

CARUSO DANIELSON (2019) INC. – PRIVACY POLICY

1. Privacy Statement

As a member of the British Columbia Association of the Appraisal Institute of Canada (the “AIC”), Caruso Danielson (2019) Inc., our contractors and staff are committed to respecting the confidentiality and privacy of personal information provided to us by our employees and by our clients. We have adopted the ten privacy principles set out in the Canadian Standards Association *Model Code for the Protection of Personal Information* and embodied in the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”). We observe our obligations under PIPEDA, under provincial legislation in effect in Quebec, British Columbia and Alberta to the extent applicable, and under such other applicable provincial privacy laws, which are substantially similar to PIPEDA as may come into force from time to time. We will collect, use and disclose personal information only for such purposes and to such extent as is necessary to enable us to provide our services as professional real estate appraisers and to fulfill our roles as active members of the AIC.

2. Definition of Personal Information

Personal information is information about an identifiable individual but does not include the name, title or business address or telephone number of an employee of a business. Personal information includes personally identifiable information such as a person’s home address and residential contact information, age, gender, income, credit rating, financial information, consumer preferences, health status and political affiliations.

3. Purposes of Use of Personal Information

We collect personal information for the sole purpose of enabling us to perform independent real estate appraisals for our clients. In the course of performing these services, we will require the name, address (including both business and home addresses on occasion), business, cell, fax and home telephone numbers and email addresses of identifiable individuals. We may also require in certain circumstances information relating to the purchase price paid for real property, the details of any real estate transaction relating to a subject property, details of any lease transaction and documentation relating to a subject property, financial information relating to repairs or renovations on a subject property, individual credit history, income and other sensitive financial personal information of identifiable individuals.

4. Manner of Collection, Use and Disclosure of Personal Information

As noted above, we will only collect, use and disclose personal information for the purposes of providing services to our clients, and for purposes ancillary thereto, such as billing and collection of accounts in respect of which credit has been extended. We will collect personal information in personal interviews, from letters of instruction, from order forms, from financial institutions and from other business contacts or real estate agents. By providing us with such information, individuals are deemed to consent to its use for the purposes set out herein. When we require sensitive financial personal information, or other information of a particularly sensitive nature, we

will seek to confirm that consent was given for the disclosure of such information prior to collecting, using or disclosing such information.

We will not use personal information for any other or secondary purpose. Specifically, we will not provide personal information, either by way of sale or other disclosure, to any marketing agency, mail house, data processing agency or any other promotional entity or third party without express written consent. We will not collect information which we do not require in the course of providing our services.

5. Retention and Disposal of Personal Information

We will not retain personal information longer than is necessary for the purposes of serving our clients hereunder and as otherwise required by legislation. Specifically, certain appraisals are made for mortgage lending purposes and for tax valuation purposes and accordingly, we retain such information and personal information forming the basis of such information for periods equal to the reassessment limitations periods imposed by tax legislation, to comply with our insurance requirements, and as otherwise required to comply with applicable laws. In general, we will retain client files and personal information therein for a period of 7 years, after which time we will no longer need to retain such information. When we no longer have any use for the personal information, we dispose of it by having it shredded or destroyed in the case of physical files and documents, and by erasing the files from our hard drive or other storage medium in the case of electronic data files.

6. Protection and Security of Personal Information

We have implemented policies and procedures to ensure that personal information is protected from unauthorized access, use, tampering, loss or disclosure. Firstly, only those who will be involved in the provision of the services will have access to personal information. Secondly, all personal information which is retained on our computers will be stored in secure folders and will not be available for general access in our organization. All computer and information systems with internet access will be equipped with firewalls, antiviral software and power source back up to ensure the security and integrity of your personal information.

In the event that we require the services of third parties and need to provide personal information to such third party for the purposes of providing our services, we will first confirm that consent has been provided to so disclose the information. Upon confirming the relevant individual's consent, we will not provide such information until we receive reasonable assurances from any such third party that they have in place a privacy policy which is substantially similar to this policy.

7. Review of Accuracy of Personal Information on File

If an individual has a concern with the accuracy or contents of their personal information which we have on file, such individual may contact our privacy officer to request particulars of his or her personal information. Any such request must be made in writing and addressed to the privacy officer at the address set out below. The privacy officer shall review such request and endeavour

to respond within 30 days. The privacy officer may refuse to provide this information to the individual if so providing it would result in disclosure of personal information about a third party who has not consented to such disclosure. The privacy officer may also refuse to provide such information where such information: is protected by solicitor-client privilege; cannot be separated from confidential commercial information; the disclosure of which would result in the breach of an agreement or of a law of Canada or one of its provinces. The privacy officer may request that the individual provide documentation or evidence to support the challenge to the accuracy of the personal information on file. The privacy officer reserves the right to review such documents and evidence and shall upon being convinced of error or inaccuracy, amend the individual's personal information accordingly.

8. **Privacy Officer**

In order to review personal information, to express any concern relating to privacy or review our compliance with this privacy policy or any relevant federal or provincial privacy legislation, an individual may contact us by mail, email or telephone at the contact information set out below:

Lee Knull, BBA, AACI, P.App.

Attention: Privacy Officer

Caruso Danielson (2019) Inc.

210 - 347 Leon Avenue

lee@cdinc.ca

250-861-4460, extension 204

More general information may be found on the website of the Information and Privacy Commissioner of Canada at www.privcom.gc.ca. The Commissioner can be reached by mail at 112 Kent Street, Ottawa, Ontario, K1A 1H3, and toll free by phone at 1-800-282-1376.