

TORONTO FINANCIAL DISTRICT BIA

EXTERNAL PRIVACY POLICY

Approved by Board of Management on April 17, 2019

At the Toronto Financial District Business Improvement Area (the "**FDBIA**"), we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that the FDBIA collects from or about you, how we use, and to whom we disclose that information. Please review this entire document carefully.

The FDBIA has adopted a series of Privacy Policies in order to address the specific privacy concerns of certain groupings of individuals. This Privacy Policy applies to how we collect, use and disclose the personal information of our customers, suppliers and other parties with whom we interact.

PRIVACY POLICY EFFECTIVE FOR CANADA

It is FDBIA policy to comply with the privacy legislation within each jurisdiction in which we may operate. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another. This Privacy Policy covers only those activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Policy applies to you, please contact our Executive Director for more information.

WHAT IS PERSONAL INFORMATION?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than an individual's business contact information when collected, used or disclosed for the purposes of enabling the individual to be contacted in relation to their business responsibilities.

WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect and maintain different types of personal information in respect of the individuals with whom we interact. This may include, for example, your:

- contact and identification information, such as your name, address, telephone number and e-mail address; and
- payment information (including, for example, credit card information).

The FDBIA is engaged in the promotion of economic development in Toronto's financial district by, for example: (i) advocating for the needs of the Financial District, (ii) improving public spaces; and (iii) showcasing daily activity of various thriving businesses. As such, the FDBIA may also collect personal information from individuals participating in and / or impacted by these activities.

As a general rule, the FDBIA collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

From time to time, we may utilize the services of third parties and may also receive personal information

collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

OUR WEBSITE AND SOCIAL MEDIA

We may collect information related to your visit to our website and social media, including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page within our website that is viewed by that IP address and what country you are from. We may use this information to monitor our website and social media performance (such as number of visits, average time spent, page views) and for our other business purposes, such as: (i) customizing certain content that we think you might like based on your usage patterns; (ii) improving our products and services; and (iii) upgrading our website and social media.

In connection with the foregoing, we may place a "cookie" on the hard drive of your computer to track your visit. The cookie acts as an identification card and allows our website to identify you and to record your passwords and preferences. The cookie allows us to track your visit to our website so that we can understand your use of our website so that we can tailor the website to better meet your needs. Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (i) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (ii) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you may not be able to access a number of web pages found on the website.

In addition, we collect the personal information that you submit to our website or social media channels, such as your name, address and any other contact or other information that you choose to provide, for example, by:

- applying for a position with the FDBIA through our website;
- by corresponding with a representative of the FDBIA via e-mail using the hyperlinks created for that purpose;
- subscribing to an email distribution list; or
- entering a contest or promotion conducted by the FDBIA.

Our website and social media may contain links to other websites that may be subject to less stringent privacy standards. If you click on a link to such a third party website, a third party may also place a cookie on your hard drive. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. The FDBIA is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

WHY DO WE COLLECT PERSONAL INFORMATION?

The FDBIA collects personal information to enable us to manage, maintain, and develop our operations, including for example:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested;

- to be able to review the services that we provide to you so that we may: (i) understand your requirements for our services; and (ii) work to improve our services;
- to send you marketing and other promotional materials that we believe may be of interest to you;
- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to create Aggregated Information (as defined below) for the purposes of: (i) meeting our clients' requests; and/or (ii) developing new or improving existing services;
- to be able to comply with your requests;
- to protect the FDBIA against error, fraud, theft, and damage to our goods and property;
- to enable us to comply with applicable laws or regulatory process; and
- any other reasonable purpose to which you consent.

We may share Aggregated Information with third parties for the purposes of managing, maintaining, and developing our operations. For the purpose of this Privacy Policy, "**Aggregated Information**" arises from the compilation, combination and/or analysis of information from multiple sources on an aggregated basis (so as to prevent identification of personal information relating to any one individual) in order to identify or create, for example, trends, benchmarks, reports, summary metrics, predictive algorithms, products and/or services.

HOW DO WE USE AND DISCLOSE YOUR PERSONAL INFORMATION?

We may use and disclose your personal information:

- as permitted or required by applicable laws or regulatory requirements;
- for the purposes described in this Privacy Policy; and
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

We may also use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

WHEN DO WE DISCLOSE YOUR PERSONAL INFORMATION?

We may share your personal information with our employees, contractors, consultants, affiliates, and other parties who require such information to assist us with managing our relationship with you, including: (i) third parties that provide services to us; and (ii) third parties that assist the FDBIA in the provision of services to you.

For example, we may share your personal information from time to time with our third party information technology, data processing and payment processing service providers so that we may operate our business. As a result, your personal information may be collected, used, processed, stored or disclosed in Canada, the United States, EU, Great Britain and certain other jurisdictions. As such, your personal information may potentially be accessible to law enforcement and national security authorities of that jurisdiction.

In addition, personal information may be disclosed or transferred to another party during the course of the grant of a security interest in FDBIA assets, or completion of, all or a part of the FDBIA through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Finally, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of the FDBIA's regular reporting activities to its affiliates;
- to protect the rights and property of the FDBIA;
- during emergency situations or where necessary to protect the safety of a person or group of persons; and
- with your consent.

YOUR CONSENT IS IMPORTANT TO US

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

As we have described above, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

CHOICE/OPT-OUT

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Executive Director using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Executive Director. In certain circumstances, the withdrawal of consent may render us unable to continue to provide products or services where the collection, use or disclosure of your personal information is necessary to provide the product or service.

We assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

HOW IS YOUR PERSONAL INFORMATION PROTECTED?

The FDBIA endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction. Unfortunately, we cannot guarantee complete security: for example, (i) unauthorized access, use, or disclosure, (ii) hardware or software failure, and (iii) other events may compromise the security of your personal information at any time.

The security of your personal information is important to us, please advise our Executive Director

immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

UPDATING YOUR PERSONAL INFORMATION

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

ACCESS TO YOUR PERSONAL INFORMATION

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Executive Director. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Executive Director.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

INQUIRIES OR CONCERNS?

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Executive Director by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

EXECUTIVE DIRECTOR

We have appointed an Executive Director to oversee compliance with this Privacy Policy. The contact information for our Executive Director is as follows:

Toronto Financial District Business Improvement Area
100 King St. W. (First Canadian Place), Suite 5700
Toronto, ON, M5X 1C7
Canada
Attention: Executive Director
E-mail: ghumes@torontofinancialdistrict.com
Telephone: 416-849-3856

REVISIONS TO THIS PRIVACY POLICY

From time to time, we may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Policy on our website (at www.torontofinancialdistrict.com), and we encourage you to refer back to it on a regular basis.

This Privacy Policy was last updated on April 17, 2019.

INTERPRETATION OF THIS PRIVACY POLICY

Any interpretation associated with this Privacy Policy will be made by our Executive Director. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples; therefore where the word "including" is used, it shall mean "including without limitation".

This Privacy Policy does not create or confer upon any individual any rights, or impose upon FDBIA any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.