#### PRIVACY POLICY

We want you to know what personal information we collect, why we need your personal information, how such information is protected, where we store such information, and how you can access and correct such information.

Our privacy policy is a promise to you, not just a legal obligation.

### WHAT IS 'PERSONAL INFORMATION'?

Personal information is information about an identifiable individual. There are many types of personal information that we may require in order to serve you better, including the following:

- Your identity or contact information such as name, address, phone number, fax number, and e-mail address
- Your mortgage or financial history when purchasing a home from us,
- Other information incidental to purchasing a home from us (including information about professional advisor's), and
- Information gathered in customer service inquiries, surveys, contests, or inquiries into our products and services.

## WHY DO WE COLLECT, USE, AND DISCLOSE YOUR PERSONAL INFORMATION?

We only collect personal information that is strictly necessary for the purposes outlined in this privacy policy. We collect, use and disclose personal information to serve you better. We ask you for your personal information so that we can:

- Respond to your requests for product or service information.
- Engage in business transactions with you and provide appropriate levels of service following the completion of a transaction.
- Share personal information that we collect with other service providers, such as utilities, warranty providers, insurance companies, banking institutions and credit agencies, as well as trades and contractors, etc. who perform various functions to assist in our delivery of service to you.
- Provide personal information to third parties for legal or regulatory purposes.
- Provide personal information to third parties to perform functions on our behalf,
  such as marketing, data processing, document management, office services, other

technological or administrative services, or customer research (such as to Customer Insight, in order to conduct customer satisfaction surveys).

- Use personal information at an aggregate level to improve the quality and efficiency of our products and services and to enhance our marketing efforts.
- Share your personal information within our enterprise (including our subsidiaries and affiliates) to cross promote products and services which we believe will be of interest to you.
- Distribute newsletters and other informational e-mail communications.

### **HOW DO WE GATHER YOUR INFORMATION?**

We do not use techniques to collect personal information about you without your knowledge. Generally we collect personal information from you directly or from our business partners such as realtors, or lending or mortgage officers. This information could be collected in person, over the telephone, through the mail, or by electronic means.

As you browse <a href="www.tacada.ca">www.tacada.ca</a>, advertising cookies will be placed on your computer so that we can understand what you are interested in. Our display advertising partner, Google Display Network & YP Next Home, then enables us to present you with retargeting advertising on other sites based on your previous interaction on <a href="www.tacada.ca">www.tacada.ca</a>, the techniques our partners employ do not collect personal information such as your name, email address, postal address or telephone number.

## YOUR CONSENT

We only collect, use, or disclose personal information for the purposes we believe you would consider appropriate under the circumstances. Your knowledge and consent are required for the collection, use, or disclosure of your personal information unless permitted or required bylaw. Of course, subject to reasonable and lawful limits, you can choose not to provide us with some or all of your personal information.

However; this choice may prevent us from providing the product, service or information that you requested. We believe you would also expect us to contact you to advise you of new and existing services and benefits that may be of interest to you, and ask your opinion about our current performance through customer satisfaction surveys. From time to time, we will inform you of such services or contact you for your opinions via direct marketing. Direct marketing material is usually delivered to you by mail, telephone or electronic means. Unless you contact us to inform us otherwise, we will consider that you have consented to our continued use and disclosure of your information for these purposes.

You may choose not to receive these offers or surveys and have your name deleted from lists.

We separately request your express consent, or rely on implied consent, in the provision of commercial electronic messages (e-mails, texts and instant messages) to you.

If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at <a href="marketing@tacada.ca">marketing@tacada.ca</a> or via mail [Tacada Head Office, 11504 170th Street, Edmonton, Alberta, T5S 1J7, Canada]

### THIRD PARTIES

Apart from the purposes outlined above, if you allow us to, your name, address and telephone number may be transmitted to trusted third parties in order to inform you of products and services that are offered and that we believe may be of interest to you. We require each such third party to have a policy in place that complies with the requirements of the applicable privacy and anti-spam legislation in Canada. Except as set out in this privacy policy, or as permitted or required by law, we do not sell or disclose any of your personal information to any other organization.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

In particular, remember that certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

## HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION?

Your personal information is stored in secure locations and on secure servers. Your personal information is retained only as long as reasonably necessary for the purposes set out in this privacy policy. When no longer required, we destroy, erase or de-personalize the personal information. Certain legal requirements may necessitate our retaining some or all of the personal information for a specific period of time. We protect your personal

information by using industry standard technology and security safeguards appropriate to the sensitivity of the information, including physical, administrative and electronic controls to minimize the risk of unauthorized access, use or disclosure of or to your personal information. Our employees are trained to appreciate the importance of privacy and confidentiality of personal information and the provisions of this policy apply to them as conditions of their employment. You acknowledge that if any of our third party service providers are located outside of Canada, your personal information may be processed and stored in such jurisdictions.

## **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

You have the right to access your personal information that is in our custody, subject only to certain legal restrictions. We strive to ensure that all information on-hand is accurate and up-to-date. We therefore urge you to provide us with updates regarding your personal information and to inform us of any errors affecting the personal information we hold. Access or correction requests must be in writing and should provide sufficient detail of the nature and scope of your request.

## **ON-LINE PRIVACY PRACTICES**

Cookies - When you access our website, we may use a browser feature called a 'cookie' to collect information such as the type of Internet browser and operating system you use, the domain name of the website from which you came, date and duration of the visit, number of visits, average time spent on our website, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies a browser, but not necessarily the visitor, to our computers each time our website is visited. In addition to the identified purposes described in this privacy policy, we may use this website information and share it with other organizations with whom we have a commercial relationship to measure the use of our website, to improve the functionality and content of the website and to facilitate usage by a visitor. You can reset your browser either to notify you when you have received a cookie or refuse to accept cookies. However, if you refuse to accept cookies, you may not be able to use some of the features available on our website.

**Online Communications** - In order to provide you with a service or information, you may voluntarily submit personal information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, subscribing to a newsletter or a mail or e-mail list, participating in an event, and participating in contests and surveys. We may combine and store personal information about your use of our website and the

online information you have provided with certain other personal information we may have collected.

**Email Communications -** Occasionally, we may send marketing or promotional email communications to you with information that may be useful, including information about our products and services, and other third parties with whom we have a relationship. In this process, we may collect certain information such as the date/time you first opened our email communications, the number of times you open our email communications, the number of click-throughs per article, total click-through activity on the contents of our email communications and compile generally the related statistics. We may combine and store any such information to manage and improve our email communications to you. We will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional emails from us.

**Links -** Our website may contain links to other websites which are provided as a convenience only. You are advised that other third party websites may have different privacy policies and practices than us, and we have no responsibility for such third-party websites.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

#### **FURTHER INFORMATION**

For further information about what your rights are under the Personal Information Protection And Electronic Documents (PIPEDA) Act, please visit the website for the Office of the Privacy Commissioner of Canada at <a href="https://www.priv.gc.ca.">www.priv.gc.ca.</a>

If you have questions about accessing your personal information, our practices surrounding the collection, use and disclosure of your personal information, or this privacy policy, or complaints about how your personal information has been handled, please contact our privacy officer using the contact information below.

To learn more about how your personal information has been handled, please contact our privacy officer using the contact information below.

### CHOICE/OPT OUT

Please contact us to review or remove your information from our database. If you request your account information be deleted from our database, we may maintain information about individual sales transactions for recordkeeping and servicing.

# QUESTIONS ABOUT OUR PRIVACY POLICY

If you have questions about our website and our privacy policy or disclaimer, please feel free to contact <a href="marketing@tacada.ca">marketing@tacada.ca</a>.