

Condominium First Management Services Ltd. Privacy Policy

January 1, 2004

Condominium First Management Services Ltd. Privacy Policy regarding personal information is based on the Canadian Standards Association (CSA) Model Policy on Privacy of Personal Information and applicable law. The CSA Model Policy represents an industry consensus on best practices in the protection of customer personal information.

Condominium First Management Services Ltd. recognizes the importance of privacy and the sensitivity of personal information. As a property management company, we are committed to protecting any personal information we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

Your Privacy Rights

From January 1, 2004, certain organizations, which are considered to be engaged in commercial activities, must comply with the Personal Information Protection Act, (www.privcom.gc.ca). These obligations extend to many organizations. This Act gives you rights concerning the privacy of your personal information.

Condominium First Management Services Ltd. is responsible for the personal information we collect and hold on behalf of our clients which includes the Condominium Corporations we manage under contract. To ensure this accountability, we have developed this policy, and trained our contractors and staff about our policies and practices.

Why Does Condominium First Need Personal Information?

Condominium First Management Services Ltd. provides a wide range of community and maintenance services and products to our clients and residents within Condominium Corporations. Condominium First collects personal information in order to serve our residents and users better and to improve our understanding of their needs and preferences. We collect personal information for the following purposes:

- (a) to identify you when you contact us;
- (b) to improve our understanding of your needs and preferences;
- (c) to establish and maintain our relationships with you;
- (d) to provide specific and on-going services or products to you;
- (e) to help administer your accounts, services and products provided to you by Condominium First now and in the future;

- (f) to plan for improvements in our ability to serve our clients' needs;
- (g) to provide information and offers related to our services and products;
- (h) to provide information and offers which may be of interest to the Condominium Corporation in complementary services or products we may provide or make available to you;
- (i) to effectively and efficiently manage and develop the provision of services, products and operations;
- (j) to effectively and efficiently manage compliance with the applicable by-laws and other commitments residents make in their Condominium Corporation.; and
- (k) to meet legal or regulatory requirements or in emergency situations.

We also collect personal information so that the information, which we use, shall be as accurate, complete and current as is necessary for the purposes for which it is to be used.

We may use or disclose your personal information for management, analytic, planning or other purposes where the information has been sufficiently aggregated such that any individual cannot be reasonably identified.

Condominium First might acquire or develop relationships with other communities or related community organizations in order to better serve our clients' requirements. In such transactions, personal information generally is one of the transferred or disclosed assets but remains subject to the promises made in any pre-existing Privacy Policy (unless the Condominium Corporation consents otherwise). We may transfer or disclose your information, including personal information, in connection with any acquisition, merger, reorganization or other fundamental change. Your personal information may be accessed by our Customer Care Representatives based in the United States in order to provide you with customer service.

Condominium First will collect your personal information for these purposes and for other purposes that we would inform you of at the time of collection.

In addition to the uses inherent in the list of reasons we collect the information, described above, we may request and use personal information from the Condominium Corporation in connection with your receipt, use of, or participation in, our special events, functions, surveys, forums, subscription registrations, content submissions, requests for suggestions, or additional information (including via email to us), and in connection with other activities, services or resources we make available to you from time to time. You may advise us that you do not wish to receive such information or materials or be invited to such functions ("opt out"). You may choose to opt-out at any time, even after you have provided personal information, by following the procedures we describe below in this Privacy Policy. Please note, however, that if you later opt-out, you will not receive any of the information or benefits that may be associated with such activities, materials or functions.

If you do provide us with personal information for any of these activities, we may use it to conduct our activities described in this Privacy Policy.

We do not disclose the Condominium Corporations and residents personal information to third parties who are not involved in the provision of any specific product or service offering with us and only then in a manner that is consistent with our Privacy Policy, or as regulated by law.

What personal information does Condominium First collect?

Personal information is any information that identifies residents within the Condominium Corporation or by which an individual's identity could be deduced. If we did not collect, use, retain and disclose the personal information of the residents within the Condominium Corporation we could not provide you with services or products.

How does Condominium First collect your personal information?

We collect nonpublic personal information about you that is provided to us by the Condominium Corporation and residents or obtained by us with your authorization or consent. We collect information by lawful and fair means. Wherever possible we collect your personal information directly from you, at the commencement of our relationship and in the course of our relationship.

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

- your insurance company or other benefits provider;
- a third party with whom you have or are seeking to establish a relationship;
- from a government agency or registry;
- your realtor, if we are working with you on the purchase, sale or other transaction involving a home in the Condominium community;

Consent

In most cases, we shall ask the Condominium Corporation and residents to specifically consent, if we collect, use, retain or disclose your personal information. In many cases we may ask for consent in writing, but in some circumstances, we may accept your oral consent. Sometimes, your consent may be implied through your conduct with us.

