

## PRIVACY POLICY



### 1. Scope of the Policy

The purpose of this Privacy Policy (the “**Policy**”) of Petra Ltd., its affiliates and entities of the same group (collectively “**Group Petra**”) is to describe the manner in which Group Petra collects, uses, retains and communicates your Personal Information (as hereinafter defined).

This Policy applies to all the Personal Information collected and processed by Group Petra from or about guests, tenants, service providers or business and/or commercial partners and the users of our website, mobile apps and social media. However, this Policy does not apply to third-party websites or services that may be accessed by clicking on links displayed on the Group Petra website. Group Petra may not be held liable for how such third parties collect, use, retain or communicate your Personal Information; as such, it is important to familiarize yourself with their privacy policies before providing them your Personal Information.

### 2. Definition of “Personal Information”

The term “**Personal Information**” when used in this Policy means all information that can be used to identify an individual, such as, but not limited to, their name, contact information, date of birth, IP address, navigation history, etc.

Generally, professional contact information (such as name, job title, and work address and telephone number) is Personal Information that is not subject to the same obligations. Note that we do not need your consent to collect it, and it is not confidential.

### 3. Collection of Personal Information

When you browse our website or our mobile applications, consult our social media platforms, visit our properties, register to receive our newsletter, enter a contest or promotion, communicate and interact with us, whether in person or through electronic means, we collect, for instance, the following information:

#### 3.1. Personal Information Provided Voluntarily

Certain Personal Information about you (such as your personal contact information) is voluntarily transmitted to us by forms and interactions between you and our website, our social media platforms, our mobile apps and/or our WI-FI as well as through on-site visits of our spaces, while using our services, when you register to our newsletter or when you enter a contest or a promotion.

#### 3.2. Tenant Files

When you wish to rent a space in one of our properties, we can collect, for example, your name, your address, your phone number, your e-mail address, a copy of your ID, your banking information, your references, your insurance information as well as any other information provided in various documents necessary for the evaluation and treatment of your file or which you may provide to us from time to time.

#### 3.3. Electronic/Technical Information

Certain information may be collected automatically through log files and cookies: the type and version of browser and/or computer system the user uses, the IP address, pages consulted and dates of connection to our website.

The information thus consulted enables us to, mainly, establish general statistics including, without limitation, the number of visits on our websites, the duration of visits and the pages consulted and viewed on our websites and/or our social media platforms. You may configure your browser to reject cookies, but certain website pages may no longer work optimally.

### **3.4. Information Collected from Third Parties**

We may collect your Personal Information in the context of a new partnership or a new business relationship and from third parties, particularly in the context of background checks, credit files, criminal records or research and development purposes. Personal Information may also be collected through our service providers such as, for example, web hosting service providers for our property websites, Google, etc.

### **3.5. Video Surveillance**

Group Petra uses video surveillance technologies, sensors or other similar systems that we may use from time to time in the properties under our management in order to monitor the public areas of those properties (for example parking lots, lobby and common areas) and thus ensure the security of individuals and that of the belongings and assets of the properties and tenants. Video images and the voices of individuals who enter our properties as well as license plates of certain vehicles may be captured. If you do not wish to have your voice and images of yourself and of your vehicle and license plates captured by us, please do not enter those areas. A video surveillance footage or similar system may be provided to a law enforcement agency or other competent body if permitted or required by law or for the purposes of a law enforcement investigation.

## **4. Use of Personal Information**

Upon collecting, using and communicating your Personal Information, Group Petra acts reasonably and only collects information necessary for its business. This includes, without limitation, the following uses:

- for general business-related purposes such as to evaluate, establish and maintain commercial relationships, determine rental rates, administer accounts and fulfill contractual obligations;
- determine your eligibility to lease spaces managed by Group Petra (ex.: credit files);
- perform searches, develop and manage services rendered by Group Petra (ex.: via surveys);
- investigating and settling complaints and claims;
- compiling statistics and conducting market research;
- deliver tailored messages and interest-based advertisements;
- track the use of our websites;
- monitor the use of our WI-FI in our properties;
- administer Group Petra's operations, including for regulatory reporting or compliance purposes;
- ensure Group Petra protection against errors, fraud and misconduct; and
- ensure the safety of any person present on our properties.

We collect, use, retain and communicate your Personal Information with your consent or as permitted or required by law.

## **5. Consent**

Generally, by communicating with us and/or doing business with us, you consent to the collection, use, retention and communication of your Personal Information, in accordance with this Policy and, if applicable, the terms and conditions of use of our websites, social media, mobile apps and/or WI-FI.

