

PRIVACY POLICY

The website www.cwstevenson.ca (the “**Site**”) is operated by CW Winnipeg Inc. (“**CW Winnipeg**”) and Stevenson Management Services Ltd. (“**SMLS**”) (together referred to as “**Operator**”, “**us**”, or “**we**”). We respect your right to control your personal information. That is why we have developed this Privacy Policy which governs and explains how we collect, use and disclose your personal information (the “**Privacy Policy**”).

This page contains the Privacy Policy for the Site, as well as for any other websites or microsites operated by the Operator (collectively and together with the Site, the “**Sites**”), and for web applications, tools, forums, or social media pages offered by the Operator on the Sites, and for any online services offered by the Operator, including but not limited to information provided on the Site in relation to the Operator’s brokerage services, valuation and advisory services, appraisal services, property tax consulting services, market analysis consulting, hospitality valuation and consulting, and property management services, marketing and analytical reports, commercial property listing services, sale of condominium documents, and customer inquiry services (collectively, the “**Service**”).

By accessing or using the Site, you consent to the collection, use and disclosure of personal information by the Operator in accordance with this Privacy Policy. You may choose not to provide us with personal information. However, if you make this choice we may not be able to provide you with the application, service or information that you requested.

1. Definitions

For the purposes of this Privacy Policy, the following words have the following meanings:

“**collection**” means the act of gathering, acquiring, storing, retrieving, recording or obtaining personal information from any source, including third parties, by any means.

“**consent**” means voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative, such as a parent or guardian. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from a user’s action or inaction.

“**disclosure**” means making personal information available to a third party.

“**employee**” means an employee of CW Winnipeg and/or SMLS, and for the purpose of this Privacy Policy only, includes agents, independent and other contractors performing services for the Operator.

“**personal information**” means information about an identifiable individual, but not aggregated information that cannot be associated with a specific individual.

“**processing**” or “**process**” means any operation performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**Subscribing Organization**” means an individual, company, entity or organization that has subscribed to the Service and the site.

“**third party**” means an individual other than the user, or the user's agent, or an organization outside of the Operator or a Subscribing Organization.

“**use**” means the treatment, handling and management of personal information by and within the Operator.

“**user**” means an individual who uses the Service provided by the Operator, including anyone else who accesses or visits the Sites.

2. Collection

We may collect any or all of the following personal information if the information is reasonably required to provide the services accessed or requested by you:

- (a) information that you provide when you complete forms on the Sites, such as your name, postal address, email, and telephone number;
- (b) information that you provide to the Operator when you become a Subscribing Organization;
- (c) information you provide when you access the Site such as your geographical location, browser type and version, operating system, length of visit, page views and website navigation paths;
- (d) your correspondence with the Operator's employees or agents, including but not limited to correspondence with agents in relation to property listings and including any questions, concerns or comments you may have about the Service, the Sites or problems that you report; and
- (e) details of your requests made through the Sites.

The Operator does not collect information related to method of payment such as a credit or debit card number. All purchases of the Operator's products and services will be directed to and handled by third parties such as Stripe. You will be bound by the privacy policies of these third party sites.

3. Processing and Retaining Personal Information

We may process your personal information about your use of our Site and Services. The Operator does not collect IP addresses and any IP addresses are loaded anonymously to the Site. Personal information may be processed for the purposes of analyzing users' use of the Site. The legal basis for this processing is the Operator's legitimate interests, including monitoring and improving its Sites and Services. The Operator will not retain personal information longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

4. Purpose of Collection and Use of Personal Information

The Operator collects your personal information and will use your personal information as is reasonably required for the following purposes:

- (a) to provide web applications, the Site, the Services, and/or the other services or information that you request;

- (b) to improve users' experience of the Site;
- (c) to respond to questions, comments, requests, job applications, or complaints that you submit to the Operator;
- (d) to process payments made by you to the Operator;
- (e) to track communications with you;
- (f) to analyze use of the Site and the Service and to improve the Site and the Service;
- (g) to send emails, newsletters, regular mail or other communications you have consented to receive from the Operator;
- (h) to provide Service and Site-related announcements or notifications to you;
- (i) to detect and protect against fraud and error;
- (j) to fulfill a purpose that we disclose to you when we request your personal information; and/or
- (k) to meet legal and regulatory requirements.

The Operator's staff are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Personal information will only be collected and used by authorized staff in a manner consistent with the activities of the Operator.

5. Disclosure

The Operator may disclose your personal information to:

- (a) each of its employees, agents, partners and service providers as is reasonably necessary to enable these parties to perform a business, professional or technical support function for the Operator;
- (b) a person who, in the reasonable judgment of the Operator, is seeking the information as your agent; and
- (c) a third party or parties, where you consent to such disclosure or the disclosure is required by law.

We may also disclose your personal information in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to such transaction, provided that the information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information.

