

**Privacy**Policy No. **C01.002****Date Issued:** July 2013

At Choice Properties Real Estate Investment Trust (collectively “Choice Properties”, “we”, “me” or “our”) we respect your privacy and take great care in protecting your Personal Information. This Policy demonstrates our commitment to your privacy. Read on to discover how your Personal Information is being protected.

**1.0 Scope and Interpretation**

In this Policy, we explain what Personal Information we collect, and how we use, share and manage it.

**Personal Information**

“Personal Information” as used in this Policy means information about an identifiable individual, such as the name and date of birth of that individual, and includes non-personal information that we link to Personal Information.

**2.0 Consent and Collection**

Unless permitted or required by law, Choice Properties will not collect, use or share Personal Information without first obtaining consent. We will obtain consent when we want to use Personal Information for a new purpose or for purposes other than those stated at the time of collection or in this Policy. Consent can be “express” through words or by specific acts, or “implied” by the conduct of the individual whose Personal Information is being collected, used or shared.

When you interact with us, such as when you visit our websites, we may use, and send to your device or computer, cookies, web beacons, single-pixel gifs and other technologies. We may also record user and usage data, such as where users click on a page, the internet protocol (“IP”) address, operating system, which website or ad the user clicked on to reach our website and which search terms were used, to help us optimize our websites, generate reports, or understand which key words result in visits to our websites. You may delete or disable certain of these technologies, such as cookies, at any time via your browser. However, if you do so, you may not be able to use some of the features of our websites.

You may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Choice Properties will inform you of the implications of withdrawing consent. To withdraw or limit your consent, you can contact us as described below in “Answering Your Privacy Questions”. Please note that it may take some time for all of our records to reflect changes in your preferences.

**3.0 How We Use Personal Information – Purposes**

We identify the purpose for which Personal Information will be used typically at or before the time the Personal Information is collected. Our use of Personal Information is limited to the purposes described in this Policy, those purposes specified at or before the time of collection, or uses that would be reasonable in the circumstances, such as communicating with you and managing our business.

#### 4.0 How We Share Personal Information

We may also share Personal Information about you with other organizations outside of Choice Properties, for example, to help us with our business operations. When Choice Properties shares Personal Information with any such party, we limit the use of such Personal Information to those purposes requested by us and we require that the party has appropriate safeguards for the protection of that Personal Information.

**Other sharing.** Canadian law permits or requires the use or sharing of Personal Information without consent in specific circumstances. These circumstances include situations when required by law or necessary to protect Choice Properties, our employees or others. Should this occur, Choice Properties will not share more Personal Information than is required to fulfill that particular purpose.

**Sale or transfer of business.** From time to time, Choice Properties may share/disclose your personal information in the context of a corporate transaction. If your Personal Information is required in connection with any such transactions, we will require that the parties involved, including affiliates, advisors or other service providers, agree to protect your Personal Information with policies meeting standards equivalent to those set out in this Policy both during and after completion of the transaction.

Choice Properties does not sell, trade or share for financial or other benefit any Personal Information with third parties.

#### 5.0 Retention

##### How We Protect Personal Information

Choice Properties strives to maintain appropriate physical, procedural and technical safeguards so as to prevent loss, misuse, unauthorized access, disclosure, or modification of Personal Information in Choice Properties' custody.

We also seek to ensure that any Personal Information in our custody is as accurate, current and complete as necessary for the purposes for which we use that Personal Information.

##### Where We Keep Personal Information

We store, access and use Personal Information in Canada. Unless there is a legal or regulatory requirement to keep such information in Canada, Personal Information may also be stored, accessed, or used outside of Canada. For instance, when we engage a service provider outside of Canada, Personal Information may be stored, accessed or used in any country where the service provider is located, or from which it provides services, including the United States, India, and the Philippines. Where Personal Information is located outside of Canada, it is subject to the laws of that jurisdiction.

##### How Long We Keep Personal Information

We actively retain Personal Information only as long as it is required for our relationship and a certain period of time afterwards to respond to queries or as required by federal and provincial laws. When this period ends, Personal Information is scheduled for destruction according to our record retention policies. Depending on the nature of the Personal Information and the purpose for which it was collected, this schedule may vary.

#### 6.0 Access and Dispute Resolution

Choice Properties provides a right of access and review in accordance with applicable laws, and will endeavor to provide the Personal Information in question within a reasonable time. You will be asked for identification so that we may verify your identity before providing you with your Personal Information. If you require the documents in an alternative format, we will make reasonable efforts to provide you with your Personal Information in that format. If there will be charges for us to retrieve or provide you with specific information that you have requested, we will advise you of the charges that you would be responsible for and obtain your authorization before proceeding.

Our policy is to respond to access requests as required by applicable laws. Choice Properties may decline access to Personal Information in certain circumstances. These include where the information requested would reveal confidential information or Personal Information about someone else, or if legal or regulatory requirements prohibit providing access or permit not providing access to such information.

If you are concerned about how we treat your Personal Information, please contact the appropriate Privacy Office using the contact information set out below in “Answering Your Privacy Questions”.

If you remain unsatisfied, you may bring the matter to the attention of the appropriate Privacy Commissioner. Some of our activities are subject to the jurisdiction of the Office of the Privacy Commissioner of Canada; other activities are subject to the jurisdiction of the Privacy Commissioner of your province of residence.

## **7.0 Answering Your Privacy Questions**

Choice Properties encourages you to review this Policy periodically. If you have any questions about how we treat your Personal Information, please contact the Privacy Office listed below.

At Choice Properties, we understand the responsibility that comes along with collecting, using and sharing Personal Information. In adopting and adhering to this Policy, we assure you that the Personal Information we collect will be used in an appropriate and responsible manner.

The Privacy Office can be contacted at:

Choice Properties Real Estate Investment  
1 President’s Choice Circle, Brampton, Ontario  
Attention: Privacy Officer  
1-855-416-1244 | [privacy@choicereit.ca](mailto:privacy@choicereit.ca)

