



Privacy Policy

BlueStone Properties Inc. is firmly committed to the concept of protecting all individuals' personal privacy. In accordance with PIPEDA and the Digital Privacy Act, this Privacy policy discloses our corporate information/data gathering, usage, dissemination and destruction practices.

Lease Applications, Lease Renewals and Related Documents

Lease Applications and all other related requests for information will require potential and current tenants to give us personal, contact and/or financial information. We use the information gathered during the lease applications and lease renewal processes to provide applicants/tenants with information about our products and services, to fulfill the rental application process, to verify an applicant's ability to financially fulfill their rental obligations at time of application and, at time of lease renewal, to facilitate the collection of unpaid rent and in a de-identified form, the information is gathered to create internal occupancy statistics as part of our ongoing marketing efforts. The contact information is also used to reach out to applicants and/or tenants, when necessary.

The information gathered may be forwarded to internal representatives or to third party providers through our secure server connections to complete the lease application or lease renewal processes (i.e. financial credit checks).

We share our tenants' personal emergency contact information with our Building Security and Fire Prevention providers.

Employee Records

Employee personal information is collected to the extent necessary to comply with the law, facilitate payment for work performed, to maintain benefits, for emergencies, to verify employees can complete the core requirements of their positions and, if required, additional medical related information may be requested to facilitate loss time payments, return to work and/or disability accommodation. We do not require employees to provide us with medical diagnoses.

Third Party Access to Information

We will make every effort to ensure all information is secure and only use or share this information to the extent necessary and for its intended purpose.

Only the information necessary in order to process payments, fulfill service delivery requirements (utilities), maintain programs and services, facilitate collection of unpaid rent, maintain building safety and security, as required by law, or in the case of employees, to facilitate payments and maintain programs and benefits will be provided to third parties.



Employees and/or Independent Contractors may be required to submit extensive personal information to BlueStone on behalf of specific corporate tenants to address their security requirements and screening processes for access to tenant premises.

Employees are required to provide BlueStone with express written permission before any information is shared with any third parties, except where required by law.

BlueStone will comply with any subpoena, summons or order/demand issued by any federal, provincial, local law enforcement or judicial agencies for information. We may voluntarily provide unsolicited information to the appropriate authorities if, we believe, the information is relevant to an active criminal investigation. Unless clearly and specifically stated at the point the information is gathered, we do not sell, give away or otherwise share any information about tenants/clients/employees for any purpose other than the purposes mentioned in this document.

Security

BlueStone has security measures in place to protect the loss, misuse and alteration of the information under our control. These measures include the use of property videotaping/surveillance cameras in building common areas, internal security processes, secure servers, storage of data on encrypted devices and with hardcopies being stored in non-public secure areas or in secure offsite storage facilities, and other measures as deemed reasonable and necessary.

Notices advising tenants, employees, contractors, guests or other members of the public of a BlueStone's 24 Hour Video Surveillance policy are posted at external entrances, in all parking facilities and other locations deemed appropriate in the circumstances.

Employees are trained to securely store data, to collect, use, and disclose personal information only as necessary to fulfill their duties, to comply with legal or contractual obligations and in accordance with this policy.

What Personal Information does BlueStone Gather?

We may collect any of the following information for all existing or potential unit occupants, contractors and/or employees with their express consent:

- Name(s) and Birthdates of all occupants
- Tenancy, Employment and/or Business History and intended use of property information
- Business and/or Emergency Contact information, including e-mail address and home phone number
- Income, Banking or other financial Information, including Social Insurance Number and/or list of assets



- Credit/Financial History (personal and/or business)
- Personal Disability Information for special needs' tenants
- Video images of employees, tenants and guests to our buildings
- Personal and Credit Reference Feedback
- Automobile Information, including a copy of the driver's licence and accessible parking permit.

In the case of an emergency where we are unable to contact or locate a tenant, for the tenants' safety, we may be required to reach out to a relative without their express consent.

We require this information to serve you better and to comply with all legal requirements under the Landlord and Tenant Act, the Ontario Fire Code and/or other Employment related regulatory requirements. In particular, for the following reasons:

- Internal record keeping
- To maintain public and internal corporate directories of tenants
- For applicant deposit tracking
- To facilitate the collection of unpaid rent
- To verify your ability to fulfill your financial obligations
- To ensure your safety and security (emergency or service disruption)
- To fulfill our contractual obligation with tenants (special clearances)
- To fulfill our statutory reporting obligations under all federal, provincial and local jurisdictions.

To Access, Correct, Update or to Inquire on the Destruction of Personal Information

You may, at any time, contact BlueStone's Privacy officer to request access to your personal data, correct and/or update the existing data we hold on your behalf.

Personal information will be maintained for all applicants for a period of 6 months, for existing tenants/clients for the length of their tenure, and for past tenants/clients, information for 7 years, or as required by law. Video images are maintained for 60 days. Employee records will be maintained for 7 years or longer, as required by law. Generally, electronic data will be maintained offline indefinitely while hard copy data/information is responsibly destroyed based on the following schedule, except where there is a legal requirement to retain data for a longer period.

- 1) Hard copy tenant data and payment records - shredded 7 years after last date of occupancy
- 2) Video Images - taped over after 60 days
- 3) Hard Copy Employment Records - shredded after 7 years after termination



- 4) Smart Phone memory chips, computer and copier Hard drives - physically destroyed within 60 days of decommission date.

Contacting Us

You may contact us with any questions about this Privacy policy, our practices or dealings with our organization by:

Mail: BlueStone Properties Inc
130 Dufferin Ave, Suite 105
London ON N6A 5R2

E-mail: hr@bluestoneprop.com
Phone: 519-433-0391

Or, by submitting a request using the online request form on our website - www.bluestoneproperties.com