

PRIVACY POLICY

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| SOP No: | HR-029-11 | Department: | Human Resources/Compliance |
| Issue Date: | November 19, 2019 | Supersedes: | October 15, 2018 |
| Owner: | HR Director | Approved by: | W. Byrd |

1.0 POLICY:

1.1 The Federal government, to protect personal information, passed the Personal Information Protection and Electronic Documents Act (PIPEDA) which became effective January 1, 2004 for all organizations that collect, use or disclose personal information in the course of their commercial activities. For provinces that have privacy legislation substantially similar to PIPEDA and where required, Skyline will follow those laws instead. Skyline is committed to safeguarding the personal information entrusted to the company by Residents, Investors or Employees.

2.0 PURPOSE:

2.1 To preserve the confidentiality of personal information Skyline collects and the privacy of Residents, Investors and Employees, this policy outlines the procedures to be followed when dealing with such personal, privileged and/or confidential information.

3.0 SCOPE:

3.1 This policy applies to all employees and to anyone who is granted access to personal, privileged and/or confidential information about a Resident, Investor and/or about an Employee.

4.0 RESPONSIBILITIES:

- 4.1 **Employee Responsibilities:** To follow the principles of the Privacy Policy. Furthermore, it is the professional responsibility of all Skyline staff to maintain and keep accurate records.
- 4.2 **Management Responsibilities:** Skyline will not release personal information about present or former Residents, Investors or Employees to outside parties unless requested to do so by the Resident, Investor or Employee or obligated to do so under federal or provincial law.

5.0 PROCEDURE:

5.1 This Privacy Policy has been developed in accordance with the standards set out in PIPEDA and is modeled after the *Canadian Standards Association Model Code for the Protection of Personal Information* (the "**CSA Code**") Accordingly, the ten principles of fair information practices, as identified by the CSA, have been adopted by Skyline and represent a formal statement of the minimum requirements to be adhered to in the collection, use, protection, disclosure and disposal of personal information, including personal information collected from Residents, Investors or Employees.

5.2 TEN PRINCIPLES OF Skyline's PRIVACY POLICY

1. **Accountability:** Skyline is responsible for personal information under its control including personal information that has been transferred by it to a third party for processing and is accountable for compliance with procedures and principles set out in this Privacy Policy. Skyline will use contractual or other

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appropriate means to ensure that a comparable level of protection is provided by third parties to whom Skyline transmits personal information.

1.1 All personal information collected by Skyline or by persons or entities on its behalf, will be protected through physical or electronic measures in order to reduce the risk of its unauthorized collection, use, disclosure, or destruction. Such protections will be appropriate to the sensitivity of the personal information and may include, by way of example:

- (a) passwords;
- (b) multi factor authentication;
- (c) locked cabinets;
- (d) restricted access; and
- (e) file write-protection.

1.2 Skyline will incorporate materials outlining and explaining this Policy and its related procedures into its employee training, communications, and resource programs. Such materials may include but will not be limited to:

- (a) provision of this Policy to employees at time of hire;
- (b) review of this Policy by Human Resources and Compliance Officer(s) once every year and any changes will be communicated to staff;
- (c) posting of this Policy on Skyline websites;
- (d) invitation of ongoing employee comment and review of this Policy; and
- (e) applicable signage in employee common areas.

1.3 All complaints or inquiries regarding the Skyline group of companies; Skyline Enterprises Management Inc. (SEMI); Skyline Real Estate Limited Partnership (SRELP or Skyline Living) Skyline Commercial Management Inc. (SCMI), Skyline Mortgage Financing Inc. (SMFI), Skyline Asset Management Inc. (SAMI), and Skydevco should be directed to:

301 – 5 Douglas Street
Guelph, ON N1H 2S8
ATTENTION: Privacy Officer: Martin Castellan, Co-founder & Chief
Administrative Officer
Fax No. (519) 836-2320
Email: mcastellan@skylineonline.ca

All complaints or inquiries regarding Skyline Wealth Management Inc. (SWMI) should be directed to:

301 – 5 Douglas Street
Guelph, ON N1H 2S8
ATTENTION: Vivian Salonga, Chief Compliance Officer
Fax No. (519) 766-8474
Email: compliance@skylineonline.ca

2. **Identifying Purposes:** Skyline shall identify the purpose for which personal information is collected at or before the time the information is collected.

