

# Oxford Privacy Statement

LEGAL



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## OUR COMMITMENT TO YOUR PRIVACY

At Oxford, we are committed to preserving the privacy of your personal information. This Privacy Statement sets out the details of this commitment.

The way in which we collect, use and disclose personal information may change from time to time, and we reserve the right to change or clarify our Privacy Statement. You can review our Privacy Statement by visiting our website, <http://www.oxfordproperties.com>, or requesting a copy from our Privacy Officer.

**This Privacy Statement applies to all operations within Oxford, but does not apply to the personal information of Oxford's employees, prospective employees or contractors.**

### What is personal information?

Personal information is any information that identifies a person, that could reasonably be used to identify a person, or that is about an identifiable person.

Personal information we collect can include non-sensitive information, such as your name, contact information, and demographic information, or may include personal information of a more sensitive nature.



*Underlying our commitment to privacy is the protection of personal information – information about you or that can identify you.*

### How is my privacy promoted?

Under the guidance of our Privacy Officer, Oxford monitors and promotes compliance with privacy laws and internal policies and procedures.

We have established processes for identifying potential privacy breaches and providing appropriate notification of any breaches that may cause real risk of significant harm to an individual, in order to maintain accountability to the owners of all personal information in our possession and control and allow them to mitigate risk. Such notification will be provided without undue delay, but not later than within 72 hours of the discovery of the breach where feasible.



*Because your privacy is important to us, we carefully monitor its collection, use and disclosure.*

### Why is personal information collected?

Knowing you helps us understand your needs, allows us to communicate effectively, and provide you with the services you want. Reasons we collect your personal information include the following purposes (the “identified purposes”):

- evaluating, establishing and maintaining commercial relationships (including landlord/tenant relationships), determining rental rates, administering accounts and fulfilling contractual obligations;



*We collect, use and disclose personal information for one reason – to serve you better.*

- determining your eligibility to lease premises managed by Oxford (including evaluating credit standing and matching credit reporting agency information) and for products and services that may be of interest to you from organizations with whom we have strategic alliances;
- providing you with the services you have requested (for example, newsletters for which you have subscribed);
- researching, developing, managing, protecting and improving our services, including conducting surveys that provide us with feedback on our service standards;
- administering our gift card program;
- making monthly parking arrangements;
- investigating and settling claims;
- compiling statistics, conducting market research and reporting to owners of the buildings we manage;
- tracking website usage, transaction history and patterns, monitoring use of web based digital platforms while on our properties (for example, WiFi hotspots) for the purposes of market research and/or providing tailored messages and advertisements;
- using mobile location analytics (a technology solution that uses Bluetooth and Wi-Fi signals from mobile devices) to create aggregate reports on customer behaviour such as walking paths, dwell time or heat maps exhibiting busy locations;
- administering online chats and posts;
- investigating specific transactions or patterns of transactions to detect unauthorized or illegal activities;
- maintaining appropriate business records, and generally managing and administering our business;
- facilitating business transactions, including evaluating, effecting, monitoring and managing investments;
- responding to your inquiries;
- facilitating safety and security;
- performing functions required or authorized by law; and
- for any other purpose to which you consent.

We only collect and use your personal information as reasonably necessary for the identified purposes.

### Is consent needed for collection, use and disclosure of my personal information?

In most cases, your consent will be needed for Oxford to collect, use or disclose your personal information. However, your consent can be expressly provided or implied, where it is reasonable in the circumstances.

Subject to legal requirements, your consent can be refused or withdrawn for Oxford's collection, use or disclosure of your personal information by notifying our Privacy Officer in writing.



*The type of personal information we collect about you and the reason for the collection will depend on how you do business or interact with us.*



*Your consent can be express or implied where it is reasonable in the circumstances.*

The following are examples of consent, collection, use and disclosure.

### Information You Provide To Us:

When you directly disclose personal information to Oxford or to our service providers and agents, you are consenting to our collection, use and disclosure of your personal information in order to fulfill the identified purposes. This may include the sharing of information with our service providers (for example, financial institutions, actuaries, consultants, auditors, legal advisors, etc.).

We may verify your personal information, or obtain additional personal information about you by checking with credit bureaus and other fact-collecting and verifying entities to assist us in the identified purposes.

If you provide us, our service providers, or our agents with personal information about another person, you represent that you have all necessary authority and/or have obtained all necessary consents from that individual to enable us to collect, use and disclose that personal information.

### Business Transactions:

We try to limit collection, use and disclosure of personal information in the course of transactions, and do not exchange client lists as a matter of course. However, where reasonably necessary for business transactions, we may collect personal information from, or disclose personal information to third-parties. This may include for background checks (including criminal and credit checks), proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance, financing or investment. In these cases, consent is implied, unless express consent is legally required.



*Where reasonable in the circumstances, we imply your consent for business transactions.*

### Oxford Gift Card Program:

The Oxford gift card program is administered by Amex Bank of Canada and Amex Canada Inc. ("Amex Canada"). When you purchase an Oxford gift card through our website or in person, our third-party payments provider will collect and use your personal information on our behalf in order to process your payment. This provider is prohibited from using your personal information for any other purpose and is required to comply with our privacy practices.

Please note that when you purchase an Oxford gift card at one of our shopping centres, or when you register, use and/or check your balance on an Oxford gift card, your personal information is disclosed to, used and controlled by Amex Canada and/or the specific merchant(s) where you redeem the gift card and not by Oxford. Accordingly, Oxford is not responsible for how these third-parties collect, use or disclose your personal information. It is, therefore, important that you familiarize yourself with the privacy policies of these third-parties before providing them with your personal information.



