

Boffo Properties Privacy Policy

Boffo Properties Inc. ("**Boffo Properties**" and the words "**we**" or "**us**" when used in this Privacy Policy refer to Boffo Properties Inc. and, where applicable, any service providers collecting, using or disclosing personal information on behalf of Boffo Properties Inc.) recognizes the importance of protecting personal information. Boffo takes the protection of personal information seriously and we want each purchaser, tenant or customer of Boffo (referred to in this Privacy Policy as a "**customer**" or "**you**") to feel comfortable when interacting or transacting with Boffo, purchasing your home or leasing commercial premises. Any personal information collected by Boffo Properties will be treated with care and with consideration to existing laws related to protecting your privacy. This Privacy Policy provides information on how we collect, store, use and disclose any personal information provided to us during your tenure as a customer of Boffo Properties.

Boffo Properties has developed this Privacy Policy in compliance with British Columbia's *Personal Information Protection Act*, S.B.C. 2003, c. 63 ("**PIPA**") and the federal statute, the *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5 ("**PIPEDA**"). We will inform our valued customers of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

CONSENT

We may collect personal information directly from you in writing or by phone, fax, e-mail or other methods. When you provide us with your personal information, you consent and agree to our use and disclosure of your personal information in accordance with this Privacy Policy. The personal information that we collect about you will be with your consent, by your use of any website or services or products of Boffo Properties. To the extent permitted by law, your consent may be implied or express. Consent may be implied where you are given notice, and a reasonable opportunity to opt out of your personal information being used for the marketing of new services or products, and you do not opt out. Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn. If you provide us with the information of someone other than yourself, then we are relying on your guarantee that you have that person's consent to disclose their information to us.

PERSONAL INFORMATION GENERALLY DEFINED

"Personal information" means any information pertaining to an identifiable individual, as more particularly described under applicable Canadian privacy legislation. This may include an individual's name in combination with the individual's address, date of birth, e-mail address, gender, government issued identification number, account number, and credit card number. This may also include any information from which a person can be identified directly, or indirectly, in particular by reference to an identification number or to one or more factors specific to their physical, physiological, mental, economic, cultural or social identity. To the extent permitted by law, personal information does not include (i) information pertaining to an organization as distinct from an individual person, (ii) the name, title, business address or office telephone number of an employee of an organization, or (iii) the name, address, telephone number or other information of a person that is publicly available (e.g. such as the information that is available in a public telephone directory).

USE OF PERSONAL INFORMATION

Collecting personal information about you is essential to our being able to provide the homes, commercial premises and related products and services that best meet the needs of you and our other customers. Boffo Properties may collect personal information, as defined in this Privacy Policy, for the purposes of the supply of homes or commercial premises built or leased by Boffo Properties and all services and transactions related thereto and your use of same, the identification of customer preferences, and maintenance of quality of service. Any information collected may also be stored, retained or used in other Boffo Properties business processes including, but not limited to, client account-management and payment authorization. Any personal information collected but not stored or maintained in the regular course of business will be securely destroyed.

We will only use or disclose customer personal information where necessary to fulfill the purposes identified at the time of collection, the purposes set out in this Privacy Policy, or for a purpose reasonably related to those purposes. When you request information, residential or commercial real estate inventory, products or services from us, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such personal information for the purposes set out above. During the course of business, we collect personal information from our current and prospective customers and make every effort to ensure the security and privacy of that information. We only collect information that we have requested and you have voluntarily provided to us.

This information will be used for the purposes for which it was collected, including the following, as appropriate:

- (i) if you are a Boffo Properties customer, we require your information to complete the purchase and sale of your home from Boffo Properties, and this process may include sharing your information with suppliers and service providers as required to complete the purchase and sale transaction;
- (ii) we may use your contact information to send you further information that may be of interest to you;
- (iii) we may use your personal information to analyze and improve our marketing, design and promotional efforts; and
- (iv) from time to time, we will share statistical information in aggregate which reveals no personal details about you. These purposes allow us to conduct business with our valued customers, improve our neighbourhoods and homes, and better meet our customers' needs. We do not sell or rent any personally identifiable information about you to any third party.

You also authorize us to use and retain this personal information for as long as it may be required for these purposes. You may choose not to provide some or all of your personal information to us, but this may prevent us from providing our services to you or limit our ability to provide you with the level of service that you would otherwise expect from us as a client.

COLLECTION OF PERSONAL INFORMATION

When you request services or information from us such as registering for any pre-sale lists, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such personal information for the purposes set out in this

Privacy Policy. You also authorize us to use and retain this personal information for as long as it may be required for these purposes. Some information about you is automatically collected, including, but not limited to, your IP address (please see “USE OF WEBSITE AND TRACKING” below).

We may collect, use or disclose personal information without a client’s knowledge or consent in the following limited circumstances:

- when the collection, use or disclosure of personal information is permitted or required by law;
- in an emergency that threatens an individual's life, health, or personal security;
- when the personal information is available from a public source (e.g. a telephone directory);
- when we require legal advice from a lawyer;
- for the purposes of collecting a debt;
- to protect ourselves from fraud; or
- to investigate an anticipated breach of an agreement or a contravention of law.

While the personal information we collect may come directly from you, it may also be provided by third parties.

