

**R I O  C A N**

**Privacy Policy**

**Effective as of September 27, 2019**

**TABLE OF CONTENTS**

OVERVIEW ..... 1

WHAT IS PERSONAL INFORMATION ..... 1

ACCOUNTABILITY FOR YOUR PRIVACY ..... 2

COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION ..... 3

CONSENT ..... 4

RETENTION OF PERSONAL INFORMATION ..... 4

SAFEGUARDING PERSONAL INFORMATION ..... 5

ACCESSING AND CORRECTING YOUR INFORMATION ..... 6

OUR WEBSITE PRACTICES ..... 7

EXTERNAL LINKS AND SOCIAL MEDIA ..... 7

PRIVACY COMPLAINT AND BREACH MANAGEMENT PROCESS ..... 8

CHANGES TO THIS POLICY ..... 8

CONTACT INFORMATION ..... 9

## OVERVIEW

At RioCan Real Estate Investment Trust (“RioCan”), your privacy is of great importance to us. RioCan is committed to the protection of the personal information of all individuals who interact with RioCan. We have developed this Privacy Policy (the “Policy”) to advise you of our continuing commitment to the protection of your personal information.

This Policy applies to all customers, tenants, past tenants, unitholders, website visitors and other individuals whose personal information is entrusted to RioCan in the course of commercial activity.

## WHAT IS PERSONAL INFORMATION

For the purposes of this Policy, “personal information” is any factual or subjective information, recorded or not, about an identifiable individual. Personal information includes information in any form, including:

- Name, contact information, birthdate, ID numbers and identifiable on-line activity;
- Rental applications;
- Security footage;
- Financial information such as income and information found in invoices, application forms, credit or loan records and tax filings; and
- Product or service usage information.

**ACCOUNTABILITY FOR YOUR PRIVACY**

RioCan takes full responsibility for the management and confidentiality of personal information. Personal information is collected, used, shared and stored in accordance with the *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c.5 and any applicable provincial privacy laws that may apply to RioCan from time to time. RioCan also respects the privacy best practice principles contained in the Canadian Standards Association *Model Code for the Protection of Personal Information*, CAN/CSA-Q830-96.

RioCan has appointed a Chief Privacy Officer who oversees compliance with privacy laws and best practices. The Chief Privacy Officer's duties include:

- Developing and, on a regular basis, reviewing RioCan's privacy policies and procedures to ensure their compliance with applicable privacy legislation;
- Ensuring all RioCan staff are trained on RioCan's privacy policies and procedures (including this Policy);
- Ensuring that all inquiries and complaints relating to privacy are appropriately handled; and
- Ensuring all third parties to whom RioCan provides access to personal information adhere to appropriate standards of care in managing that information.

RioCan's Chief Privacy Officer may delegate responsibilities to one or more RioCan employees to act on his or her behalf and to oversee the day-to-day management and processing of personal information.

**COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION**

Personal information can be collected by RioCan in several ways, including through product, service, residential or business application forms, as well as any other documents you provide to RioCan or that are provided to us by a third party such as a credit reporting agency. We also collect limited personal information to offer and deliver our products or services and do so with your consent (express or implied) or as otherwise authorized by law. We identify when information may be provided optionally and when it is necessary in order to service you.

Purposes for collecting, using and/or disclosing personal information include the following:

- To process your application, establish and maintain a relationship with you;
- To verify your identity or contact you;
- To assess creditworthiness, for example, by obtaining a credit report on you where appropriate and with your authorization;
- To process payments from tenants, unitholders, suppliers and vendors;
- To provide investor relations services to our unitholders;
- To provide property management and other services, such as the provision of Wi-Fi connections;
- To assess and manage risk, including detecting and preventing fraud or error;
- To collect debts owed to RioCan and enforce agreements between you and RioCan;
- To analyze the services RioCan and its service providers, suppliers and partners provide, assess customer satisfaction and enhance RioCan assets, products and services;
- To administer marketing/public relations campaigns and inform you about RioCan initiatives that may be of interest to you;
- In connection with the potential sale of all or parts of RioCan's business; and
- To meet auditing, legal and regulatory processes and requirements.

