

# Magnum York Property Management Ltd. Privacy Policy

Effective Jan 1, 2021

Magnum York Property Management Ltd. ("**Magnum York**"/"we"/"us"/"our") respects your privacy and is committed to protecting it. We make the websites [www.magnumyork.com](http://www.magnumyork.com) and any subdomains of the foregoing (the "**Website**") as well as Property Management Services supported by a database system and related web portals for Condo Boards and Investment Owners (the "**Services**"). As we provide our Services, we want you to be clear how we are using information and the ways in which we protect your privacy.

This Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information and when we disclose it.
- How to access and update your personal information.

By using our services, you consent to the practices described in this policy.

Your privacy matters to us so please take the time to familiarize yourself with our policies, and if you have any questions please contact us at [privacy@magnumyork.com](mailto:privacy@magnumyork.com).

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Magnum York collects and processes your personal information through your use of the Website and the Services, including any information you may provide when you request a proposal of our services, when you purchase or use our Services, when you search our Website, when you subscribe to our email alerts, when you contact our customer service, when you participate in surveys, public forums, chats, or when you respond to one of our requests for suggestions and other content.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. This Privacy Policy supplements the other notices and is not intended to override them.

Our Services are not directed to children under the age of 16. We do not knowingly collect, maintain, or process children's Personal Information unless the child's parent or guardian consents and provides the information. If we determine that we have received a child's Personal Information from a source other than the child's consenting parent/guardian, we will immediately delete the information.

### Third-Party Links

Our Website may include links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these

third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

## 2. THE INFORMATION WE COLLECT

Personal data or personal information has the specific meaning given by the applicable legislation. Generally, it means any information relating to an identifiable person who can be directly or indirectly identified. It does not include data which is not related to an identifiable person (anonymized data).

We may collect, use, store and transfer different kinds of personal information which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Information** includes payment details such as bank information.
- **Transaction Data** includes details about payments to and from you and other details of services.
- **Technical Data** includes internet protocol (IP) address, your device's unique ID number, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating systems and platform and other technology on the devices you use to access this Website and Services.
- **Regulatory Data** includes information we collect required by law, and in some cases submitted to government authorities on your behalf.
- **Service Issues and Maintenance Request Information** include service descriptions, resolutions, vendor dispatching, notes, bylaw infractions.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from personal information but is not considered personal information in law as this information does not directly or indirectly reveal your identity. For example, we may aggregate your Client Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

### If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our Services). In this case, we may have to cancel a Service you have with us, but we will notify you if this is the case at the time.

## 3. HOW PERSONAL INFORMATION IS COLLECTED

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you

provide when you:

- sign up for a proposal for Services;
  - create an account on MYWebPortal or MYCustomerWebAccess;
  - purchase one of our Services;
  - lease a unit or house;
  - subscribe to our email alerts;
  - complete one of our online forms to receive our special guides and content;
  - access one of our help topics or videos;
  - contact our customer service; either through phone, completing a service form or through our online portal
  - participate in our online or in-person training and webinars;
  - participate in our opinion surveys;
  - give us feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
  - **Third parties or publicly available sources.** We may receive personal information about you from various third parties and public sources, for e.g. Technical Data on our website from the following types of sub-processors: analytics providers, such as Google Analytics and Google Ads
  - **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services.

## 4. HOW WE USE PERSONAL INFORMATION

We will only use personal information in accordance with the terms of this Privacy Policy and applicable law. Most commonly, we use personal data to perform the contract we have entered into with you, to respond to your requests, to comply with legal or regulatory obligations or requests and to manage our business.

Specifically, we use personal information for the following purposes:

- To process payments
- To maintain your web portal account
- To present our Services and analyze how they are used;
- To secure our Services and physical locations against fraud, malicious activity, or conduct that may violate our terms of use;
- To personalize and improve your experience with the Service;
- To provide you with information, products, or services that you request from us;
- To show you ads tailored to your preferences;
- To notify you about changes to our Service and any products or services we offer or provide through them;
- To allow you to participate in interactive features on the Service;
- To provide you with periodic product newsletters, informational guides and other educational content;

- To contact you and provide you with help if you have a customer service issue;
- To contact you to fill out surveys and participate in other types of market research;
- To notify you of new products or services we think you might be interested in;
- To comply with our legal obligations;
- In any other way we may describe when we collect the information; and
- For any other purpose with your consent.

### **Automatic Tracking On Our Website**

Automatic tracking takes place through the use of our services and access to the Website. This tracking includes tracking of machine IDs, license codes and tokens to verify users' rights to access and use the services. Cookies are used by us to track content usage and traffic on the Website. A cookie is a feature of your web browser that consists of a text file that is placed on your hard disk by a web server. The Website and our services use cookies to compile aggregate statistics about usage of this Website, such as how many users visit the Website, how long users spend viewing the Website, and what pages are viewed most often and for users of our services, for verification, authentication and to manage sign-in to our Website. This information is also used to improve the content of the Website. You can set your browser to notify you when you are sent a cookie. This gives you the chance to decide whether to accept it. If you disable cookies, you will not be able to log in to access the services provided to registered users through our Website.

