

KEYNOTE DEVELOPMENT CORPORATION

Privacy Policy

Keynote Development Corporation (“Keynote”) is committed to safeguarding the personal information entrusted to us by our customers. We manage your personal information in accordance with Alberta’s Personal Information Protection Act and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to Keynote and its affiliates. The policy also applies to any person providing services on our behalf.

What is personal information?

Personal information means information about an identifiable individual. This includes an individual’s name, home address and phone number, age, sex, marital or family status, an identifying number, financial information including credit and credit card information, educational history, etc.

What personal information do we collect?

We collect only the personal information that we need for the purposes of providing our services to our customers, and in some limited cases, as indicated below, for marketing and demographic information purposes. This includes the personal information needed to:

- send a customer or potential customer information or marketing materials in respect of a unit or a project from time to time
- process the purchase of a unit in one of our property developments
- open and manage a customer’s account and to facilitate contact with our customers
- deliver requested products and services
- invoice a customer for any work, material or services in respect of a unit in accordance with any management agreement or by-laws, to process payments in respect of, or to collect unpaid accounts
- make arrangements for the payment of the purchase price of a unit
- prevent fraud
- follow up with customers to determine satisfaction with purchased units
- provide property management services by Keynote
- transition property management services to new property manager
- meet regulatory requirements
- compile aggregated demographic information for marketing and other purposes

We normally collect customer information directly from our customers or a third party sales and marketing team. We may collect your information from other persons with your consent or as authorized by law.

We inform our customers, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don’t provide this notification is when a customer volunteers information for an obvious purpose. An example of

this is when a customer asks us to send them materials on a property development then the information will be used only to contact the individual with those materials on the property development.

Consent

We ask for consent to collect, use or disclose customer personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask customers to provide their consent orally (in person, by telephone), or in writing by signing a consent form or by checking a box on a form.

In cases that do not involve sensitive personal information, we may rely on “opt-out” consent. You can opt out by checking the appropriate box on our relevant forms. We may disclose your contact information to other organizations that we believe may be of interest to you, unless you request that we do not disclose your information. Examples of this are when a customer provides us with information, we may use this information to invoice or collect property management fees.

A customer may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfill our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose customer personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is reasonable for an investigation or legal proceeding, to collect a debt owed to our organization, in an emergency that threatens life, health or safety, or when the personal information is from a public telephone directory.

How do we use and disclose personal information?

We use and disclose customer personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may disclose customer information to credit bureaus to prevent fraud, financial institutions to approve mortgages, or property managers to collect fees from customers with units. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary. We occasionally aggregate personal information to study demographic trends and may provide such aggregated information to third parties for marketing or commercial leasing purposes.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

How do we safeguard personal information?

We make every reasonable effort to ensure that customer information is accurate and complete. We rely on our customers to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible.

In some cases we may ask for a written request for correction.

We protect customer personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying customer personal information, including shredding paper records and permanently deleting electronic records.

We retain customer personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.

Access to records containing personal information

Customers of Keynote have the right to access to their own personal information in a record that is in our custody or under our control, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual. Organizations are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to:

Henry Neufeld
General Manager
102 - 8th Avenue SW
Calgary, AB T2P 1B3

You must provide sufficient information in your request to allow us to identify the information you are seeking. If you do make a request for such access, Keynote has forms specifically for your use, and we request that you use them in order to assist us in identifying what you require.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization.

You may also request a correction of an error or omission in your personal information. We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by Keynote, or about a request for access to your own personal information, please contact:

Henry Neufeld
General Manager
102 - 8th Avenue SW
Calgary, AB T2P 1B3

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta

Suite 500, 640 - 5th Avenue S.W.

Calgary, Alberta T2P 3G4

Phone: (403) 297-2728

E-mail: generalinfo@oipc.ab.ca

Toll Free: 1-888-878-4044

Web site: www.oipc.ab.ca