

## **IWS REAL ESTATE MANAGEMENT ULC. PRIVACY POLICY**

This Privacy Policy describes how your Personal Information is collected, used, and shared when you visit or make a purchase from iwsequity.com (the "Site"). A reference to "IWS Real Estate Management ULC.," "we," "us," "our," or the "Company" is a reference to Full IWS Real Estate Management ULC.

### **PROCESSING ACTIVITIES COVERED**

This Privacy Statement applies to the following processing activities:

- Visiting our websites which display or link through to this Privacy Statement;
- Visiting our offices or sales centers;
- Receiving communications from us, including emails, texts or fax;
- Registering for our and attending events;

Our websites may contain links to other websites, applications and services maintained by third parties. The information practices of such other services are governed by the third-party privacy statements, which we encourage you to review to better understand those third parties' privacy practices.

### **PERSONAL INFORMATION WE COLLECT**

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages, services or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as "Device Information."

We collect Device Information using the following technologies:

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- "Sessions" is data stored temporarily in computer memory on our servers during your browsing session and often include an anonymous unique identifier.
- "Log files" track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- "Web beacons," "tags," and "pixels" are electronic files used to record information about how you browse the Site.

Additionally, when you register through the Site, we collect certain information from you, including your first name, last name, email, phone number, city, address, company, how you heard about us, and your interest which we refer to as Registrant Information.

We also collect certain information from you:

- if you express an interest in obtaining additional information about our services, request customer support, use our "Contact Us" or similar features, register to use our websites, sign up for an event or webinar, or download certain content, we generally require you to provide us with your contact information, such as your name, job title, IWS Real Estate Management ULC., address, phone number, email address, or username and password;
- if you visit our offices, you may be required to register as a visitor and to provide your name, email address, phone number, IWS Real Estate Management ULC. and time and date of arrival;

When we talk about "Personal Information" in this Privacy Policy, we are talking both about Device Information and Registrant Information.

### **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

We may use the information we collect through our Websites for a range of reasons, including:

- To provide, operate, optimize, and maintain our Websites.
- To send you information for marketing purposes, in accordance with your marketing preferences.
- For recruitment purposes if you have applied for a role with IWS Real Estate Management ULC.
- To respond to your online inquiries and requests, and to provide you with information and access to resources or services that you have requested from us.
- To manage our Websites and system administration and security.
- To improve the navigation and content of our Websites.
- To identify any server problems or other IT or network issues.
- To process transactions and to set up online accounts.
- To compile aggregated statistics about site usage and to better understand the preferences of our Visitors.
- To carry out research and development to improve our products and services.
- To customize content and layout of the Websites.
- Managing user registrations.
- Promoting security of our websites.
- Handling contact and user support requests.
- Managing event registrations and attendance.
- Developing and improving our websites.
- Managing office and sales center visitors.
- Displaying personalized advertisements and content.

- To carry out other legitimate business purposes, as well as other lawful purposes.

We may also collect information about you from other sources, including third parties from whom we have purchased Personal Data, and combine this information with Personal Data provided by you. This helps us to update, expand and analyze our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. In particular, we collect Personal Data from the following sources:

- Business contact information, including mailing address, job title, email address, phone number, 'intent data' which is web user behaviour data, IP addresses, social handles, LinkedIn URL and custom profiles from third party data providers for the purposes of targeted advertising, delivering relevant email content, event promotion and profiling;

We may combine Personal Information with other information we collect or obtain about you (such as information we source from our third-party partners) to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy.

## **SHARING YOUR PERSONAL INFORMATION**

We share your Personal Information with third parties to help us use your Personal Information, as described above. These include:

- Heroku to host our website--you can read more about how Heroku uses your Personal Information here: <https://www.salesforce.com/company/privacy/>;
- Google Analytics to help us understand how our customers use the Site--you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>;
- We may also share your Personal Information with our contracted service providers which provide services such as IT and system administration and hosting, credit card processing, research and analytics, marketing, customer support and data enrichment.

Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

## **BEHAVIOURAL ADVERTISING**

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising through the following list:

FACEBOOK - <https://www.facebook.com/settings/?tab=ads>

GOOGLE - <https://www.google.com/settings/ads/anonymous>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

## **DO NOT TRACK**

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

## **YOUR RIGHTS**

If you are a European resident, you have the right to access Personal Information we hold about you and to ask that your Personal Information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.

Additionally, if you are a European resident we note that we are processing your information in order to pursue our legitimate business interests listed above. You have the right to restrict our processing of your personal information. Additionally, please note that your information will be transferred outside of Europe, including to Canada and the United States.

## **HOW TO EXERCISE YOUR RIGHTS**

To exercise your rights, please contact us in accordance with the "Contact Us" section below. We try to respond to all legitimate requests within one month and will contact you if we need additional information from you in order to honor your request.

In addition, if you have registered for an account with us, you may generally update your user settings, profile, organization's settings or event registration by logging into the applicable website with your username and password and editing your settings or profile. To update your billing information, discontinue your account, and/or request return or deletion of your Personal Data and other information associated with your account, please contact us.

## **DATA RETENTION**

We may retain your Personal Data for a period of time consistent with the original purpose of collection (see "Purposes for which we process Personal Data and on what legal basis" section above). We determine the appropriate retention period for Personal Data on the basis of the amount, nature, and sensitivity of your Personal Data, the potential risk of harm from unauthorized use or disclosure, and whether we can achieve the purposes of the processing through other means, as well as the applicable legal requirements (such as applicable statutes of limitation).

After expiry of the retention periods, your Personal Data will be deleted. If there is any

information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of the data.

## **SECURITY**

We take precautions including organizational, technical, and physical measures, to help safeguard against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, the Personal Data we process or use.

While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password, limiting access to your devices, and signing out of websites after your sessions. If you have any questions about the security of our websites, please contact us via the “Contacting Us” section below.

## **MINORS**

The Site is not intended for individuals under the age of 18.

## **CHANGES**

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

## **CONTACT US**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at [info@iwsequity.com](mailto:info@iwsequity.com) or by mail using the details provided below:

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