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**SPADINA**  
TORONTO

## *Privacy Policy*

This privacy policy (the “Privacy Policy”) of (“Devron Developments Inc.”, “Devron”, “we,” “us,” or “our,”) privacy practices regarding information we collect from persons or entities (“you” or “your”) who access our property’s Devron Developments Inc. website(s) or our related mobile applications that may be available for download (collectively, the “Site”). To access the Privacy Policy of Devron Developments Inc., please visit: [www.Devron.com](http://www.Devron.com).

### **PURPOSE.**

The purpose of this Privacy Policy is to inform you about the types of information we gather about you, including information gathered when you visit the Site, and information we may receive from third parties or affiliates in addition to that online information, how we may use that information, whether we disclose that information to anyone, and the choices you have regarding our use of, and your ability to correct, the information. Devron strives to help visitors of the Site protect their privacy while using our Site.

THE SITE IS NOT INTENDED FOR CHILDREN AND DEVRON DOES NOT KNOWINGLY SOLICIT OR COLLECT PERSONAL INFORMATION ON THE SITE FROM CHILDREN UNDER THE AGE OF 13. IF DEVRON LEARNS THAT A CHILD UNDER THE AGE OF 13 HAS SUBMITTED PERSONALLY IDENTIFIABLE INFORMATION TO DEVRON THROUGH THE SITE, IT WILL TAKE REASONABLE MEASURES TO DELETE SUCH INFORMATION FROM ITS RECORDS AND TO NOT USE SUCH INFORMATION FOR ANY PURPOSE (EXCEPT WHERE NECESSARY TO PROTECT THE SAFETY OF THE CHILD OR OTHERS, AS REQUIRED BY LAW, OR AS MAY OTHERWISE BE REQUIRED BY LAW).

YOUR CONSENT AND POLICY CHANGES. PLEASE READ THIS ENTIRE PRIVACY POLICY CAREFULLY. BY USING THE SITE, YOU EXPRESSLY CONSENT, WITHOUT QUALIFICATION, TO THE COLLECTION, USE AND DISCLOSURE OF INFORMATION, INCLUDING PERSONAL INFORMATION, AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, YOU ARE NOT AUTHORIZED TO USE THE SITE

Devron may amend this Privacy Policy from time to time. Should the Privacy Policy be modified in any way, the new Privacy Policy will be posted to this webpage. As we may make changes from time to time without notifying you, we suggest that you periodically review the Privacy Policy. By using the Site after the effective date of any modification to the Privacy Policy, you expressly consent, without qualification, to the collection, use and disclosure of information, including Personally Identifiable Information (that you previously provided or later provide), as described in the new Privacy Policy.

### **TYPES OF INFORMATION COLLECTED.**

We collect two types of information: personally identifiable information and non-personally identifiable information. Personally identifiable information is information that identifies you or can be used to identify or contact you (“Personally Identifiable Information”). We also may collect information that by itself typically cannot be used to identify or contact you, such as demographic information (e.g. age, profession or gender), browser types, domain names, internet service providers, referring/exit pages, date/time stamp, operating system, clickstream data, information about you such as how you use the Site and your communication preferences, and other anonymous statistical data involving the use of our Site (“Non-Personally Identifiable Information”).

Personally Identifiable Information we collect may include, but is not limited to: your name, email addresses, postal addresses, postal codes, user Internet Protocol (IP) addresses, social security/insurance number, driver’s license number, prior addresses, monthly rent paid at prior residences, employers, job titles, income, telephone numbers, credit card information, bank account information and routing numbers, date of birth, gender, age, marital status, user name and password (if you choose to become a registered user of the Site or our products and services), emergency contact information, information about your pets, information about your vehicles including license plate numbers, and other information either desirable or necessary to provide quality services to our customers and visitors. We may also collect information about you such as your use of the Site and communication preferences.

You may choose not to provide your Personally Identifiable Information by not entering it on the Site; however, you will not be able to use certain services and features if those services and features require Personally Identifiable Information in order to function.

### **USE OF COOKIES AND OTHER TECHNOLOGIES.**

Like many other website operators, Devron may use cookies to customize content specific to your interests and track your use of the Site. “Cookies” are text files that are placed on your computer and may be used to store your personal information. In addition to cookies, Devron may use other now known or later developed technologies, to assist Devron in observing the behavior of users visiting the Site. These technologies access individual user information but the information is used only to compile aggregated statistics about the Site’s usage.

This Site uses Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. (“Google”), to better assist Devron in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your computer’s IP address. That information will be transmitted to and stored by Google. The information will be used for the purpose of evaluating consumer use of the Site, compiling reports on Site activity for Devron’s use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. The use of cookies by Google Analytics is covered by Google’s privacy policy: <https://www.google.com/policies/privacy/>.

You can choose to delete existing cookies, allow or block all cookies, and set preferences for certain websites in your browser’s settings. Please note you may not be able to use the full functionality of the Site if you choose to block all cookies.

