

## **BuyProperly Privacy Statement**

**Last update: September 9<sup>th</sup>, 2019**

At BuyProperly Limited (“**BuyProperly**”, “**we**” or “**us**”) we are committed to protecting your privacy, by complying with the laws and regulations under, and principles of, applicable privacy laws in Canada. This privacy statement (“**Privacy Statement**”) outlines the types of Personal Information that we collect, use and disclose in connection with buyproperly.ca “**Website**”) and the associated services (“**Services**”). The Website and Services are collectively referred to as the “**Site**”. It explains how BuyProperly uses and discloses that information, the choices you have regarding such use and disclosure, and how you may correct that information. By accessing or using the Site, you agree to be bound by the terms of this Privacy Statement. We may make changes to this Privacy Statement from time to time. The Privacy Statement is current as of the “last update” date which appears at the top of this page. We will treat Personal Information in a manner consistent with the Privacy Statement under which it was collected, unless we have your consent to treat it differently. This Privacy Statement applies to any information we collect or receive about you, from any source.

### **Scope of this Privacy Statement**

This Privacy Statement applies to the collection, use and disclosure of Personal Information by BuyProperly and not to other websites linked to the Site. On the Site, we may link to other websites operated by entities other than BuyProperly. We are not responsible for such websites or associated third party services, including any content or information collection policies.

### **What is classified as Personal Information and how will it be collected and used?**

“Personal Information” is any information that is identifiable with you, as an individual. This information may include but is not limited to your name, mailing address, phone number, email address, birthday, age, address, social insurance number, educational and/or employment history, banking information, investment objectives, and investment experience. Personal Information, however, does not include your name, business title or business address and business telephone number in your capacity as an employee of an organization. Personal information will be collected when you use our Site, when you create your profile, and when making an investment. We will always collect your Personal Information by fair and lawful means.

### **Where do we store your Personal Information?**

We will keep the Personal Information that we collect at the BuyProperly offices or at the offices of our third-party service providers or at data centers managed by our third-party services providers in Canada and the United States, as applicable.

### **How do we use your Personal Information?**

We identify the purposes for which we use your Personal Information at the time we collect such information from you and obtain your consent, in any case, prior to such use. We generally use your Personal Information for the following purposes (the “**Purposes**”):

- a) registering you for a user account for the Site (“**user account**”) so that we may verify your identity and your status as an eligible investor pursuant to applicable laws;
- b) maintaining your user account;
- c) providing or performing any services requested by you;
- d) providing you with information about offerings, services or promotions that may be of interest to you if you have specifically requested this information;
- e) to process any investment you make;
- f) to verify your identity, creditworthiness, and to meet regulatory requirements;
- g) to respond to your questions, comments or concerns regarding BuyProperly;
- h) to gather your opinions, comments and feedback in regard to BuyProperly’s operations;

- i) to perform demographic analysis for planning purposes, in aggregated, non-identifiable form, to better understand how our users use the resources provided on the Site;
- j) to use Google Analytics and other similar analytics service providers to better understand our web traffic and marketing effectiveness;
- k) improving the Site or our services;
- l) personalizing any interactive tools to better facilitate your use of the Site;
- m) for such purposes for which BuyProperly may obtain consent from time to time; and
- n) as otherwise may be permitted or required by applicable law.

#### **With whom do we share your Personal Information?**

We identify to whom, and for what purposes, we disclose your Personal Information, at the time we collect such information from you and obtain your consent to such disclosure. We may transfer your Personal Information to third party service providers with whom we have a contractual agreement that includes appropriate privacy standards, where such third parties are assisting us with the Purposes – such as service providers that provide telephone support, data storage or processing, hosting, and payment service providers.

In addition, we may send Personal Information outside of the country for the Purposes, including for process and storage by service providers in connection with such Purposes. However, you should note that to the extent that any Personal Information is out of the country, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

#### **How do we ensure the privacy of your Personal Information when dealing with third parties?**

We ensure that all third parties (including our affiliates) that are retained to perform services on our behalf and are provided with Personal Information are contractually required to observe the intent of this Privacy Statement and our internal privacy policies and practices.

#### **When and how do we obtain your consent?**

We generally obtain your consent prior to collecting, and in any case, prior to using or disclosing your Personal Information for any purpose. You may provide your consent to us either orally, electronically or in writing. The form of consent that we seek, including whether it is express or implied, will largely depend on the sensitivity of the Personal Information and the reasonable expectations you might have in the circumstances.

#### **How long will we utilize, disclose or retain your Personal Information?**

We have established minimum and maximum retention periods and procedures for maintaining and destroying your Personal Information. We may keep a record of your Personal Information, correspondence or comments in a file specific to you. We will utilize, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which that Personal Information was collected and as permitted or required by law.

#### **How can you review your Personal Information that we have collected, utilized or disclosed?**

You may make a written request to review any Personal Information about you that we have collected, utilized or disclosed. We will provide you with any such Personal Information to the extent required by law. We will make such Personal Information available to you in a form that is generally understandable and will explain any abbreviations or codes.

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information. Any such identifying information shall be used only for this purpose.

**How fast will we respond to your written requests?**

We will attempt to respond to each of your written requests not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit. You have the right to make a complaint to the Privacy Commissioner of Canada or applicable provincial privacy commissioner in respect of this time limit.

**Are there any costs to you for requesting information about your Personal Information or our privacy practices?**

We will not charge any costs for you to access your Personal Information in our records without first providing you with an estimate of appropriate costs, if any.

**How do you know that the Personal Information we have on you is accurate, and what if the Personal Information we have on you is inaccurate?**

We will ensure that your Personal Information is kept as accurate, complete and up-to-date as possible. We will not routinely update your Personal Information, unless such a process is necessary. We expect you, from time to time, to supply us with written updates to your Personal Information, when required. At any time, you can challenge the accuracy or completeness of your Personal Information in our records. If you successfully demonstrate that your Personal Information in our records is inaccurate or incomplete, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

**What safeguards have we implemented to protect your Personal Information?**

We have implemented commercially reasonable physical, organizational, contractual and technological security measures to protect your Personal Information against loss, theft, and unauthorized use, disclosure, or modification including:

- a) the only employees who are granted access to your Personal Information are those with a business 'need-to-know' or whose duties reasonably require such information;
- b) premises security;
- c) deployment of technological safeguards such as data encryption, security software and firewalls to prevent hacking or unauthorized computer access; and
- d) internal password and security policies.

**Contact us regarding access to your Personal Information or our Privacy Statement and practices**

Any questions, concerns, comments or complaints regarding your Personal Information or our Privacy Statement and privacy practices, should be forwarded to [our Privacy Information Officer as follows]: [info@buyproperly.ca](mailto:info@buyproperly.ca)

Or by mail at:

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