

# **WILSON, BLANCHARD MANAGEMENT INC. PRIVACY POLICY**

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Wilson, Blanchard Management Inc. provides a broad range of management services to our clients with respect to managing condominium complexes, residential rental complexes and commercial industrial complexes.

The Wilson, Blanchard Management Inc. Privacy Policy is a formal statement of principals and guidelines that we have adopted for the protection of Personal Information we may collect for or on behalf of our clients. Our objective in developing this Privacy Policy is to promote responsible practices in the management of Personal Information in accordance with the provisions of the Personal Information Protection and Electronic Documents Act ("PIPEDA"). This Privacy Policy is organized according to the principals of the Canadian Standard's Associations Model Code, which forms the basis of that law.

## **1. Wilson, Blanchard Management Inc. Privacy Policy**

Wilson, Blanchard Management Inc. recognizes the importance of privacy and the sensitivity of Personal Information. As managers, we have a professional obligation to keep confidential all information we receive within our management-client relationship. We are committed to protecting any Personal Information we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

## **2. Your Privacy Rights**

From January 1, 2004, all businesses engaged in commercial activities must comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. These obligations extend to property managers and property management firms, including Wilson, Blanchard Management Inc. The Act gives you rights concerning the privacy of your Personal Information.

Wilson, Blanchard Management Inc. is responsible for the Personal Information we collect and hold. To ensure this accountability, we have developed this Privacy Policy, and have trained our managers and support staff about our policies and practices.

## **3. Why Does Wilson, Blanchard Management Inc. Need Personal Information?**

Wilson, Blanchard Management Inc. provides management services to a wide range of clients. We require (some) Personal Information to represent you as your manager; create and maintain client lists; maintain and supervise client accounts; create and maintain financial statements; create and maintain owners' and/or tenants' lists to deal with owners/tenants; produce marketing materials concerning our services and developments in the management industry.

## **4. What Personal Information Do We Collect?**

Personal Information is any information that identifies you, or by which your identity could be deduced. If we did not collect and use your Personal Information, we could not provide you with management services.

Personal Information that we collect includes, but is not necessarily limited to, the following:

- names of owners/tenants and their telephone numbers;
- rental information;
- lists of Directors' names, addresses and telephone numbers;
- financial institution;
- names of your immediate family members.

## **5. How Do We Collect Your Personal Information?**

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible, we collect your Personal Information directly from you at the start of a retainer and in the course of our representation.

Sometimes we may obtain information about you from other sources, for example:

- your insurance company;
- your real estate agent in a property transaction;
- from a government agency or registry;
- your employer;
- your accountant or auditor;
- your law firm;
- other management firms.

## 6. **Consent**

In most cases, we shall ask you to specifically consent, if we collect, use, or disclose your Personal Information. Normally, we ask for your consent in writing, but in some circumstances, we may accept your oral consent. Sometimes, your consent may be implied through your conduct with us.

## 7. **Use of Your Information**

We use your Personal Information to provide management and financial advice and services to you, to administer our clients' time and billing databases, and to include you in any direct marketing activities or about new developments in the management industry, we will not send any further material.

Wilson, Blanchard Management Inc. does not disclose your Personal Information to any third party to enable them to market their products and services. For example, we do not provide our client mailing lists to other management firms or other organizations.

## 8. **Disclosure of Your Personal Information**

Under certain circumstances, Wilson, Blanchard Management Inc. will disclose your Personal Information:

- when we are required or authorized by law to do so, for example, if a court issues a subpoena;
- when you have consented to the disclosure;
- when the management services we are providing to you requires us to give your information to third parties (for example your auditor, your bank, or your lawyer) your consent will be implied, unless you tell us otherwise;
- where it is necessary to establish or collect fees;
- if we engage a third party to provide administrative services to us (such as computer back-up services or archival file storage) and the third party is bound by our privacy policy;
- if we retain other professionals, agents or contractors such as accountants, engineers, lawyers, insurance brokers, etc., to assist us in completing our work for you or to act on your behalf directly;
- if the information is already publicly known.

In these instances, we will only disclose such Personal Information as is required in the circumstances.

## 9. **Updating Your Information**

Since we use your Personal Information to provide management services to you, it is important that the information be accurate and up-to-date.

If during the course of the retainer, any of your information changes, please inform us so that we can make any necessary changes.

## 10. **Is My Personal Information Secure?**

Wilson, Blanchard Management Inc. takes all reasonable precautions to ensure that your Personal Information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- premises security;
- employee training in the storage, safeguarding and use of Personal Information;
- restricted file access to Personal Information;
- deploying technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access;
- internal password and security policies.

If we use the services of any third parties to process or store Personal Information, we will enter into a legal agreement which requires them to protect this Personal Information in a manner acceptable to us. In entering into these legal agreements, we do not transfer any interest in this Personal Information to them. This is done to ensure that the Personal Information delivered to third parties is maintained at a level equivalent to that provided for under this privacy policy.

## 11. **Access to Your Personal Information**

You may ask for access to any Personal Information we hold about you.

Summary information is available on request. More detailed requests which require archive or other retrieval costs may be subject to our normal professional and disbursement fees.

We also reserve the right to confirm the identity of the person seeking access to Personal Information before complying with any access requests. Please submit your access request in writing or e-mail to our privacy officer as identified in paragraph 18.

## 12. **Correcting Errors**

If Wilson, Blanchard Management Inc. holds information about you and you can establish that it is not accurate, complete and up-to-date, we will take reasonable steps to correct it in a timely manner.

### **13. Can I Be Denied Access to My Personal Information?**

In most cases, a client of Wilson, Blanchard Management Inc. will have access to the Personal Information we store about you. However, there may be occasions when your rights to access your Personal Information are denied. As an example, we may be representing a client on a file that involves you in some fashion. In the course of representing their client on this file, we may gather some Personal Information about you. As such, we could also deny access when:

- your rights to access your Personal Information are not absolute;
- denial of access is required or authorized by law (for example, when a record containing Personal Information about you is subject to a claim of legal professional privilege by one of our clients);
- the information relates to existing or anticipated legal proceedings against you;
- when granting you access would have an unreasonable impact on other people's privacy;
- when to do so would prejudice negotiations with you;
- to protect our firm's rights and property;
- where the request is frivolous or vexatious.

If we deny your request for access to, or refuse a request to correct information, we will explain why.

### **14. Can I Request Anonymity?**

Whenever it is legal and practicable, we may offer the opportunity to deal with general inquiries without providing your name (for example, by accessing general information on our website).

### **15. Credit Bureaus**

To help us make credit decisions about clients, prevent fraud, check the identity of new clients and prevent money-laundering, we may on occasion, request information about you from the files of consumer agencies.

### **16. Communicating With Us By E-Mail and/or Fax**

You should be aware that e-mail and fax are not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information or requesting us to respond to you by e-mail.

### **17. Changes to this Privacy Policy**

Since Wilson, Blanchard Management Inc. regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time. These changes will be posted to our website as soon as practical.

### **18. Requests for Information Access and/or Corrections**

If you have any questions, or wish to access your Personal Information, please write to our Privacy Contact at:

Ms. Karen Reynolds  
Wilson, Blanchard Management Inc.  
701 Main Street West  
Suite 101  
Hamilton, Ontario  
L8S 1A2  
T: 905-540-8800  
F: 905-540-4450