Choice/Opt-Out

If a Condominium Corporation and owners do not wish to obtain newsletters or materials, be invited to seminars, functions or other events or to be informed about new services and timely developments you have the opportunity to opt-out of receiving such communications or invitations. Condominium First provides the following options for you to opt-out of these communications. You may:

1. E-mail us at condos@condominiumfirst.com; or
2. Telephone us at (403) 299-1810.

Use of Your Information

Condominium First's use of personal information is used in order to service the Condominium Corporations, residents and clients in accordance with our Management Agreement and to provide other services and products, to administer our resident relationships and to include you in any direct marketing activities such as circulation of newsletters or materials, invitations to seminars or other events on current issues, new services or timely developments related to the management of your Condominium Corporation. You may advise us that you do not wish to receive such information or materials or be invited to seminars or functions ("opt out"). You may choose to opt-out at any time, even after you have provided personal information, by following the procedures we describe in this Privacy Policy. Please note, however, that if you later opt-out, you will not receive any of the information or benefits that may be associated with such activities, materials or functions.

Disclosure of your Personal Information

Condominium First does not disclose any non-public personal information about Condominium Corporations, residents or former residents to anyone, except as expressly or impliedly authorized by those residents to enable us to effectuate our relationship with them, or as permitted by law or this policy. Condominium First does not, without your prior consent, disclose your personal information to any third party to enable them to market their products and services to you.

Under certain circumstances, the Corporation will disclose your personal information, such as, for example:

- 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 services we are providing requires us to give your information to third parties (for example where you are involved in a group that also involves others) your consent will be implied, unless you tell us otherwise;
- where it is necessary to establish or collect fees or enforce our by-laws or policies;
- if we engage a third party to provide administrative services to us (such as our management company) and the third party is bound by our privacy policy;
- if the information is already publicly known.

Updating Your Information

Since we use your personal information to provide services and products to residents and users of our facilities, it is important that the information be accurate and up-to-date. If during the course of our relationship, any of your information changes, please inform us so that we can make any necessary changes.

Is the Condominium Corporations' and Residents' Information Secure?

Condominium First retains records relating to the provision of services and products to the Condominium Corporation and residents in order to manage the affairs of the Condominium

community and to comply with our relationships with residents or requirements of the by-laws of the Condominium Corporation. In order to guard your nonpublic personal information, we maintain reasonable physical, electronic, and procedural safeguards. Condominium First takes reasonable precautions to protect 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;
- restricted file access to personal information;
- deploying technological safeguards like security software and firewalls to seek to prevent hacking or unauthorized computer access;
- internal password and security policies.

Access to Your Personal Information

A Resident may ask for access to specific personal information we hold about them. Summary information is available on written request from the resident. More detailed requests, which require archive or other retrieval costs, may be subject to our normal fees and disbursement costs. We will seek to identify these costs to you at the time of your request.

Correcting Errors

If Condominium First holds personal information about you and you can establish that it is not accurate, complete and up-to-date, the Corporation will take reasonable steps to correct it.

Can I be Denied Access to My Personal Information?

A Resident's right to access their personal information is not absolute. Condominium First may and in some cases must deny access when:

- denial of access is required or authorized by law (for example, when a record containing personal information about the resident is subject to a claim of privilege);
- information relates to existing or anticipated legal proceedings against the resident or an investigation involving a resident;
- when granting access would have an unreasonable impact on other people's privacy;
- when to do so would prejudice negotiations with a resident;
- to protect the Corporation and our residents' rights and property;
- where the request is frivolous or vexatious.

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

The Corporation does not use Social Insurance Numbers as a way of identifying or organizing the information we hold upon a resident.

Alberta Land Titles Information

To help us confirm a new resident, we may on occasion, request information from Alberta Land Titles about you.

Communicating with Us

If you would have any questions regarding the Privacy Policy send an e-mail to condos@condominiumfirst.com

If you would like to contact us with feedback or questions, you may:

- E-mail us at condos@condominiumfirst.com or
- Telephone us at (403) 299-1810.

Any personal information (name, email address, phone number) you provide will be used to help us contact you on your issue.

Your comments and questions will be retained and used for service enhancements.

Please include your name and e-mail address in the body of the message.

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

Can Condominium First Revise This Privacy Policy?

Due to the rapidly evolving privacy developments and because Condominium First regularly reviews all of its policies and procedures, Condominium First may change its Privacy Policy from time to time.

Requests for Access

If you have any questions, or wish to access your personal information, please write to our Privacy Officer at:

Condominium First Management Services Ltd.

810, 839 – 5 Avenue SW

Calgary, AB T2P 3C8

Attention: Linda Grey-Martin

General Manager

If you are not satisfied with our response, the Information and Privacy Commissioner can be reached at:

410, 9925 - 109 Street,
Edmonton, Alberta T5K 2J8
Phone: (780) 422-6860

Employment Inquiries

If a resident or contractor applies to the Condominium Corporation for employment, the Corporation and Condominium First need to consider your personal information, as part of the review process, unless you ask us not to retain the information. If you are offered employment, which you accept, the information will be retained in accordance with our privacy procedures for employee records.

Condominium First Management Services Ltd.



Condominium First Management Services Ltd.
Donald C. Davies, CPM, FRI, CMA, CRP
President & CEO

January 19, 2012