*When you purchase/use an Oxford gift card, enter a survey or contest, or use our websites, your personal information may be collected, used, or disclosed.*

### Website(s):

Use of our website(s) is subject to our policies and procedures. By using our website(s), you are providing us with consent to collect, use and disclose any information that may be provided to us through its use.

Through our website(s), we may place a text file called a "cookie" in the browser directory of your computer's hard drive. A cookie is a small piece of information that a website can store on a web browser and later retrieve. The cookie cannot be read by

any website other than the one that set up the cookie. Most browsers can be set to reject all cookies. If you choose to modify your browser in this manner, some pages of our website may not function optimally and you may not be able to use all features of our website in the future.

Our website(s) often provides links to websites that are operated by third-parties not under our control. This Privacy Statement does not describe the privacy policies of any third-party websites or their privacy practices. Oxford is not responsible for how such third-parties collect, use or disclose your personal information, so it is important to familiarize yourself with their privacy policies before providing them with your personal information.

From time to time our website(s) request(s) personal information from users for surveys or contests sponsored by us, our retailers or marketing partners (for example, health and fitness, personal care, entertainment and recreation, food and beverages, health and beauty aids, pharmaceuticals, credit cards, banking and financing, and charitable organizations). Participation in these surveys or contests is completely voluntary and you therefore have a choice whether or not to disclose your personal information. If you disclose your personal information, the retailer or marketing partner who is sponsoring the survey or contest will use your personal information for their own marketing purposes and in accordance with their own privacy policies. To opt out of such marketing purposes, you will need to consult the privacy policies of the relevant retailers and/or marketers.

#### **Video Surveillance:**

For safety and security reasons, we may use video surveillance technologies at our properties to monitor the public areas of those properties (for example, parking lots, public areas in malls, and lobby areas). Video images of individuals, including individuals in vehicles, that access our properties, and/or vehicles and license plate numbers may be captured. We will post notices at the point of entry of any such areas where we may use this technology. If you do not wish to have your images and/or images of your vehicle and license plate number captured by us, please do not enter those areas.



*For security purposes, we use video surveillance on our properties, which may include license plate recognition technology.*

We may disclose video surveillance footage to law enforcement or other government agencies where we believe such disclosure is: (i) permitted or required by law; (ii) necessary to protect our properties, visitors, customers or employees; or (iii) reasonable in connection with a law enforcement investigation.

For questions about our use of video surveillance at our properties, please contact our Privacy Officer.

#### **Regulated Disclosures:**

Where permitted by the law, we may disclose your personal information to government agencies in accordance with their statutory authority.

#### **Where is my personal information stored, and how long is it retained?**

Usually your personal information is stored in the jurisdiction in which it was collected. However, Oxford or our service providers and agents may store or access your personal information outside of the jurisdiction in which it has previously been collected, used or disclosed. For example, personal information collected in Ontario may be transferred outside of Ontario and/or Canada. Similarly, personal information collected within the European Economic Area (“EEA”) may be transferred to, and stored at, a destination within or outside of that area. When such transfer takes



*Your personal information may be stored in, transferred to, and accessed from, a variety of jurisdictions.*

place, it may also be processed by staff operating outside of the jurisdiction who work for us or for one of our service providers.

By providing your personal information to us, you agree to the transfer and storage of your personal information, and accept that your personal information may be subject to the laws of those other jurisdictions, and in certain circumstances that the courts, law enforcement agencies, regulatory agencies or security authorities in those other jurisdictions may be entitled to access your personal information.

We retain personal information for only as long as it is needed or as may be required to comply with applicable laws.

### How is my personal information kept safe?

Whether in electronic or paper-based format, we use industry standard technology and efforts to safeguard your personal information from loss, theft and unauthorized access, use or disclosure. These include secure servers and firewalls. Physical access to those areas where information is gathered, processed or stored is restricted to authorized employees who require the information to perform a specific function. Appropriate controls are in place over computer systems and data processing procedures and these controls are reviewed on an ongoing basis to ensure compliance with our security and privacy requirements. When your personal information is no longer necessary, we permanently destroy or erase it.

We require our service providers and agents to protect personal information collected by them on our behalf, or disclosed to them by us.

### How can I access or correct my personal information?

We try to ensure that the personal information we collect about you is accurate, complete and up-to-date. However, we rely on you to provide accurate information in the first instance, and to notify us when there is a change in your personal information. We will not routinely update your personal information and will only do so when such updates are necessary to fulfill the identified purposes. As such, in certain circumstances we may verify personal information, or obtain additional personal information through third-parties.

You have a right, subject to certain exceptions, to access and correct your personal information in our possession or control.

You may access and correct your personal information by writing or emailing our Privacy Officer as described below. There may be an administrative charge for retrieving this information.

### Who can I contact with questions or concerns?

If you have any comments or questions about our Privacy Statement, or if you believe that we have not complied with our Privacy Statement, please contact our Privacy Officer as follows:

Kim Beatty, Privacy Officer  
 900-100 Adelaide Street West  
 Toronto, ON M5H 0E2

e-mail: [privacy@oxfordproperties.com](mailto:privacy@oxfordproperties.com)



*We keep your personal information only as long as it is needed.*



*We use a variety of mechanisms – including physical, technological, and organizational ones – to help keep your personal information secure.*



*We rely on you to help us keep our records accurate, but may occasionally seek external verification.*



*You can access your personal information by making a written request to our Privacy Officer.*



*Our Privacy Officer is ready to respond to your questions and concerns.*