### **HOW WE COLLECT AND USE INFORMATION.**

We may collect information in several ways by your use of this Site, as well as from forms you submit to us, personal correspondence, such as emails or letters that you send to us, information you include in an application you complete on

the Site, information you provide when scheduling a property visit through the Site, or any other activity through which you identify yourself to us. When you visit the Site, our servers may log your IP address, the URL of your request and other information that is provided in the HTTP header. We may also ask you to voluntarily provide us with personal information on this Site. For example, while many of the features of the Site are available without registering, you may be asked to create an account on the Site if you desire to access certain features. Further, in some instances, we may ask you to provide personal information in order to perform screening services. Although you may decline to voluntarily provide Personally Identifiable Information when asked, some features, products and services will be unavailable to you as a result.

Devron may use the information collected from you to provide services which you have requested from us, including, without limitation, enabling you to use the Resident Portal. We may also use your personal information to send you targeted messages, publications, news, and information about events, special offers, promotions and benefits.

#### **EMAIL MANAGEMENT.**

You may receive emails from Devron for a variety of reasons. We respect your desire to manage email correspondence. If you have an account with Devron on the Site, you can select your preferences through your account settings. You can also manage your receipt of certain types of communication by following the instructions included in the email we send you. Please note that, even if you unsubscribe from certain email correspondences, we may still need to email you with important transactional or administrative information.

#### **SHARING OF INFORMATION COLLECTED.**

Except as set forth in this Privacy Policy or as specifically agreed to by you, we will not disclose any information we gather from you on our Site.

We may share with third parties, including, without limitation, our corporate partners, aggregated demographic and statistical information that is not personally identifiable.

*Devron may also disclose an individual's personal information:*

- to a person who in the reasonable judgment of Devron is seeking the information as an agent of the individual;
- in situations where sharing or disclosing your information is required in order to offer you products or services you desire;
- to a third party or parties, where disclosure is required or permitted by law, a judicial proceeding, a criminal investigation, a court order, or legal process;
- if, in the reasonable judgment of Devron, it is necessary to enforce compliance with our internal policies or the Terms of Use, to prevent illegal activity or suspected fraud, or to protect our Site, customers, or others; and
- to any other entity that acquires all or a portion of our organization by merger, reorganization, operation of law, or a sale of some or all of Devron's assets.

Devron may be required to use or disclose your information in connection with a legal action or other proceeding, including without limitation, in response to a court order or a subpoena/summons. We also may disclose such information in response to a law enforcement agency's request.

#### **HOW WE STORE YOUR INFORMATION.**

Devron is committed to protecting the security of any personal information you provide to us. We maintain commercially reasonable safeguards to maintain the security and privacy of personal information that you provide to us. In spite of these protections, Devron cannot guarantee the security of any data submitted over the Internet. After your information reaches Devron, however, it is protected by procedures and technology designed to block reasonably foreseeable intrusions by unauthorized third parties. We may store and process your personal information in the United States or Canada or any other country in which we or our agents maintain facilities. By using the Site, you consent to the transfer of your information among these facilities, including those located outside your home country.

#### **THIRD-PARTY WEBSITES.**

This Privacy Policy applies solely to information collected by Devron. This Privacy Policy does not apply to other websites that are accessible through this Site, including but not limited to any third-party websites.

#### **DATA RETENTION.**

In order to provide you with the products and services you request, answer questions you may have about the products and services provided, and for our own accountability to external regulatory bodies, we retain your information for a period deemed reasonable under the circumstances. Information stored is removed, destroyed, or deleted from time to time when it appears we will no longer have a need to contact you. Retention periods may be extended if we are required to preserve your personal data in connection with litigation, investigations and proceedings, or if a longer retention period is required or permitted by applicable law.

#### **ACCESSING, REVIEWING AND CHANGING YOUR PERSONAL INFORMATION.**

You can see, review and change most of your personal information by logging into your account on the Site and editing your Account Profile or by contacting us at the addresses below. If your personal information changes or is inaccurate, you must change it promptly.

There may be circumstances where your personal information is not accessible, reviewable or able to be modified by you through your account. With some exceptions, you have the right to see what personal information we hold about you. We can help you identify what records we might have about you and we will also try to help you understand any information you do not understand. We may need to confirm your identity before providing you with this access, and we reserve the right to charge a nominal fee for such requests. In some cases, we may require that your request to us for access be made in writing. If we cannot give you access, we will tell you within 30 days or as soon as reasonably practicable and provide you with a reason, as best we can, as to why we cannot give you access.

#### **RIGHTS OF INDIVIDUALS.**

Site users who wish to correct, update, change, or erase the information they submit on the Site should be able to go back to the applicable web form or their account to edit their user or organization record. For additional information or problems accessing your information from such page, please contact Devron using one of the methods listed below.

If you consider that we have processed your personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the data protection supervisory authority in your country.

#### **CONTACTING US.**

If you have questions regarding this Privacy Policy or the use of information collected, you can contact us using any of the methods below:

By phone at: 416 471 3706

By email at: [Info@Devron.com](mailto:Info@Devron.com)

In writing at: Attention Privacy Officer

Canada. To the extent it is applicable, this policy is made under the Personal Information Protection and Electronic Documents Act. There are some rare exceptions to the commitments set out above.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes.