disclose certain personal information to a potential buyer both before and after the purchase, subject to conditions discussed below. However, in the event the sale goes through, we will require that the receiving party agree that they will be similarly bound by the provisions of this Privacy Policy or a comparable policy and that they will only use and disclose your personal information in accordance with applicable law. In the event the sale does not go through, WPJ McCarthy will require the potential purchaser to not use or disclose your personal information in any manner whatsoever and to erase the same. Personal information may also be disclosed as permitted or required by law or when WPJ McCarthy believes disclosure is necessary to protect its rights and/or comply with a judicial proceeding, court order or other applicable law.

Without limiting the foregoing, by utilizing the products or services of WPJ McCarthy, you agree that WPJ McCarthy may disclose your personal information to:

- your company or organization if you use our services under a corporate account;
- your credit card issuers;
- credit reporting and fraud checking agencies;
- debt collection agencies, if you fail to pay monies owed to us;
- government, regulatory and law enforcement agencies where the disclosure is required or authorized by law; and
- insurance companies.

SECURITY AND NOTICE OF BREACH

WPJ McCarthy complies with industry standards to protect the personal information it maintains from misuse, loss, unauthorized access and modification or disclosure in violation of this Privacy Policy. Security measures have been integrated into our design, implementation and day-to-day operating practices as part of WPJ McCarthy's continuing commitment to the protection of personal information held by it. We employ physical, electronic and procedural safeguards to protect our systems and all personal information under our control against unauthorized access and use. All safety and security measures are appropriate to the sensitivity level of the information collected. This protection applies in relation to personal information

stored in both electronic and hard copy form.

We use appropriate security measures when destroying a client's personal information. We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

WPJ McCarthy will notify its clients as promptly as possible of any privacy breach after discovering or receiving notification of the breach if WPJ McCarthy reasonably believes the information has been acquired by an unauthorized person or is subject to an unauthorized use.

ACCESS TO PERSONAL INFORMATION

Upon request, you may access certain personal information collected by WPJ McCarthy that WPJ McCarthy maintains at the time of your request. WPJ McCarthy will provide reasonable and practical access to your personal information in accordance with any applicable laws. Details of how to contact us are set out below. There may be instances where WPJ McCarthy cannot provide you access to your personal information, for certain reasons, including, but not limited to, it has been destroyed or deleted after expiry of applicable retention periods, it contains personal information of other persons, or it contains commercially sensitive or proprietary information owned by us. If we are unable to provide you access, we will explain why and document that for our records. A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform you of the cost and request further direction from you on whether or not we should proceed with the request.

ACCURACY / CORRECTION OF PERSONAL INFORMATION

We rely on you to keep us informed of any changes in your contact information or personal information, such as a change of address, telephone number, or any other circumstances. Please contact one of our customer service representatives or our Privacy Officer, to verify or amend the information we have about you. When reasonable and commercially practicable, WPJ McCarthy, upon notice, will correct any inaccuracies in your personal information.

USE OF WEBSITE AND TRACKING

Use of Internet Protocol (IP) Addresses: An IP address is a unique number that is automatically assigned to your computer, smart-phone or other device whenever you are surfing the Internet so that your computer, smart-phone or device can be identified by the main computers, known as Web servers, that serve webpages. This allows us to identify and gather general information about your use of WPJ McCarthy's products and services.

Some information about you is automatically collected when you use our websites including, but not limited to, your IP address, hosting server, browser, operating system, browser language, service provider, domain names, access times and referring website addresses. This information may be used by WPJ McCarthy for the operation of its website, to maintain quality of the website, and to provide general statistics regarding use. WPJ McCarthy's apps, if any, collect IP addresses for the purposes of helping us diagnose problems with our main computers and for system administration. We do not normally link IP addresses to anything personally identifiable, which means that a user's session will be logged, but the user will remain anonymous to us. However, we can, and will, use IP addresses to identify you when we feel it is necessary to enforce compliance with our website terms of use or to protect our services, products, clients, users, or others.

WPJ McCarthy's website, products or services, may use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by the webpage server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. This simplifies the process of recording your personal information, such as contact information and so on. You have the ability 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. If you choose to decline cookies, you may not be able to fully experience the interactive features of WPJ McCarthy's website, products or services.

CHANGES TO PRIVACY POLICY

WPJ McCarthy reserves the right to change this Privacy Policy from time to time. We encourage you to periodically review this Privacy Policy to be informed of how WPJ McCarthy is protecting your information. Regardless of any changes we make to our Privacy Policy, we will only use your personal information in accordance with the version of the Privacy Policy in place at the time you provided your information, unless you later give your express consent for us to do otherwise.

QUESTIONS/COMPLAINTS

WPJ McCarthy has designated individuals to act as Privacy Officers, responsible for ensuring compliance with this Policy, the PIPA and the PIPEDA. Questions and complaints regarding WPJ McCarthy's handling of personal information should be directed to W.P.J. McCarthy and Company Ltd. at Suite #700 – 4980 Kingsway, Burnaby, BC V5H 4K7, Canada – *Attention Privacy Officer*.

This Privacy Policy is effective July 18, 2018.