



**VERTICA**

RESIDENT SERVICES

## **Privacy Guidelines**

These *Privacy Guidelines* describe Vertica Resident Services and its affiliates' ("Vertica") commitment to privacy, and explain the principles that guide us in protecting the privacy and confidentiality of personal information.

*Personal information* is information about an identifiable individual. It includes, but is not limited to, name, date of birth, phone number, address, social insurance number (SIN), driver's license number, banking information, income, photographs, and health information.

Vertica, its directors, officers and employees, and its licensed representatives and other persons and organizations who act for, or on behalf of, Vertica, are required to comply with these *Privacy Guidelines*.

Access to personal information is restricted to directors, officers, employees, licensed representatives, and other persons or organizations acting for, or on behalf of, Vertica, and employees of the landlords of the properties that Vertica manages who need the information in order to provide services to the prospective tenants, tenants, or Vertica.

## **Our Privacy Principles**

### **Accountability**

Vertica is responsible for personal information in its control, including information that may be transferred to a service provider performing services for, or on behalf of, Vertica. Vertica has established these *Privacy Guidelines*, and procedures and practices, to safeguard such personal information.

### **Purposes**

Vertica identifies the purposes for which it collects personal information either before or at the time of collection.

### **Consent**

Vertica collects, uses and discloses personal information only with the consent of the individual, or as otherwise allowed by law.

Consent to the collection, use, or disclosure of personal information may be express or implied, as appropriate. Individuals may withdraw their consent at any time, subject to legal or contractual restrictions and considerations.

### **Collection**

Vertica only collects personal information that is necessary for the purposes identified. Personal information is collected directly from the individual, and may, with consent or as otherwise allowed by law, be collected from other sources.

### **Use, disclosure and retention**

Vertica is a Canadian company and most of our business activities take place within Canada. However, in order to deliver a high-level of cost-effective service to our tenants, in certain circumstances we engage third parties to assist us. Personal information is not, without consent, used or disclosed to a third party for any purpose of than that for which it was collected, unless such

use or disclosure is required or allowed by law. This may include use or disclosure in order to protect Vertica's interests in civil proceedings and in proceedings involving criminal activity, fraud or misrepresentation.

Some service providers may be outside of Canada, or use systems, data support, or have employees outside of Canada. We require that our service providers protect your personal information appropriately in a manner consistent with the *Privacy Guidelines* and in accordance with applicable law. We require that service providers collect, use, or disclose your personal information only for purposes that we have authorized. Personal information is subject to disclosure by law enforcement and other authorities where required by law, both inside and outside of Canada.

Vertica retains personal information only as long as necessary to fulfill the identified purpose or as otherwise required or allowed by law.

### **Accuracy**

Vertica uses reasonable efforts to ensure that personal information is accurate and complete for the purposes for which it is to be used.

If your personal information changes, you must promptly notify Vertica so that our systems and records can be updated accordingly.

### **Safeguards**

Vertica protects the security and confidentiality of personal information with safeguards appropriate to the sensitivity of the information.

### **Openness**

Vertica's *Privacy Guidelines* are available to prospective and current tenants, and the public. Upon written request addressed to the Compliance, Vertica Resident Services, we will provide a copy of these Guidelines, and respond to inquiries about our practices relating to personal information.

### **Individual access**

An individual may request to be informed of the existence, use and disclosure of personal information pertaining to him or her. Vertica will provide appropriate access to such information that it holds. If Vertica determines not to provide access to personal information, we will provide an explanation. Individuals may request the correction of personal information that Vertica holds about them, and if we find that what we have is incorrect, we will correct it.

### **Concerns, inquiries or requests**

Any concern, inquiry or request related to privacy should be made in writing.

Send or e-mail to:

Compliance

Vertica Resident Services

33 Yonge Street, Suite 1000,

Toronto, ON, M5E 1G4

[compliance@vertica.ca](mailto:compliance@vertica.ca)