



## **ARTIS REAL ESTATE INVESTMENT TRUST PRIVACY POLICY**

### **1. PURPOSE AND OBJECTIVE**

Your privacy is important to Artis Real Estate Investment Trust, including all of its various divisions, subsidiaries and affiliated companies, (collectively, "Artis", "we", "us" and "our").

This Policy was developed to ensure that personal information we collect and which is in our control is protected and used responsibly and in accordance with privacy principles. This Policy applies to personal information in whatever form it may be collected. Examples of personal information include names and contact information, contact details and other information you may provide to us as we interact, including as you use this website or enter onto our properties. Please review this Policy.

We regularly assess our practices to ensure that individual privacy is respected and this Policy may be updated from time to time. The date of the most recent update is identified at the end of the Policy.

We are responsible for personal information in our possession or under our control. We conduct business in a manner that fulfills our commitment to privacy in accordance with our obligations under the Personal Information Protection and Electronic Documents Act.

### **2. PURPOSE OF COLLECTION**

From time to time we receive and retain personal information from and about individuals including our employees, our business contacts, our investors, and our representatives for the purpose of:

- (a) communicating with you;
- (b) providing services you request;
- (c) meeting legal and statutory requirements;
- (d) managing our business and operations;
- (e) managing the services we provide to tenants;
- (f) strategic planning;
- (g) developing new services or enhancing existing services;
- (h) investor relations and services;
- (i) providing security and safety on the properties we own; or
- (j) maintaining employee and business performance evaluations and work-related issues.

### **3. COLLECTION AND CONSENT**

Personal information is primarily collected directly from you, but we may also collect information through external sources such as land title registries, government agencies, creditor and financial institutions, credit bureaus, references and employers.

We collect information from you for use in marketing information to you which may be of interest to you. We collect information and aggregate it in an anonymized manner for analysis of the market and utilize that information to develop our business strategies.

We collect and use information through the use of cookies and other electronic means and use that information to enhance our website and the services we provide. By continuing to use our website, you are consenting to the collection of this information.

### **4. LIMITING COLLECTION AND DISCLOSURE**

We will limit the collection of personal information to that which is necessary for the purposes we have identified and use only fair and lawful means.

We do not disclose any non-public personal information to any third party, except as may be required by law. Personal information may be disclosed to our service providers for the purpose of performing contracted functions. Personal information may be shared with our subsidiaries and other business entities controlled by or affiliated with us in order for us to meet our business and legal obligations, including where necessary to transfer personal information when we purchase or sell a property. Where information is shared with third parties we ensure that the service providers agree not to utilize the personal information or disclose that information, except as directed by us and in accordance with this Policy.

### **5. SECURITY MEASURES FOR THE PROTECTION OF PERSONAL INFORMATION**

We maintain security policies, procedures and controls to protect the personal information we receive against loss or theft. We have safeguards in place to prevent unauthorized access, disclosure, copying, use and modification for both hard copy information and electronically stored information in our possession, including policies relating to the use of video cameras on our properties.

We update our security measures, policies and procedures on a routine basis. Our employees, agents and authorized service providers are required to protect the confidentiality of personal information. Access to personal information is restricted to those employees, agents and authorized service providers who require it to do their job.

### **6. RECORD RETENTION AND DESTRUCTION POLICY**

- (a) Employee information will be destroyed as permitted in the appropriate statutes or regulations.
- (b) There is no mandatory time by which personal information associated with our interactions with our tenants, agents, representatives and other business contacts are destroyed, because of the ongoing nature of these relationships and as may be dictated by law.
- (c) Investor information will be retained for tax and regulatory purposes and will be destroyed as permitted in the appropriate statutes or regulations.
- (d) All other personal information collected by us will only be retained for as long as is necessary to meet the purposes for which it was collected.

## **7. USE OF VIDEO CAMERAS AND RECORDINGS**

Our properties may be equipped with video equipment which may be installed and operating in common areas. The video equipment may have sound recording capability, along with other capabilities such as zoom, facial recognition or night-vision features. The video equipment may be operating 24 hours a day. Video recording may occur at any time.

The purpose of this equipment is to ensure safety and security to those who have access to the property; to provide safety and security to the tenants, premises, equipment and services that we have agreed to provide and to preserve our property, and to deter crime. The use and viewing range of this equipment is limited to specific security personnel and their supervisors who are subject to policies relating to access, review and retention of that recording.

Where required by law, signs will be posted informing that video equipment is operating and recording. Entrance onto properties where video recording is being performed is consent to the use of that information. The video recordings are stored in a secure location, with limited access, and are destroyed when the recordings are no longer necessary for the aforementioned business purpose. You can contact our Privacy Officer if you have questions regarding the video recordings.

## **8. ACCESS TO PERSONAL INFORMATION**

Access to personal information that we hold about you may be requested and, except in limited circumstances where legal reasons prevent us from so doing, it will be provided to you. We will endeavour to keep all personal information accurate and up to date. If you find that personal information we have collected is not accurate, please advise us. We will respond to requests within 30 days.

## **9. RESOLVING COMPLAINTS**

Our Privacy Officer may be reached at (204) 947-1250.

## **10. CHANGES TO OUR PRIVACY POLICY**

Artis reserves the right to change this Policy from time to time. If we make a material change, this Policy will be updated accordingly. We recommend that you periodically review this Policy, which is available in our office and on our website so that you are aware of any changes. Your use of our website following the posting of any changes to this Policy shall constitute your acceptance of these changes.