## **6. Right to Withdraw Consent**

You may withdraw your consent at any time in the circumstances permitted by law by contacting us in the manner described in the section "Consultation and updating of your Personal Information". However, such withdrawal may prevent Group Petra from continuing its business relationship with you or restrict the services it can offer you, but only insofar as such Personal Information is necessary for such purposes.

## **7. Accuracy of Personal Information**

Having accurate information is essential for Group Petra to properly conduct its business. Group Petra takes reasonable steps to ensure that the Personal Information it collects, uses, retains and discloses is accurate. Group Petra may contact persons who have provided Personal Information to verify its accuracy or refuse to accept information that does not meet legal requirements or take other measures deemed necessary to ensure the accuracy of the information.

Notwithstanding the foregoing, insofar as you have provided us with Personal Information, we will assume that such information is accurate and up to date. Should any of your Personal Information change during our business relationship, we expect you to inform us of such changes so that we may update your file.

## **8. Communication and Retention of Personal Information**

Group Petra may communicate Personal Information in accordance with the law and, for instance, as follows:

- (i) to its employees, advisors, mandataries and representatives;
- (ii) to affiliated entities or of the same group;
- (iii) to public bodies where required or mandated by law;
- (iv) to services providers to, among other things, provide services for and on behalf of Group Petra;
- (v) to any business partner, for example, following your participation in a contest via our website or social media platforms;
- (vi) to any hypothecary creditor or financial institution with respect Group Petra's regular business activities to comply with contractual obligations; and
- (vii) to a third party wishing to acquire any rights and interests of Group Petra or the entities it represents in connection with a sale of a property or any other commercial transaction.

In all of the above cases, your information will continue to be protected by applicable privacy laws.

We may also communicate your Personal Information where required by law, regulation, court order or search warrant and to respond to a government investigation or any other lawful request. We may also communicate your Personal Information to our accountants, auditors, agents and lawyers to enforce or protect our rights. In addition, we may communicate certain Personal Information when we believe it is necessary to do so for our safety or that of our properties, insofar as provided or permitted by law.

Your Personal Information is processed and retained in Quebec. Should a transfer of Personal Information outside Quebec be necessary, such transfer will only take place if it is deemed that the Personal Information would be adequately protected in accordance with the law. Such transfer will also be subject to appropriate contractual agreements to ensure adequate protection in compliance with privacy laws.

## **9. Retention and Protection of Personal Information**

Except as otherwise required by law, your Personal Information is retained and used only as long as necessary to fulfill the purposes for which it was collected, including fulfilling our legal, accounting or reporting obligations to the appropriate governmental and regulatory authorities. Group Petra uses various policies to protect Personal Information in its possession including, without limitation, a policy of retention, digitization and destruction of Personal Information which contains a retention schedule.

In certain circumstances, we may anonymize your Personal Information so that it can no longer, at any time and irreversibly, be associated with you. We reserve the right to use such anonymous data for serious and legitimate purpose, without further notice or consent from you.

Our employees and any other person who may have access to your Personal Information are required to keep it confidential. We undertake to keep the information confidential through physical means such as locked offices, as well as technological solutions such as secure servers and

firewalls. However, because it is impossible to entirely warrant the security of information collected or transmitted online or through other publicly accessible telecommunication systems, know that a certain risk always exists when using electronic means to transmit Personal Information.

#### **10. Minor of Less Than 14 Years of Age**

No Personal Information from a minor of less than 14 years of age is deliberately and knowingly collected, used, retained nor communicated by Group Petra without the prior consent of a parent or a person who has parental authority. Should we be notified that we have collected Personal Information from a minor of less than 14 years of age or less than the legal age in the country where the said minor resides, we shall delete any Personal Information concerning said minor.

#### **11. Consultation and Updating of Your Personal Information**

You may request to have access to the Personal Information we hold about you, or in certain circumstances, ask that we alter, remove or correct certain information in your file. You may also ask to withdraw your consent to our use and communication of your Personal Information by contacting us in one of the following ways:

By mail

PETRA LTD  
8000 Langelier Boulevard, Suite 808  
Montréal (Québec) H1P 3K2

To the attention of: Privacy Officer

By e-mail

[privacy@groupepetra.com](mailto:privacy@groupepetra.com)

#### **12. Complaint**

If you wish to file a complaint, please contact the Privacy Officer, whose contact information is provided in the “Consultation and updating of your Personal Information” section above. We will investigate each complaint and attempt to resolve it.

#### **13. Changes to the Policy**

The present Policy may be changed at any time, at Group Petra’s sole discretion. The changes shall be effective as soon as they appear on our website that you may visit at all times. We will take appropriate steps to bring the changes to your attention, including by indicating the date of the last revised version of this Policy.

#### **14. Comments and Additional Information**

If you have any comments or questions about this Policy, please contact us in one of the ways indicated in the “Consultation and updating of your Personal Information” section above.