

RIO  CAN

Privacy Policy

Effective as of August 15, 2018

Table of Contents

Policy Overview.....	3
What is Personal Information?	3
Who is responsible for administering our Privacy Policy?.....	3
Why do we collect, use and disclose your personal information?.....	3
How do you give or withdraw consent to our handling of your personal information? ...	4
How much personal information do we collect, use or disclose?	5
How long do we retain your personal information?	5
How do we protect your personal information?	5
How can you access and correct personal information we have about you?.....	5
Questions about our personal information practices?.....	6

Policy Overview

At RioCan Real Estate Investment Trust (“RioCan”), the privacy of your personal information has always been and will continue to be an important aspect of the way we operate. We have developed this Privacy Policy to advise you of our continuing commitment to the protection of your personal information.

What is Personal Information?

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- name, age, ID numbers, e-mail address, postal address, or phone number;
- opinions, evaluations, comments, employee applications or personnel files; and
- product, service, residential or business applications, invoices, income, credit or loan records, product or service usage information, or information relating to a dispute with an individual.

Who is responsible for administering our Privacy Policy?

Our Chief Privacy Officer, along with managers in each functional area/department, is responsible for ensuring compliance with applicable privacy legislation and with this Privacy Policy.

Why do we collect, use and disclose your personal information?

As a real estate company, we interact with and provide a variety of services to employees, tenants, customers, suppliers, business partners and unitholders. In order to provide the services offered by RioCan, we may collect, use and disclose personal information, when applicable, for the following purposes:

- processing of employment documentation;
- executing payroll and benefit related functions;
- complying with legal obligations including, but not limited to, employment standards, health and safety, workers compensation and taxation;
- processing of payments to/from tenants, suppliers and vendors;
- provision of investor relations services to our unitholders;
- administration of marketing/public relations initiatives;
- provision of property management services as outlined in our leases and related documentation;
- analyzing the services we and our service providers, suppliers and partners provide and assessing our employees’, tenants’ and customers’ satisfaction with those services to develop and improve our business;
- in connection with the potential sale or sale of all or parts of RioCan’s business
- accessing property-site internet through Wi-Fi connection; and
- internal or external audits of our processes and policies.

Third Party Affiliates:

RioCan may also collect your personal information from third-parties, including from financial institutions or credit agencies, and will do so with your express consent where required by law. Moreover, RioCan may disclose your personal information to third-party affiliates (ex. payroll and benefits providers, utility service providers, business partners, etc.) who are legally obligated to keep such information private. RioCan's third-party affiliates may be located in foreign jurisdictions, whereby they are subject to the laws of the jurisdiction in which they operate including laws regulating the collection, use and disclosure of personal information.

Advertising:

RioCan websites collect information (ex. cookies) to enhance a user's online experience. RioCan uses third-party advertising partners (ex. Google, Trade Desk, and Facebook) to provide online visitors with relevant advertisements. Cookies can be disabled by a user through their own website browser. If you do not wish to receive such advertisements, you can opt-out at the Digital Advertisement Alliance of Canada.

Social Media:

RioCan maintains accounts on several social media websites, including but not limited to, Facebook, Twitter, Instagram, Pinterest and LinkedIn. Social Media Accounts are intended to be used solely for business purposes including building a positive brand image, providing customers with more timely and personal service, monitoring public opinion on RioCan, or increasing customer retention. Users who interact with RioCan social media accounts should be aware of the third-party provider's terms of service and privacy policies. Personal information provided by users to RioCan through social media websites may be collected and used for marketing and reporting purposes.

This is not a comprehensive list of the purposes for which we collect personal information. It is an overview of the activities that our different departments engage in when they collect, use or disclose your personal information and the reasons why they do so. RioCan will collect, use and disclose your personal information only to the extent required to fulfill the purposes for which we require your personal information.

How do you give or withdraw consent to our handling of your personal information?

You may consent to the collection, use and disclosure of your personal information either expressly or impliedly.

Express consent – You may provide us with your express consent to our collection, use and disclosure of your personal information for the purposes we identify for you by communicating your consent in a straightforward, clear and explicit manner, either orally or in writing (in paper or electronic form).

Implied consent – You may also provide us with your implied consent by way of your action or inaction. For example, by providing us with your resume or other documentation, you are impliedly consenting to our review of the personal information on that documentation.

There may be instances where the law permits the collection, use or disclosure of your personal information without your consent, for example, for debt collection, fraud investigations, and where necessary to protect our property and legal interests or the safety of others. In addition, some information such as business contact information or publicly available information can be collected, used and disclosed for limited and lawful purposes without your consent.

Withdrawing consent - You may withdraw your consent to any of our uses of your personal information by giving our Chief Privacy Officer reasonable prior written notice. Should you choose to withhold or withdraw consent to a general or particular use of your personal information, you may provide us with either a verbal or written statement to this effect for our records and so that we may ensure that we do not use your personal information in this manner. Choosing to do so may affect our ability to provide you with certain products or services.

How much personal information do we collect, use or disclose?

We collect, use and disclose your personal information only to the extent required to fulfill the purposes for which we require your personal information.

How long do we retain your personal information?

We retain your personal information only for as long as is required to fulfill the purposes for which we collected it, and to meet all of our legal and regulatory requirements.

Legislative requirements may vary between provinces with respect to the information we must keep on file, however, personal information that is retained is done so in a secure, confidential manner.

How do we protect your personal information?

We know that you expect us to protect your personal information from risks of loss, theft, unauthorized access, misuse and corruption. We continue to evolve and enhance our information security practices as reliance on digital technologies to conduct business continues to grow. While security and privacy risks can never be eliminated entirely, we take reasonable steps to safeguard your personal information against such risks.

Methods we use to protect your personal information include, but are not limited to, passwords to protect databases, firewalls in the computer system, restricted access to offices and locked filing cabinets. All personal information is kept secure from alteration, either intentional or accidental. Destruction of personal information in paper and electronic form is performed in a secure manner. Access to your personal information is restricted to those of our employees who need to know the information to fulfill the purposes for which we collected it.

We provide appropriate training to employees on their obligations when handling personal information.

We also ask you to help us protect your information. When using communication methods (e.g. email), please minimize the amount of personal information you send to us. If you need to send us sensitive information, please contact us first to determine the most secure way to do so.

How can you access and correct personal information we have about you?

You have a right to access personal information we have about you and to know how we have used it, subject to certain legal exceptions. To submit a request to access your personal information, please contact our Chief Privacy Officer.

If you require assistance in preparing your request, please contact us and we would be pleased to assist you.

We rely on our personal information sources for the accuracy of the information they provide, and we do our best to ensure that the personal information we use on an ongoing basis is accurate, complete and up-to-date. Should you find that the personal information we have about you is out of date or inaccurate, please contact our Chief Privacy Officer.

Questions about our personal information practices?

If you have any questions, concerns, comments or suggestions regarding our Privacy Policy and our personal information practices, please contact our Chief Privacy Officer in writing or via email:

Chief Privacy Officer

RioCan Real Estate Investment Trust
RioCan Yonge Eglinton Centre
2300 Yonge St, Suite 500
Box 2386
Toronto, Ontario
M4P 1E4

Email: privinfo@riocan.com

If our Chief Privacy Officer is unable to resolve your concern or question, you may contact the Office of the Privacy Commissioner of Canada:

Address: 30 Victoria Street, Gatineau, Quebec, K1A 1H3

Telephone: (819) 994-5444

Toll-free: 1-800-282-1376