SHARING OF PERSONAL INFORMATION WITH AFFILIATES AND THIRD PARTIES

By entering into a transaction with Boffo Properties, requesting any products or services and entering into any contracts for the purchase of your home or lease of any commercial premises, you agree that Boffo Properties may share personal information with its affiliates and with third parties acting on its behalf or at its direction for purposes relating to Boffo Properties operations, maintenance, administration, improvement and client oversight. Boffo Properties does not disclose or sell your personal information to third parties for marketing purposes.

Disclosure of personal information may occur in connection with a corporate transaction, proceeding or reorganization of Boffo Properties business for or by which the information is maintained. More specifically, in the event that Boffo Properties intends to sell or transfer ownership or control of any or all of our business, products, operations or services to a third party, we reserve the right to disclose certain personal information to a potential buyer both before and after the purchase, subject to conditions discussed below. However, in the event the sale goes through, we will require that the receiving party agree that they will be similarly bound by the provisions of this Privacy Policy or a comparable policy and that they will only use and disclose your personal information in accordance with applicable law. In the event the sale does not complete, Boffo Properties will require the potential purchaser to not use or disclose your personal information in any manner whatsoever and to erase the same. Personal information may also be disclosed as permitted or required by law or when Boffo Properties believes disclosure is necessary to protect its rights and/or comply with a judicial proceeding, court order or other applicable law.

SECURITY AND NOTICE OF BREACH

Boffo Properties complies with industry standards to protect the personal information it maintains from misuse, loss, unauthorized access and modification or disclosure in violation of this Privacy Policy. Security measures have been integrated into our design, implementation and day-to-day operating practices as part of Boffo Properties continuing commitment to the protection of personal information held by it. We employ physical, electronic and procedural safeguards to protect our systems and all personal information under our control against unauthorized access and use. All safety and security measures are appropriate to the sensitivity level of the information collected. This protection applies in relation to personal information

stored in both electronic and hard copy form. You should keep in mind that no internet transmission is ever 100% secure or error-free.

We use appropriate security measures when destroying a client's personal information. We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Boffo Properties will notify its clients as promptly as possible of any privacy breach after discovering or receiving notification of the breach if Boffo reasonably believes the information has been acquired by an unauthorized person or is subject to an unauthorized use.

ACCESS TO PERSONAL INFORMATION

Upon request, with sufficient detail to enable Boffo Properties to identify the individual and the personal information being sought, you may access certain personal information collected by Boffo Properties that Boffo Properties maintains at the time of your request. Boffo Properties will provide reasonable and practical access to your personal information in accordance with any applicable laws. Details of how to contact us are set out below. There may be instances where Boffo Properties cannot provide you access to your personal information, for certain reasons, including, but not limited to, it has been destroyed or deleted after expiry of applicable retention periods, it contains personal information of other persons, or it contains commercially sensitive or proprietary information owned by us. If we are unable to provide you access, we will explain why and document that for our records. A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform you of the cost and request further direction from you on whether or not we should proceed with the request.

ACCURACY / CORRECTION OF PERSONAL INFORMATION

We rely on you to keep us informed of any changes in your contact information or personal information, such as a change of address, telephone number, or any other circumstances. Please contact one of our customer service representatives or our Privacy Officer, to verify or amend the information we have about you. When reasonable and commercially practicable, Boffo Properties, upon notice, will correct any inaccuracies in your personal information.

USE OF WEBSITE AND TRACKING

Use of Internet Protocol (IP) Addresses: An IP address is a unique number that is automatically assigned to your computer, smart-phone or other device whenever you are surfing the Internet so that your computer, smart-phone or device can be identified by the main computers, known as Web servers, that serve webpages. This allows us to identify and gather general information about your use of Boffo's products and services.

Some information about you is automatically collected when you use our websites including, but not limited to, your IP address, hosting server, browser, operating system, browser language, service provider, domain names, access times and referring website addresses. This information may be used by Boffo Properties for the operation of its website, to maintain quality of the website, and to provide general statistics regarding use. Boffo Properties apps, if any, collect IP addresses for the purposes of helping us diagnose problems with our main computers and for system administration. We do not normally link IP addresses to anything personally identifiable, which means that a user's session will be logged, but the user will remain anonymous to us. However, we can, and will, use IP addresses to identify you when we feel it is

necessary to enforce compliance with our website terms of use or to protect our services, products, clients, users, or others.

Boffo Properties website, products or services, may use “cookies” to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by the webpage server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. This simplifies the process of recording your personal information, such as contact information and so on. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of Boffo Properties website, products or services.

CHANGES TO PRIVACY POLICY

Boffo reserves the right to change this Privacy Policy from time to time. We encourage you to periodically review this Privacy Policy to be informed of how Boffo is protecting your information. Regardless of any changes we make to our Privacy Policy, we will only use your personal information in accordance with the version of the Privacy Policy in place at the time you provided your information, unless you later give your express consent for us to do otherwise.

QUESTIONS/COMPLAINTS

Boffo Properties has designated individuals to act as Privacy Officers, responsible for ensuring compliance with this Policy, the PIPA and the PIPEDA. Questions and complaints regarding Boffo Properties handling of personal information should be directed to Boffo Properties Inc. at 1391 Venables St, Vancouver, BC V5L 2G1, Canada – *Attention Privacy Officer*.

This Privacy Policy is effective December 12, 2018.