

## **ALLUVIA REAL ESTATE PRIVACY POLICY**

Alluvia Real Estate (“**Alluvia**”) is committed to maintaining the accuracy, security and privacy of personal information in accordance with applicable legislation. This Privacy Policy is a statement of principles and guidelines concerning the protection of personal information of our clients, service providers and other individuals (“**you**”).

### **CONSENT**

**BY SUBMITTING PERSONAL INFORMATION TO ALLUVIA OR ITS AGENTS, YOU AGREE THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the Chief Privacy Officer of Alluvia as indicated below. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you.**

#### **1. What Personal information do we collect?**

For the purposes of this policy, personal information means information about an identifiable individual. Such information may include your name, home address, telephone number, personal email address, as well as other personal information you may provide to us from time to time.

When visitors leave comments on the site, we collect the data shown in the comments form and also the visitor’s IP address and browser user agent string to help spam detection.

#### **2. Why is personal information collected?**

We collect your personal information for the purposes listed below:

##### **(a) To provide the information or service you requested**

If you are a website visitor (particularly, if you leave a comment or attempt to contact us through the website), we use your name and address in order to respond to you or to provide the service you requested.

##### **(b) To send you information about our services**

From time-to-time and in accordance with applicable legislation, we may send you further information about our services.

##### **(c) Other purposes**

In addition, from time to time, we may use your personal information for the following purposes:

- to detect and protect Hewitt and other third parties against error, fraud, theft and other illegal activity, and to audit compliance with Hewitt policies and contractual obligations;
- to engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving Alluvia;
- as permitted or required by law; and
- for any other purpose to which you consent.

If you would prefer for us NOT to use your information as described above in section 2(b), simply inform us (see “additional information” below).

### **3. Disclosure of personal information**

We may disclose your personal information to the following third parties in the following circumstances:

#### **(a) Disclosure to Service Providers**

We may disclose your personal information to other companies that provide services on our behalf, including our website hosting services provider. We will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

#### **(b) Disclosure to Affiliates**

We may disclose your personal information to any of the companies and business entities that form part of Alluvia Real Estate (i.e. amongst Alluvia Real Estate, its subsidiaries and affiliates) in order to serve you better and to provide you with information about our affiliates' services.

#### **(c) Disclosure in Business Transfers**

Hewitt may be involved in the sale or transfer of some or all of its business. As part of that sale or transfer, Alluvia may disclose your personal information to the acquiring organization but will require the acquiring organization to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy.

#### **(d) Law Enforcement and Legal Disclosure**

Alluvia may disclose your personal information to a government institution that has asserted its lawful authority to obtain the information or where Alluvia has reasonable grounds to believe the information could be useful in the investigation of unlawful

activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and information, or to Alluvia’s legal counsel.

If you would prefer for us NOT to share your information as described above in sections 3(b) or 3(c), simply inform us (see “[additional information](#)” below)

#### **4. Embedded Content from other Websites**

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. The collection, use and disclosure of such other websites is governed by the privacy policy applicable on such website(s).

Upon your written request, subject to certain exceptions, Alluvia will inform you of the existence, use, and disclosure of your personal information and will give you access to that information. Access requests should be sent to the Privacy Officer, using the contact information below.

#### **5. Storage of personal information**

Your personal information is stored in secured locations and on servers controlled by Alluvia or its service providers, located either at our offices or at the offices of our service providers.

#### **6. Protection of your personal information**

To help protect the confidentiality of your personal information, Alluvia employs administrative and technological safeguards appropriate to the sensitivity of your personal information. Where personal information is sent to a third-party for processing, we obtain a commitment from such third-party, that all customer information is kept secure. We operate secure data networks protected by industry firewall and password protection systems.

#### **7. E-Mail Communications**

Occasionally, we may send marketing or promotional e-mail communications to you in accordance with applicable law with information that may be useful, including information about the services of Alluvia. We will not send you any e-mail communications pursuant to this Privacy Policy unless you have consented for us to do so in accordance with applicable law, and we will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future e-mails from Alluvia.

#### **8. Privacy and our Website**

- (a) **Cookies** – When an individual visitor accesses an Alluvia website, we may use a browser feature called a ‘cookie’ to collect information such as the

Internet browser and operating system the visitor uses, the domain name of the website from which the visitor 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 the visitor's browser, but not necessarily the visitor, to our computers each time our website is visited. Unless a visitor specifically informs us (e.g. by registering for an event or sending us correspondence from the website), we will not know who the individual visitors are. In addition to the identified purposes described in our 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. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our website.

- (b) **Online Communications** – In order to provide our website visitors with a service or information, visitors may voluntarily submit personal information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication, participating in a seminar or other event, and participating in contests and surveys. If you are known to Alluvia as a registered user of an online service, we may combine and store personal information about your use of our website and the online information you have provided with certain other online and offline information we may have collected.
- (d) **Links** – Our website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third-party websites may have different privacy policies and practices than Alluvia, and Alluvia has no responsibility for such third-party websites.

## 9. Changes to the Privacy Policy

Alluvia reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our Intranet or website and make such revised policy and changes available upon request to the Alluvia Privacy Officer. However, Alluvia will obtain the necessary consents required under applicable Privacy Laws if it seeks to collect, use or disclose an individual's personal information for purposes other than those to which consent is obtained unless otherwise required or permitted by law.

## 10. Additional information

For information on Alluvia's privacy practices, please contact the Alluvia Privacy Officer as follows: [info@alluvia.ca](mailto:info@alluvia.ca)