

PRIVACY POLICY

Last update: September 21, 2022

PREAMBLE

Cominar Real Estate Investment Trust, its subsidiaries and affiliates (hereinafter referred to as "**Cominar**" or "**We**" or "**Us**") outlines below its practices with respect to the management of Personal Information collected on Cominar's web sites or platforms, social media accounts (including but not limited to Facebook, Instagram, Twitter, and LinkedIn) or any mobile applications, if any (the "**Site(s)**").

Accordingly, this Privacy Policy (hereinafter referred to as the "**Policy**") sets out the principles that guide the way we collect, use and disclose Personal Information.

1. DEFINITIONS

"**User**" or "**You**" means an individual who (i) uses our Site; (ii) corresponds in any way with Cominar; (iii) participates in a Cominar survey, contest or promotion; (iv) is a member of a Cominar program, including loyalty, an email list or a newsletter; or (v) accesses, uses or buys any other service offered by Cominar.

"**Collection**" means the action of collecting, acquiring or obtaining Information in any way and by any means whatsoever, including from third parties.

"**Disclosure**" means the act of revealing Personal Information to a third party.

"**Personal Information**" means any personal information that relates to a natural person and allows that person to be identified.

"**Privacy Officer**" means the person referred to in section 10 of this Policy.

2. COLLECTION OF INFORMATION

Type of Personal Information collected

We collect only the Personal Information that is necessary for our business, such as your name, telephone number, email address, postal code and language preference for communication purposes.

Means used for Collection

Cominar may collect information by traditional or technological means. We respect your privacy at all times and use only lawful means to collect your Personal Information.

In order to use certain features of our Site, we may ask you to provide Personal Information. We only collect Personal Information that is necessary to provide you with our various services. Wherever possible, we indicate which fields are required and which are optional.

- If you **use the contact features, such as "Contact", "Inquire Now" or "Maintenance Request"** on our Site, we may collect your name, email address, telephone number, and other relevant information about your request. We use this information to respond to your enquiry or comments. If you send us emails or letters, we may collect Personal Information in a file about you.
- If you **subscribe to a mailing list**, we will collect your name and email address to send you emails about various news and promotions. Even after you have subscribed to one or more newsletters and/or accepted one or more offers to receive marketing and/or promotional communications from us, you may choose to change your preferences by following the "Unsubscribe" link provided at the end of the email or communication received.
- When you **visit our Site**, we may collect information about your visit through cookies and similar tracking technologies.

Unless permitted or required by applicable laws or regulations, we will retain your Personal Information only as long as necessary to fulfill the purposes for which it was collected, including legal, accounting or auditing requirements. Furthermore, Cominar does not sell your Personal Information to any third parties.

3. DISCLOSURE OF PERSONAL INFORMATION

Cominar will only disclose your Personal Information with your consent or if it is legally authorized to do so, including in the following situations:

- Transfer Personal Information to third-party service providers (including affiliates acting in this capacity) that perform services on our behalf, such as data hosting and processing, and to complete transactions.
- In the context of a business transaction, in connection with the proposed or actual financing, securitization, insuring, sale, assignment, or other disposal of all or part of Cominar, or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. Assignees or successors of Cominar, or our business or assets, may use and disclose your Personal Information for similar purposes as those described in this Policy.
- Disclose Personal Information as necessary to meet legal, regulatory, insurance, audit and security requirements, and otherwise with your consent, or as permitted or required by law (including as required by Canadian and foreign laws applicable to us or our service providers). Accordingly, in response to a request from law enforcement or government officials regarding a criminal investigation or suspected illegal activity, we may (and you authorize us to) disclose your name, city, province, telephone number, email address and order history without a subpoena. However, in order to balance your right to privacy with the ability to keep the community free of bad actors, we will not disclose additional information to law enforcement or other government officials without a subpoena, court order or similar legal process, unless the additional Disclosure of Personal Information is necessary to prevent imminent physical harm or financial loss.

4. CONSENT

Pre-Collection consent

By continuing to browse our Site and submitting Personal Information to us through the means listed above, you consent to the Collection, use and Disclosure of your Personal Information in accordance with this Policy.

Refusal to consent

Where a User refuses to consent to the Collection of Personal Information, we endeavour to provide the same services as if they had consented.

