

# Oxford Privacy Statement

PRIVACY



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## OUR COMMITMENT TO YOUR PRIVACY

At Oxford, we are committed to preserving the privacy of your personal data. This Privacy Statement elaborates on our commitment and helps provide transparency into our operations as they relate to your personal data.

As we evolve, the way in which we collect, use, and disclose personal data may change. When this happens, we will update our Privacy Statement to reflect the changes and take steps to bring any material updates to your attention. You can review our updated Privacy Statement at any time by visiting our website, <http://www.oxfordproperties.com>, or by requesting a copy from our Privacy Officer.

**This Privacy Statement applies to the collection, use and disclosure of personal data within Oxford, other than to the personal data of Oxford's Employees, prospective employees, or Contractors, which is governed by *OMERS Employee Privacy Statement*.**

### What is personal data?

Personal data – often referred to as “personal information”, “personally identifiable information” or “PII” – is any information relating to an identified or identifiable person. An identifiable person is one who can be identified directly or indirectly from the information, taking into account any other information that Oxford holds or could gain access to (including from public sources).

Personal data that we collect includes your name, contact information, and demographic information. It may also include information on how you use our websites, mobile applications, WiFi and your visits to our properties.

### How is my privacy promoted?

Under the guidance of our Privacy Officer, Oxford monitors and promotes compliance with privacy laws in jurisdictions where we operate, and with 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 or that may result in a risk to the rights or freedoms of an individual. Where required by law, we will provide such notification without undue delay to affected individuals and/or any relevant supervisory authorities.



*Underlying our commitment to privacy is the protection of personal data – information relating to an identified or identifiable person.*



*Because your privacy is important to us, we carefully monitor the collection, use and disclosure of your personal data.*

## Why is personal data collected and what is it used for?

Knowing you helps us understand your needs, allows us to communicate effectively, and provide you with the services you want. Reasons we collect and use your personal data 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;
- determining your eligibility to lease premises managed by Oxford (including evaluating credit standing and matching credit reporting agency information);
- providing you with the services you have requested;
- researching, developing, managing, protecting, and improving our services, including conducting surveys that provide us with feedback;
- administering our gift card program;
- making monthly parking arrangements;
- investigating and settling complaints and claims;
- compiling statistics, conducting market research, and reporting to owners of the buildings we manage;
- conducting market research and/or delivering tailored messages and interest-based advertisements;
- tracking your usage of our websites, including transaction history and patterns;
- monitoring your use of our WiFi while on our properties;
- Using Anonymous Video Analytics (AVA) for the purpose of audience demographics and measurement within our properties for advertising purposes
- using mobile location analytics and other tracking technologies to create reports on customer behaviour such as walking paths, dwell time or heat maps exhibiting busy locations;
- investigating specific transactions or patterns of transactions to detect unauthorized or illegal activities;
- maintaining appropriate business records;
- 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.

Data collection and use practices may vary from jurisdiction to jurisdiction. For more details on how personal data is collected or used in your jurisdiction contact our Privacy Officer.



*We collect, use, and disclose personal data to serve you better and to fulfill our obligations to you and under the law.*



*We may combine personal data that we have about you and apply advanced analytics such as content and sentiment analysis to that data to derive insights that will help us to improve our services.*



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

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

While we strive to be transparent in our collection, use and disclosure of personal data, consent will not always be directly obtained.

However, we will only collect and use your personal data as reasonably necessary for the identified purposes, and only do so where there is a lawful basis. Sometimes this will be on the basis of consent. At other times it will be on the basis of a contractual obligation, legal obligation, our legitimate interests, or vital interests, but in each case only to the extent necessary to fulfill that obligation or interest.

Where we do obtain your consent, subject to legal requirements, it can be withdrawn for Oxford's collection, use or disclosure of your personal data by notifying our Privacy Officer in writing. If you withdraw your consent, this does not affect the lawfulness of any processing that we carried out prior to that withdrawal. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We have set out below further information on our collection, use and disclosure of personal data.

