

INTRODUCTION

We, our parent, subsidiary, affiliated and related entities respect your right to privacy. We recognize the importance of protecting the personal information you provide to us during your visit to our website and are committed to maintaining the confidentiality and security of the personal information that we collect. This privacy policy (the “Privacy Policy”) describes, among other things, the type of personal information we collect, how we use that personal information, the safeguards we have in place, the right to access personal information and to whom that personal information may be disclosed. This Privacy Policy applies to any personal information we receive from or about individuals, like you, who are not employed by us.

For the purposes of this statement, “personal information” means information about an identifiable individual, including but not limited to contact information, such as name, address, e-mail address, telephone number, demographic or household information and credit and financial information.

HOW WE USE THE PERSONAL INFORMATION

We only collect personal information that is directly related to our business activities. By entering personal information onto our website, you are thereby consenting to the processing of your personal information for our business purposes with respect to your prospective home purchase, market research, project/ development planning or for the reasons more particularly described in our preliminary contracts, and purchase and sales contracts, pursuant to the Real Estate Brokerage Act and its regulations. The amount and the type of the information collected will be limited to that which is needed to fulfil the identified purpose(s).

Broadly speaking, we use personal information for the following purposes:

- To respond to requests for information;
- To provide you with customer service;
- To conduct, process and complete transactions with you;
- To make available, promote and offer services, products and/or special offers
- To improve and customise the content and/or layout of our website for individual visitors; and
- To enable us to better serve you.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We have taken appropriate measures to protect the confidentiality and security of personal information collected and stored in our databases. Although appropriate security measures have been put in place to protect against the unauthorized access, use, alteration or loss of personal information, you should be aware that any information transmitted over the internet may be intercepted by third parties. We do not assume any liability for interception, misuse or alteration of any information transmitted over the internet.

Our website may from time to time contain links to other websites that collect personal information. Our Privacy Policy does not extend to such third-party websites and as such, we do not assume any liability for any third-party links, for the privacy practices or policies of such third parties nor the content of such third-party websites. We recommend that you read the privacy statements of such third parties and make an informed decision as to whether you wish to visit their website or provide personal information to such third parties.

Except as may be required by law, internal compliance guidelines or stored as part of routine information technology back up, we will endeavour to retain personal information only for so long as it is necessary fulfill the purpose for which the personal information was collected.

WHO SEES YOUR PERSONAL INFORMATION

Access to your personal information will be restricted to only those persons who need the information in order to carry out our business activities. We do not disclose your personal information without your consent which is why your real estate broker will ask you to sign the OACIQ consent form before engaging in a transaction. There might an exception where specific reference is made when you provide such personal information, or where disclosing that personal information to third parties is directly related to our business activities or necessary in order to provide you with information, products or services. We may also disclose your personal information where we are required to do so by law.

With respect to our business activities your personal information may be provided to the following third parties:

- Any companies or legal entities that are associated with, related to, or affiliated with our current projects/developments or any other future projects/developments, including but not limited to our legal advisors, accountants and/or auditors;
- To the real estate agent and/or broker who introduced you to a specific project/development and/or to us;
- To data processing companies which handle or process marketing campaigns on our behalf;
- A lender or warranty bond provider providing services to us or you for a project/development;
- An insurance company providing coverage to us or to you;
- Any trades, sub-trades, suppliers, contractors or other cable television, telephone, internet, security and utility service providers working on any of the projects/developments; /
- Any relevant governmental authorities or agencies; or
- Any other parties disclosed in agreements of purchase and sale that are signed by you.

These third parties are only provided with such personal information as is necessary for them to perform the services for which they have been contracted and are restricted from using the personal information for any other purpose.

HOW WE COLLECT PERSONAL INFORMATION

Wherever possible, personal information will be collected directly and with consent from the individual about whom it pertains; however, we may on occasion collect personal information from third parties.

For each visitor to our website, our server may recognize the visitor's domain name and e-mail address (where applicable).

We collect the visitors' domain name, aggregate information on what webpages visitors' access, information voluntarily given by visitors such as personal information, survey information and/or site registrations.

We may also collect some basic information regarding the use of our website. This type of non-identifiable information can be collected automatically, that is not by registration or the completion by you of any on-line surveys, forms or questionnaires. This information could include the amount of traffic visiting the website, which webpages are visited and for how long, the type of internet browser being used, the type of computer operating system being used and the domain name of the website from which a link is made to our website, if any. This information is used only in the aggregate to help us better understand trends and patterns evolving in the marketplace which will in turn allow us to improve the quality of our website.

COOKIES

A "cookie" is a small amount of data that our website can send to your internet browser which may then be stored on your computer's hard drive so that we can recognize you when you return to our website in the future. We may use cookies to store visitor's preferences, record session information, record user-specific information on what webpages users access or visit, alert visitors to new areas we think might be of interest to them when they return to our website, record past activity at a site in order to provide better service when visitors return to our site, customize website content based on visitors' browser type or other information that the visitor sends. You may set your web browser to notify you when you receive a cookie or to not accept certain cookies. You do not have to accept any cookies to access or search our website. However, there may be minimal loss of functionality if you have disabled or deleted all cookies.

RIGHT TO ACCESS TO PERSONAL INFORMATION

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information you should contact our Privacy Officer using the contact information set out below. Please note that any such requests must be in writing. While you have the right to access your personal information, that right is not absolute. We may refuse to provide you access to your personal information where such refusal is permitted or required by applicable law. We will endeavour to inform you of the reasons why, subject to any legal restrictions, access has been denied.

CONSENT AND UNSUBSCRIBE

You may change or withdraw your consent at any time. If you have received correspondence from us and no longer wish to receive any more correspondence in the future, please let us know by contacting our Privacy Officer using the contact information set out below. We will, subject to legal or contractual restrictions and reasonable notice, ensure your name is removed from our distribution list(s).

GOOGLE ANALYTICS AND GOOGLE ADWORDS

We use Google Analytics, which allows us to gather and analyze information about the areas that you visit on our website that will be used to personalize our website in accordance with your interests and assumed preferences. Google Analytics is a web analysis service provided by Google. Our website also uses the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors

who haven't completed a task on our site, for example using the contract form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third party vendors, including Google, use cookies to serve advertisements based on your past visits to our website.

You can find Google's privacy policy here (<http://google.com/intl/en/policies/privacy/>). You can opt out and prevent Google Analytics from using your data by installing Google Analytics Opt-out Browser Add-on: (<http://tools.google.com/dlpage/gaoptout/>). You can opt out or set your preferences on the Google Ad Preferences page. Your continued use of our website without opting out means that you understand and agree with these terms.

CONTACTING US

If you have any questions or concerns regarding our Privacy Policy or wish to access or update your personal information, please contact our privacy officer by email at valerie.masse@engelvoelkers.com. All complaints will be investigated as soon as is practicable in the circumstances.

REVISION TO THIS PRIVACY POLICY

We reserve the right to update the Privacy Policy at any time to reflect changes in legal obligations or changes in the manner in which we deal with personal information, without notice, and encourage you to refer back to our Privacy Policy on a regular basis.

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