2.1 Employees collecting personal information from Investors, Residents, other Employees, will accurately explain to such individuals the purposes

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- for which the personal information is being collected, including any purposes that may not be immediately obvious to the individual.
- 2.2 Anonymous or “non-personal” information gathered by Skyline through its websites may be used for technical, research and analytical purposes. Information collected through surveys, existing files and public archives may be used by Skyline to analyze its markets and to develop or enhance service offerings.
3. **Consent:** The knowledge and consent of a Resident, Investor or Employee is required for the collection, use, or disclosure of personal information, except where inappropriate.
- 3.1 In certain circumstances, consent with respect to use or disclosure may be sought after the personal information has been collected but before use (for example, when Skyline wants to use personal information for a purpose not previously identified).
- 3.2 The Consent Principle requires “knowledge and consent”. Skyline will make a reasonable effort to ensure that the individual is advised of the purposes for which the personal information will be used. To make the consent meaningful, the purposes will be stated in such a manner that the individual can reasonably understand how the information will be used or disclosed.
- 3.3 In certain circumstances, personal information may be collected, used or disclosed without the knowledge and consent of the individual. Personal information may also be used or disclosed without the knowledge or consent of the individual in the case of an emergency where the life, health or security of an individual is threatened. Skyline may disclose personal information without knowledge or consent to a lawyer representing Skyline, to collect a debt, to comply with a subpoena, warrant or other court order, or as may otherwise be required or permitted by law.
- 3.4 Generally, the use of products and services by Investors and/or Residents, or the acceptance of employment or benefits by an Employee, constitutes implied consent for Skyline to collect, use and disclose personal information for all identified purposes.
- 3.5 An individual may withdraw consent at any time, subject to legal or contractual restrictions and with reasonable notice. At the time that an individual requests withdrawal, Skyline will inform the individual of the implications of such withdrawal.
4. **Limiting Collection:** Skyline shall limit the collection of personal information to that which is necessary for the purposes identified. Skyline shall collect personal information by fair and lawful means.
5. **Limiting Use, Disclosure, & Retention:** Skyline shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Skyline shall

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retain personal information only as long as necessary for the fulfillment of those purposes.

5.1 Except as required or permitted by law, whenever disclosure of personal information is to be made by Skyline to a third party, the consent of the individual will be obtained and Skyline will take reasonable steps to ensure that such third party has personal information privacy procedures and policies in place that are at least comparable to those implemented by Skyline.

5.2 Skyline has guidelines and procedures with respect to the retention of personal information. Personal information that has been used to make a decision about an individual will be retained long enough to allow the individual access to the information after the decision has been made. Skyline will retain personal information for the length of time as required by legislation.

5.3 Personal information that is no longer relevant or required to fulfill the identified purposes will be destroyed, erased, or made anonymous as soon as reasonably possible.

6. Accuracy: Personal Information shall be as accurate, complete and up to date as is necessary for the purposes for which it is to be used.

7. Safeguards: Skyline shall protect personal information by security safeguards appropriate to the sensitivity of the information.

7.1 The nature of the safeguards will vary depending on the sensitivity of the personal information that has been collected, the amount, distribution and format of the personal information, and the method of storage. More sensitive personal information will be safeguarded by a higher level of protection.

8. Openness: Skyline shall make readily available to Residents, Investors and Employees specific information about its policies and practices relating to the management of personal information.

8.1 Skyline will make information on its policies and practices available in a variety of ways.

9. Individual Access: In most situations, Skyline shall inform Residents, Investors and Employees of the existence, use and disclosure of his or her personal information upon request and shall give the individual access to that information. A Resident, Investor or Employee shall be able to challenge the accuracy and completeness of the information and to have it amended as appropriate.