Your IP address is reported by your web browser whenever you visit a page on the Website. This information is recorded together with your registration information on our databases.

## **5. HOW WE SHARE PERSONAL INFORMATION**

We may have to share your personal information with the following parties set out below for the purposes described in section 4, above.

- Third Party categories as set out below:
  - Service providers who provide IT and system administration services
  - Consultants in the field of software, systems and security
  - Professional advisers including lawyers, bankers, auditors and insurers based in Canada who provide consultancy, banking, legal, insurance and accounting services.
  - Vendors such as contractors, trades, engineers, consultants and other vendors who assist or support us providing the services. Vendors are prohibited from retaining, using or disclosing personal information we share with them for any purpose than providing services to our clients.
  - Regulators and other government authorities who require reporting of processing activities in certain circumstances.
- Analytics, Social Media and Advertising Partners. We may share your Personal Information with analytics providers, advertising networks, or social media companies to measure performance of our Service or marketing efforts, offer social media features, or deliver interest-based advertising. This sharing may involve the use of browser cookies and similar technologies placed through our Service by our partners, as explained here. For example, when you visit our Site, our partner's Cookie may cause your browser to automatically send a request to our partner's server and provide our partner with your IP address, other Identifiers, Device Information and Internet Activity.

- **Mandatory Disclosures And Legal Proceedings.** We may have a legal obligation to disclose Personal Information to government authorities or other third parties pursuant to a valid regulatory request, subpoena or court order. We may also need to disclose and otherwise process your Personal Information in accordance with applicable law to prevent physical harm or financial loss, protect the vital interests of a person, enforce our various policies or terms of use, protect our property, services and legal rights, prevent fraud, support auditing, compliance and corporate governance functions, or comply with applicable law.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.
- We will share your Personal Information with other third parties as you may direct or otherwise consent.

We require all third parties to respect the privacy and security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

## 6. DATA SECURITY

We use commercially reasonable efforts to store and maintain your Personal Information in a secure environment. We have implemented procedures designed to limit the dissemination of your Personal Information to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to you.

You are also responsible for helping to protect the security of your Personal Information. For instance, never give out your password, and remember to log out of your account and close your browser window when you have finished using the Website, so that other people using the same computer will not have access to your Personal Information.

## 7. DATA RETENTION

We retain personal information to fulfil the purposes we collected it for, including for the purposes of performing a contract with you and for satisfying any legal, audit, accounting, or reporting requirements or obligations which apply to us, or to provide historical perspective of transactions.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Tax and financial information that is past seven years may be destroyed as per CRA (Canada Revenue Agency).

## 8. WEBSITE COOKIES

A browser cookie is a small piece of data that a website stores in your device's browser. It holds information that the site uses to function properly, remember your preferences, or personalize your experience. A typical cookie contains a cookie ID, which is a unique string of characters used to identify

your browser during the browsing session, or in some cases, during subsequent browsing sessions. Cookies, cookie ID's and similar pieces of data may be considered Personal Information (Identifiers or Internet Activity) under applicable law.

Other online technologies, similar to cookies, may allow users to be identified and tracked across multiple browsing sessions, and in some cases tracked across different websites and online services for marketing or advertising purposes. These technologies include, but are not necessarily limited to, pixels, web beacons and scripts (collectively with browser cookies, "Cookies").

Our Service uses "first party" Cookies, which are set by [www.magnumyork.com](http://www.magnumyork.com). Our Service also uses some "third party" Cookies, which are set by other web domains associated with our vendors or partners.

## 9. ACCESS AND ACCURACY

You have the right to access the Personal Information we hold about you in order to verify the Personal Information we have collected in respect to you and to have a general account of our uses of that information. Upon receipt of your written request, we will provide you with a copy of your Personal Information although in certain limited circumstances, we may not be able to make all relevant information available to you such as where that information also pertains to another user. We will endeavour to deal with all requests for access and modifications in a timely manner.

We will make every reasonable effort to keep your Personal Information accurate and up to date. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose your information. Having accurate Personal Information about you enables us to give you the best possible service.

## 10. AMENDMENT OF THIS POLICY

We reserve the right to change this Privacy Policy at any time. If we decide to change this Privacy Policy in the future, we will post an appropriate notice on the Website. Any non-material change (such as clarifications) to this Privacy Policy will become effective on the date the change is posted and any material changes will become effective 30 days from their posting on the Website. Unless stated otherwise, our current Privacy Policy applies to all Personal Information that we have about you and your account. The date on which the latest update was made is indicated at the top of this document. We recommend that you print a copy of this Privacy Policy for your reference and revisit this policy from time to time to ensure you are aware of any changes. Your continued use of the Website and Services signifies your acceptance of any changes.

## 11. CONTACT US

You can help by keeping us informed of any changes, such as a change of address or telephone number. If you would like to access your information, if you have any questions, comments or suggestions, or if you find any errors in our information about you, please contact us by one of the methods set out on our website: [www.magnumyork.com/contact-us](http://www.magnumyork.com/contact-us). Contact our privacy officer at [privacy@magnumyork.com](mailto:privacy@magnumyork.com)