However, certain features and services of the Site require the Collection of Personal Information in order to function properly. Thus, it is possible that a User's refusal to consent to the Collection of Personal Information may result in a poorer quality service or a less efficient and/or adapted service. In some cases, services may not be rendered.

Advertising

You can unsubscribe from an advertising subscription at any time by clicking on the "Unsubscribe" link in any advertising email we send you.

You may also opt-out of receiving advertising by contacting the Privacy Officer by email or mail at the address provided in section 10 "**Contact Us**" below.

Cookies and other tracking technologies

When you visit our Site, we use cookies and similar tracking technologies to collect information to remember your preferences and settings as you navigate our Site. The information collected includes: your IP address, the date and time of your visit, the pages you visit, the features you use, the referring URL you came from and the URL you go to next, clickstream behavior (i.e., the pages you view, the links you click, and other actions you take in connection with the Site), your browser type, and the language you select.

Many web browsers allow you to manage your preferences. You can set your browser to refuse cookies or delete certain cookies. You may be able to manage other technologies in the same way that you manage cookies using your browser's preference. In some instances, tracking tools used by third-party service providers may be disabled. For example, Google allows you to deactivate cookies designed to target ads by accessing the [Opt-Out page](#) of its main website. *Google Analytics* may also be deactivated once you download the browser add-on available for that purpose. You may also decline the use of cookies by other third-party vendors by logging on to the *Network Advertising Initiative consumer deactivation page*.

5. USE OF THE INFORMATION COLLECTED

The information collected by Cominar allows us to achieve the following objectives: improve the user experience and promote and/or sell products and services.

The following is a detailed list of the different uses of such information by Cominar:

- To personalize our establishments, our Site and our applications to Users' preferences
- To improve the performance of our Site and our applications provided to Customers
- To distribute information bulletins
- To distribute invitations
- To answer requests for information
- To conduct surveys
- To compile statistics defining our typical User and their preferences
- To conduct market studies
- To provide services and partnerships tailored to our Customers' needs and preferences
- To advertise promotions and programs
- To perform targeted advertising
- To prevent fraud
- Any other required use to achieve the objectives mentioned in the first paragraph of this section
- Any other use to which the Customer expressly agrees

6. INFORMATION HOSTING AND SECURITY

We protect your Personal Information by deploying reasonable technical, physical and administrative security measures to reduce the risk of loss and misuse, or unauthorized access, Disclosure or modification of such Personal Information.

Access

Access to Personal Information held by Cominar is restricted to those employees whose duties require the use of such Personal Information, and only to those subcontractors whose mandate or performance of a contract makes it necessary to use the Personal Information.

Hosting

We may use Canadian companies to securely process or store your Personal Information. These specialized companies deploy Security measures such as secure servers and firewalls.

7. USE BY MINORS

Our Site is not intended for use by persons under 14 years of age. If you are a parent or guardian and believe that we have collected Personal Information about a child under the age of 14, contact the Privacy Officer at the contact information listed in section 10 "**Contact Us**" below.

8. MODIFICATION OF THE POLICY

This Policy is effective as of the date at the top of the Policy. Our Policy may be updated from time to time. We recommend that you review it frequently.

9. RIGHT TO ACCESS, MODIFY OR REMOVE YOUR INFORMATION

In accordance with the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and similar provincial laws, you have the right of access to your Personal Information under certain circumstances. Any request to access, amend or remove your Personal Information must be made in writing and sent to us at the email or postal address listed in section 10 "**Contact Us**" below.

A request for access may be subject to a fee to cover the costs of disclosing the Personal Information we hold about you.

10. CONTACT US

If you have any questions, requests regarding this Policy or complaints, please contact the Privacy Officer by email or mail at:

Att.: Brigitte Dufour

Cominar Real Estate Investment Trust

2820 Laurier Boulevard, Complexe Jules-Dallaire - T3

Suite 750

Quebec City (Quebec), G1V 0C1

Fax: 418 681-2946

confidentialite@cominar.com

If you would like to access your Personal Information, please submit your request **in writing** to the Privacy Officer at the address indicated above and by presenting satisfactory proof of identity and proof of your right of access, as well as details about the kind of information you seek. We will respond to such requests within the time prescribed by law, or in the absence of a prescribed time, within a reasonable time as soon as all this request's relevant documents are received.