This is not a comprehensive list of the purposes for which we collect personal information. It is an overview of the activities that RioCan engages in when we collect, use or disclose personal information and the reasons why we 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 or unless otherwise required by law.

We may also share your personal information with business partners, affiliates and service providers, including financial institutions, credit agencies, lawyers, appraisers, accountants and other professionals and consultants, IT service providers, utility service providers, etc. In the event that RioCan discloses your personal information to third parties, RioCan will take reasonable steps to ensure that such third parties are reputable and have safeguards in place to protect your information. 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 relating to the collection, use and disclosure of personal information.

## CONSENT

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

Expressed Consent – You may provide us with your expressed consent to our collection, use and disclosure of your personal information for the purpose 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 documentation, you are impliedly consenting to our review of the personal information on that documentation. RioCan will imply your consent to the collection, use and disclosure of your personal information when that information is being collected, used or disclosed for the purposes identified above.

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 can be collected, used and disclosed for limited and lawful purposes without your consent.

Withdrawal of Consent – If you wish to limit the use or disclosure of specific personal information provided to RioCan, you must submit to the Chief Privacy Officer a written letter detailing such a request. The Chief Privacy Officer will then advise you as to whether the requested information can be limited in the manner requested.

## RETENTION OF PERSONAL INFORMATION

RioCan retains 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. Once your information is no longer required by RioCan to administer products or services or meet legal or regulatory requirements, it is securely destroyed, erased or made anonymous. Keep in mind, however, that residual information may remain in back-ups for a period of time after its destruction date.

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.

**SAFEGUARDING 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, RioCan has implemented critical physical, organizational and technical measures to guard against unauthorized or unlawful access to the personal information we manage and store. We have also taken steps to avoid accidental loss or destruction of, or damage to, your personal information.

RioCan protects personal information by establishing safeguards that are appropriate to the sensitivity of the information. Here are some examples of the security controls we have in place:

- Secure office premises with key card access;
- Locked filing cabinets and a secure shredding practice for paper records;
- The use of encryption and robust authentication processes, including complex passwords, for electronic records;
- Limited access to personal information by employees who have been appropriately cleared and who need the information to do their jobs;
- The use of data centers with effective physical and logical data security controls; and
- Staff that are keenly aware of their data protection responsibilities.

In addition, we recommend that you do your part in protecting yourself from unauthorized access to your personal information. RioCan is not liable for any unauthorized access to your personal information that is beyond our reasonable control.

**ACCESSING AND CORRECTING YOUR INFORMATION**

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 need assistance in preparing your request, please contact us and we would be pleased to help you. We may charge a fee to cover any expenses related to responding to your access request.

RioCan responds to access requests within 30 days, unless an extension of time is required. However, there may be contexts where access is refused, or only partial information is provided, for example, in the context of an ongoing investigation or where another individual's personal information or identity must be protected. If your access request is refused (in whole or in part), you will be advised of the reason and any recourse available.

RioCan will make reasonable efforts to keep personal information as accurate, complete and up-to-date as is necessary to fulfill the purposes for which the information is to be used. Should you find that the personal information we have about you is out of date or inaccurate, please contact our Chief Privacy Officer. Where reasonable or necessary, RioCan may transmit any amended information to third parties who have access to the information in question.

In addition, we recommend that you do your part in protecting yourself from unauthorized access to your personal information. RioCan is not liable for any unauthorized access to your personal information that is beyond our reasonable control.

## OUR WEBSITE PRACTICES

When you visit RioCan's websites, we automatically receive and record information on our server logs from your browser or mobile platform, including the date and time of your visit, your IP address, unique device identifier, browser type and other device information (such as your operating system version and mobile network provider). By setting cookies, RioCan is able to enhance a user's on-line experience (e.g. we may identify you as a return visitor in order to provide you with a more meaningful visit). You can disable cookies through your website browser.