6. Safeguarding Your Personal Information

The Operator is committed to safeguarding your personal information. The Operator uses appropriate security measures to protect personal information against risks such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction regardless of the format in which it is held. The methods of protection and safeguards used by the Operator

include, but are not limited to, locked filing cabinets, need-to-know access and technological measures, including the use of passwords, encryption and firewalls. While the Operator cannot guarantee that risks such as loss, theft, unauthorized access or disclosure of personal information will not occur, the Operator will make every reasonable effort to prevent such unfortunate and unforeseen occurrences.

The Operator takes care in disposing of or destroying personal information to prevent unauthorized parties from gaining access to the information. The Operator also ensures that its employees with access to personal information are made aware of the importance of maintaining the confidentiality of personal information. Finally, the Operator protects personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

7. Accuracy

The Operator is committed to keeping your personal information as complete, up-to-date and accurate as is necessary for the purposes for which it is to be used. The Operator will promptly correct or complete any personal information found to be inaccurate or incomplete. Where appropriate, the Operator will transmit amended information to third parties having access to the personal information in question. Upon request, the Operator will provide you with a reasonable opportunity to review the personal information in your file to review its accuracy. Such personal information will be provided within a reasonable time of the request and at a minimal or no cost to you.

Also upon request, the Operator will provide an account of the use and disclosure of your personal information within 30 business days after the date of the request and, where reasonably possible, will state the source of the information. In providing an account of disclosure, the Operator will provide a list of organizations to which it may have disclosed personal information about you when it is not possible to provide an actual list. Upon request, the Operator will provide personal information in a structured, commonly used and machine-readable format within 30 business days after the date of the request.

8. Complaints

The Operator will promptly investigate all complaints concerning our compliance with the Privacy Policy and our dealings with your personal information. If a complaint is found to be justified, the Operator will take appropriate measures to resolve the complaint, including, if necessary, amending our policies and procedures. You will be informed of the outcome of the investigation regarding your complaint.

9. Breach

In the event of a breach of personal information, the Operator will promptly inform all users affected by the breach within 72 hours of the Operator discovering the breach. If the breach will affect your rights and freedoms, we will inform you about the breach without undue delay.

10. Withdrawing Consent

You may withdraw your consent to the collection, use or disclosure of your personal information by the Operator at any time, subject to legal or contractual restrictions and reasonable notice. In certain circumstances, your withdrawal of consent will result in the inability of the Operator to

continue providing aspects of the Site and the Service to you. Please contact the Operator for more information regarding the implications of withdrawing consent.

11. Non-Personal Information

Non-personal information is information that does not identify you and which we are unable to connect to other information in order to identify you. The Operator may collect any or all of the following non-personal information:

- (a) Aggregated data resulting from the combination and/or aggregation of certain raw data collected from you or your business (including, but not limited to, financial information and operational data) with other data in a way that no longer personally identifies the user.
- (b) The Sites employ a web analytics service that uses "cookies," which are text files placed on your computer, to help the website analyze how users use the Sites. The information generated by the cookies about your use of the Sites (including your IP address) will be transmitted to and stored by web analytics service providers on servers in the United States. The web analytics service providers will use this information for the purpose of evaluating your use of the Sites, compiling reports on Sites activity for the Sites' operators and providing other services relating to website activity and Internet usage. The web analytics service providers may also transfer this information to third parties where required to do so by law, or where such third parties process the information on the web analytics service providers' behalf. The web analytics service providers will not associate your IP address with any other data held by the web analytics service provider. You may refuse the use of cookies by selecting the appropriate settings on your browser: however, please note that if you do this, you may not be able to use the full functionality of the Sites. By using the Sites, you consent to the processing of data about you by web analytics service providers in the manner and for the purposes set out above.
- (c) We may also use additional analytics programs from time to time to process non-personal information about you.

We make no attempt to link this non-personal information with the identity of individuals using the Sites. Non-personal information may be permanently archived for future use in any manner whatsoever by the Operator.

12. Inquiries

To submit an inquiry, complaint, request a review of your personal information, correct or update your personal information, withdraw your consent or request more information or additional copies of the Privacy Policy contact:

CW Winnipeg Inc. and Stevenson Management Services Ltd.
Mailing Address: 200 – 55 Donald Street, Winnipeg, MB, R3C 1L8
Telephone No.: 204.928.5000
E-mail: info@cwstevenson.ca

13. Unsubscribe

If you are a Subscribing Organization and no longer wish to receive commercial electronic messages from the Operator regarding our new products or services, promotions or other

similar communications, you may unsubscribe [here](#). Please note that, after you unsubscribe, the Operator may still send electronic communications to you in certain limited circumstances, such as to provide you with Site and Service notifications and billing information, or to provide information that the Operator is legally obligated to provide you. Personal information provided to subscribe to our commercial electronic messages is stored on Concep. You will be bound by the privacy policies of these third party sites.

14. Privacy Policy Changes

To accommodate changes in our services, changes in technology and legal developments, this Privacy Policy may change over time without notice to you. We may add, change or remove portions of the Privacy Policy when we deem it is appropriate to do so. We encourage you to review our Privacy Policy periodically. Each time you submit personal information or use the Service you agree to be bound by terms of the Privacy Policy which is then current. Whenever we update the Privacy Policy, we will change the date below to indicate when the changes were made.

Date: October 24, 2018