



Privacy & Security Policy (PSP)

PSP-20210111

January 11, 2021

Privacy and Security Policy

The staff at Property Vista Software Inc. (“Property Vista” or “we”) recognizes the importance of privacy and the sensitivity of personal information. We are committed to protecting personal information we hold in accordance with the law. This Privacy and Security Policy outlines how we manage personal information and safeguard privacy. By accessing our services and/or accessing our website, you acknowledge and fully understand this Privacy and Security Policy and freely consent to the information collection and use practices described in this Privacy and Security Policy.

Personal Information

Personal information means information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization.

Personal Information at Property Vista

Property Vista provides services to a wide range of clients. In doing so, we often collect and use personal information. As well, Property Vista sends individuals information and marketing materials concerning relevant developments in our various service areas.

Collection of Personal Information

We collect personal information fairly and in accordance with the law. Generally, we collect personal information directly from the individuals to whom it relates. Such collection may be done at the start of our relationship with a client or during the course of our relationship.

Sometimes we may obtain information about individuals from other sources including, for example:

- a government agency or registry;
- other service providers who serve our clients

Consent

In most cases, if we collect, use, or disclose personal information, we will obtain consent from the individual to whom it relates. Sometimes we will ask for consent in writing, but in some cases, we may accept oral consent. Sometimes consent may be implied through conduct with

us or the nature of our retainer. Consent that is withdrawn may affect our ability to provide services.

Use of Personal Information

We use personal information to provide services, to administer our client databases, and to include individuals in our information distribution and marketing activities. The preceding includes the following uses: 1) we may share certain aggregated demographic information with our business partners regarding the users of our website(s); 2) we may share certain personally identifiable consumer information with our business partners regarding applicants and other consumers; and 3) we may from time to time communicate service offerings to applicants and other consumers via our co-marketing partners.

Disclosure of Personal Information

Subject to the above provision titled “Use of Personal Information”, we will not disclose personal information we collect from you to third parties without your permission except to the extent necessary including:

- to fulfill your requests for services;
- when the relevant individual has consented to the disclosure;
- when we are required by law to do so, or required by a warrant, a subpoena, or rules of court to do so;
- when the services we are providing require us to give a client’s personal information to third parties, his or her consent will be implied, unless he or she informs us otherwise;
- where it is necessary to protect ourselves from liability or to collect fees or disbursements;
- where the disclosure is in connection with a merger, acquisition or liquidation of our company; or
- if we engage a third party to provide administrative services to us (such as computer back-up services, archival file storage, or insurance) and the third party is bound by obligations regarding privacy that are consistent with this Policy.

Updating Personal Information

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

changes. We may also periodically ask clients to confirm that their personal information is accurate and up-to-date.

Securing Personal and Other Information

Property Vista takes precautions to ensure that personal information is kept safe from loss, unauthorized access, modification or disclosure. The steps taken to protect personal information include:

- securing our premises;
- deploying technological safeguards, such as security software and firewalls to prevent unauthorized computer access or “hacking”; and
- abiding by internal password and security policies.

Property Vista also implements and maintains a comprehensive information security program designed to ensure the security and confidentiality of sensitive data, including but not limited to subscriber codes, security digits, passwords and personal information, and to protect against anticipated threats and unauthorized access to such information.

Disposal of Personal Information

Property Vista is committed to the proper disposal of personal information by taking reasonable measures to protect against unauthorized access to or use of the information in connection with its disposal. For example, upon disposal, Property Vista requires the pulverizing or shredding of papers containing personal information so that the information cannot practicably be read or reconstructed, and the destruction or erasure of electronic media containing personal information so that the information cannot practicably be read or reconstructed.

Monitoring Certain Services

Property Vista may from time to time monitor compliance with established standards by subscribers of certain Property Vista services and ensure that certain information is being used only for permissible purposes allowed under the relevant agreement for service. Property Vista may immediately cease providing all or any such services to any subscriber that is not in full compliance with the preceding. Property Vista or certain Property Vista business partners may also contact consumers to conduct periodic compliance audits or to review an appropriate sample of consumer authorizations and confirm relevant consent(s). Certain data or services may not be provided to the relevant subscriber in the event of non-compliance with the preceding.

Due Diligence regarding Certain Services

In order to ensure that certain data is safeguarded and only provided to companies that have been appropriately verified and credentialed, Property Vista may undertake due diligence on any subscriber of relevant services prior to granting access to such information. Such due diligence may include credit reports. If a credit report is not available or consent to access a credit report is not provided, certain data or services may not be provided to the relevant subscriber. As well, Property Vista may require a subscriber to sign a service agreement prior to certain services being provided to the relevant subscriber.

Using and Matching Certain Numbers

In order to protect sensitive data from the risk of identity theft and other possible fraud, Property Vista may insist that clients facilitate the matching (for verification purposes) of certain numbers or partial numbers which are personal to them, and relevant services may only be delivered upon a successful match of such numbers.

E-mail

E-mail is not an entirely secure medium, and appropriate precautions should be taken when contacting us to send personal or confidential information.

Correcting and Accessing Personal Information

You are entitled to ensure that personally identifiable information in our file is correct and current. You may review this information by contacting us through the methods listed on our website.

An individual may ask for access to personal information we hold about him or her.

Detailed requests entailing archival or other retrieval costs may be subject to our reasonable fees and disbursements (including any actual out-of-pocket expenses).

An individual's rights to access his or her personal information are not absolute. There are a number of situations in which we may deny access. If we deny your request for access to, or refuse a request to correct personal information, we will provide a reason or reasons for doing so.

Website

Our website may contain links to other sites, which are not governed by this Policy.

On our website, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.

When you visit our website, we may track information to administer the site and analyze its usage. Examples of information we may track include: your Internet protocol address; the kind of browser or computer you use; the number of links you click within the site; the state, province or jurisdiction in which you accessed the site; the date and time of your visit; the name of your Internet service provider; the webpage you linked to our site from; and/or pages you viewed on the site.

We may use cookies to personalize or enhance your user experience. A cookie is a small text file that is placed on your hard disk by a webpage server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a Web Server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalize a web page, or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits. Hence, this simplifies the process of delivering relevant content and eases site navigation by providing and saving your preferences and login information as well as providing personalized functionality.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you reject cookies by changing your browser settings, be aware that this may disable some of the functionality on our website.

Changes to this Privacy and Security Policy

Property Vista reviews all of its policies and procedures periodically and we may change this Privacy and Security Policy from time to time.

Requests for Access

Any questions, or any access requests regarding personal information, should be directed in writing to our Chief Privacy Officer at:

January 11, 2021

Chief Privacy Officer
Property Vista
808-3280 Bloor St. W.
Toronto, ON, M8X 2X3

by email to cpo@propertyvista.com; or

by phone to (888) 922-4724.

If our response is not satisfactory, the Privacy Commissioner of Canada can be reached at:

112 Kent Street
Ottawa, ON K1A 1H3
1.800.282.1376.