The information we collect when you visit RioCan's websites help us analyze and improve the performance of our digital services. RioCan uses Google Analytics for web statistical analysis. We make no effort to personally identify you based on your visit to our site. If you wish, you may opt out of being tracked by Google Analytics by disabling or refusing the cookies; by disabling JavaScript within your browser; or by using the Google Analytics Opt-Out Browser Add-On.

RioCan also uses third party advertising partners (e.g. Google, Trade Desk and Facebook) to provide on-line visitors with relevant ads. You may also opt out of interest-based advertising by visiting the opt-out tool made available by the Digital Advertising Alliance of Canada at <https://youradchoices.ca/choices/>

## EXTERNAL LINKS AND SOCIAL MEDIA

We may offer links from our websites to the sites of third parties, such as affiliated or partner organizations that may be of interest to you. RioCan makes no representations as to such third parties' privacy practices and we recommend that you review their privacy policies before providing your personal information to any such third parties.

RioCan's use of social media serves as an extension of our presence on the Internet and help us build a positive brand image as well as offer our customers personalized service. RioCan maintains several social media accounts such as Facebook, Twitter, Instagram, Pinterest and LinkedIn. These are public and are not hosted on RioCan's servers. Users who choose to interact with RioCan via social media should read the terms of service and privacy policies of these services/platforms.

## PRIVACY COMPLAINT AND BREACH MANAGEMENT PROCESS

RioCan takes privacy complaints very seriously and has a procedure in place for escalating and managing any privacy related concerns to ensure that they are responded to in a timely and effective manner.

Any privacy related complaint or suspected privacy breach must be escalated to RioCan's Chief Privacy Officer who oversees the containment, investigation and/or corrective actions for the complaint or suspected breach.

You will be informed of the outcome of the investigation regarding your specific complaint. If a complaint is found to be justified, RioCan will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures.

In the event that you are not satisfied with RioCan's resolution of a complaint or suspected privacy breach, you may contact the Office of the Privacy Commissioner of Canada.

## CHANGES TO THIS POLICY

We may change this Policy from time to time in order to better reflect our current personal information handling practices. Thus, we encourage you to review this document frequently. The "Last Updated" date at the top of this Privacy Policy indicates when changes to this policy were published and came into force. Your continued use of RioCan products and services following the posting of any changes to this Privacy Policy means you accept such changes.

## CONTACT INFORMATION

***RioCan's Chief Privacy Officer***

Individuals who wish to make a formal complaint or who have questions, concerns, comments or suggestions regarding this Policy or RioCan's personal information practices may contact RioCan's Chief Privacy Officer in writing or via e-mail:

Chief Privacy Officer  
RioCan Real Estate Investment Trust  
RioCan Yonge Eglinton Centre  
2300 Yonge St., Suite 500, Box 2386  
Toronto, Ontario M4P1E4  
E-mail: [privacy@riocan.com](mailto:privacy@riocan.com)

Your concerns will receive prompt attention. Our Chief Privacy Officer can also provide you with more detailed information about RioCan's policies and practices or assist you with completing an access to information request. Keep in mind however that e-mail or text messaging are not secure forms of communication, so never send confidential personal information to us this way.

***Office of the Privacy Commissioner of Canada***

While RioCan encourages you to raise any complaints, questions or concerns with RioCan directly, you may also contact the Office of the Privacy Commissioner of Canada:

Office of the Privacy Commissioner of Canada  
30 Victoria Street  
Gatineau, Quebec K1A 1H3  
Toll-free: 1-800-282-1376  
Phone: (819) 994-5444  
Fax: (819) 994-5424 Website: <https://www.priv.gc.ca>

**Version History:**

Version	Date	Author(s)	Description
1.0	27-Sep-19	SVP, GC & Corporate Secretary	Initial Release – development of current best practices.