9.1 In order to safeguard personal information, an Investor, Resident or Employee or other person seeking access may be required to provide sufficient identification information to permit Skyline to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information will be used only for this purpose.

9.2 Skyline will respond to an individual's request within a reasonable time frame and will provide the requested information or make it available in a format that is generally understandable.

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10. Challenging Compliance: Residents, Investors and Employees shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Skyline compliance with the policy.

10.1 Skyline will investigate all complaints concerning compliance with this Privacy Policy. If a complaint is found to be justified, Skyline will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The Investor, Resident, Employee or other individual who provided the personal information will be informed of the outcome, and the changes implemented as a result of the investigation regarding his or her complaint.

6.0 DEFINITIONS:

- 6.1 **“Personal information”** means information about an identifiable individual recorded in any form and includes, but is not limited to, such things as race, ethnic origin, nationality, colour, age, gender, marital status, religion, education, medical information, criminal information, performance reviews, trade union membership, employment and financial history, income, home address and telephone number, e-mail address, numerical identifiers such as social insurance number or driver's license, and views and personal opinions.
- 6.2 With respect to residents and commercial tenants of Skyline properties ("**Residents**"), personal information also includes rental payment history, credit information, billing records and any recorded complaints.
- 6.3 For investors in Skyline Apartment REIT, Skyline Commercial REIT, Skyline Retail REIT, Skyline Mortgage Investment Trust, and Skyline Clean Energy Fund ("**Investors**"), personal information also includes investing history, and financial and credit information.
- 6.4 For employees of Skyline ("**Employees**"), personal information includes information found in personnel files, employment history, performance reviews and medical and benefits information. Personal information does not include the name, title, business address or business telephone number of an employee of an organization. Publicly available information, such as public directory listings of names, addresses, telephone numbers and electronic addresses, however, is not considered personal information.
- 6.5 "**Commercial activity**" means any transaction, act or conduct or any regular course of conduct that is of a commercial character, and specifically states that the selling, bartering or leasing of donor, membership or other fundraising lists constitutes a commercial activity.

7.0 REFERENCES:

- 7.1 *Personal Information Protection and Electronic Documents Act (“**PIPEDA**”)*
- 7.2 *Personal Information Protection Act (“**PIPA**”) – Alberta, British Columbia*
- 7.3 *Loi sur la Protection Des Renseignements Personnels dans le Secteur Prive - Quebec*
- 7.4 *Accessibility for Ontarians with Disabilities Act*



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8.0 HISTORICAL CHANGES:

| Date | Section | Changes made | Edited by |
|-------------------|-------------------------------------|--|--|
| November 1, 2010 | ALL | Approved HR-029-00 | S. Barber-MacMillan |
| Dec 20, 2010 | ALL | Chief Compliance Officer title changed throughout document HR-029-01 | S. Barber-MacMillan |
| March 4, 2011 | ALL | Review and minor edits of document. HR-029-02 | S. Barber-MacMillan Marissa Morettin-Teeter Vivian Salonga |
| December 2, 2011 | 1.1, 1.5, & effective date | Updated company name & reporting responsibilities | D. Kiar, M. Bonneveld |
| January 10, 2012 | 1.1, 1.5, & effective date | Update company name | D. Kiar |
| June 12, 2012 | 1.1, 1.5, Header, effective date | Update new CCO | D. Kiar |
| Jan 30, 2013 | All | Update to new format, revised change in company procedures | D. Kiar |
| July 3, 2013 | 5.3, 6.1.1.3 | Added Commercial REIT & SMFI | D. Kiar |
| Feb 1, 2016 | 6.3 | Added Skyline Retail REIT | D. Kiar |
| June 1, 2017 | 1.1, 1.5, 6.3 | Changed to new CCO | D. Kiar |
| October 15, 2018 | 1.3 | Changed to new compliance person | D. Kiar |
| November 19, 2019 | 1.3 | Changed to CCO | D. Kiar |