### Information You Provide to Us:

Our use of information you provide to us may include sharing it with our affiliates and service providers who assist us with our business operations. Some of the categories of service providers we use include: information technology providers (such as cloud hosting services and software services), professional services providers (such as auditors, lawyers and consultants), engagement and marketing service providers (such as online analytics service providers and marketing agencies), and financial service providers (such as banks and payment service providers). If our affiliates and service providers handle personal information on our behalf, they are required to protect that personal information and to use it only to provide the services we request.

If you provide us, our service providers, or our agents with personal data 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 data.

### Business Transactions:

We strive to limit collection, use and disclosure of personal data in the course of transactions. However, where reasonably necessary for business transactions, we may collect personal data from, or disclose personal data to third parties. This may include client information for background checks (including criminal and credit checks), or for 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, development or investment.

### Oxford Gift Card Program:

When you purchase an Oxford gift card our third-party payments providers will collect and use your personal data in order to process your payment. The providers are prohibited from using your personal data for any other purpose and is required to comply with applicable privacy law. When you register, use and/or check your



*Whenever we collect, use, and disclose your personal data, there is a lawful basis for doing so.*



*We strive to limit collection, use and disclosure of personal data in the course of transactions.*



*When you purchase/use an Oxford gift card, enter a survey or contest, or use our websites,*

balance on an Oxford gift card, your personal data may be controlled by the card issuer 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 data. It is, therefore, important that you familiarize yourself with the privacy policies of these third parties before providing them with your personal data.

*your personal data may be collected, used, or disclosed.*

### **Website(s):**

Use of our website(s) is subject to our policies and procedures.

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 data, so it is important to familiarize yourself with their privacy policies before providing them with your personal data.

From time to time our website(s) and social media channels will request personal data 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 data. If you disclose your personal data, the retailer or marketing partner who is sponsoring the survey or contest may be permitted to use your personal data 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 and common 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 safety and security purposes, we use video surveillance on our properties, which may, in some jurisdictions, 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 or required by the law, we may disclose your personal data to government agencies in accordance with their statutory authority.

**Where is my personal data stored and how long is it retained?**

Oxford or our service providers and agents may transfer, store or access your personal data outside of the jurisdiction in which it has previously been collected, used, or disclosed. For example, personal data collected in Ontario may be transferred outside of Ontario and/or Canada. Similarly,, personal data collected in EEA or UK may be transferred to Canada on the basis of the European Commission's adequacy decision relating to Canada or under an agreement based on standard contractual clauses that have been approved by the European Commission for the transfer of data from the EEA (a copy of which is available through OMERS Privacy Officer).It may also be processed by staff operating outside of the jurisdiction who work for us or for one of our service providers.



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

When this transfer takes place, personal data may be subject to the laws of those other jurisdictions, and in certain circumstances, the courts, law enforcement agencies, regulatory agencies or security authorities in those other jurisdictions may be entitled to access your personal data. However, we will always ensure that your personal data is adequately protected and transferred in compliance with applicable privacy laws. Further information is available on request from our Privacy Officer.

We retain personal data for only as long as it is needed to fulfill the identified purposes or as may be required to comply with applicable laws. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.



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

**How is my personal data kept safe?**

Whether in electronic or paper-based format, we implement appropriate technical and organizational measures to ensure an appropriate level of security, keeping in mind the nature, scope, context and purpose of processing, cost, and the potential risk to you. We use industry standard technology and efforts to safeguard your personal data 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.



*We use a variety of mechanisms – including technical and organizational measures – to help keep your personal data secure.*

We require our service providers and agents to protect personal data processed on our behalf.

**How can I access, correct, transfer or delete my personal data?**

We try to ensure that the personal data 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 data. In certain



*We rely on you to help us keep our records accurate but may*

circumstances we may verify personal data or obtain additional personal data through third parties.

*occasionally seek external verification.*

In some jurisdictions, you have a right to access, correct, transfer or delete your personal data in our possession or control, or to object to our processing of your personal data. This may be done by writing or emailing our Privacy Officer.

### 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:



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

Kim Beatty

Privacy Officer

900 – 100 Adelaide Street West

Toronto, ON M5H 0E2

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

You also have the right to make a complaint at any time to the relevant supervisory authority for data protection and privacy issues.