

# Oxford Privacy Statement

LEGAL



Kim Beatty  
privacy@oxfordproperties.com



Effective  
May 25, 2018

## OUR COMMITMENT TO YOUR PRIVACY

At Oxford, we are committed to preserving the privacy of your personal data. This Privacy Statement elaborates on our commitment and helps provide transparency into our operations as they relate to your personal data.

As we evolve, the way in which we collect, use and disclose personal data may change. When this happens, we will update our Privacy Statement to reflect the changes and take steps to bring any material updates to your attention. You can review our updated Privacy Statement at any time by visiting our website, <http://www.oxfordproperties.com>, or by requesting a copy from our Privacy Officer.

**This Privacy Statement applies to the collection, use and disclosure of personal data within Oxford, other than to the personal data of Oxford's employees, prospective employees or contractors, which is governed by *OMERS Employee Privacy Statement*.**

### What is personal data?

Personal data – often referred to as “personal information”, “personally identifiable information” or “PII” – is any information relating to an identified or identifiable person. An identifiable person is one who can be identified directly or indirectly from the information, taking into account any other information that Oxford holds or could gain access to (including from public sources).

Personal data that we collect includes your name, contact information, and demographic information. It may also include information on how you use our websites, mobile applications, WiFi and your visits to our properties.

### How is my privacy promoted?

Under the guidance of our Privacy Officer, Oxford monitors and promotes compliance with privacy laws in jurisdictions where we operate, and with internal policies and procedures.

We have established processes for identifying potential privacy breaches and providing appropriate notification of any breaches that may cause real risk of significant harm to an individual or that may result in a risk to the rights or freedoms of an individual. This notification helps maintain accountability to the owners of personal data in our possession and control and allows them to mitigate risk. Where required by law, we will provide such notification without undue delay to affected individuals and/or any relevant supervisory authorities, but not later than within 72 hours of the discovery of the breach.



*Underlying our commitment to privacy is the protection of personal data – information relating to an identified or identifiable person.*



*Because your privacy is important to us, we carefully monitor its collection, use and disclosure.*

## Why is personal data collected and what is it used for?

Knowing you helps us understand your needs, allows us to communicate effectively, and provide you with the services you want. Reasons we collect and use your personal data include the following purposes (the “identified purposes”):

- evaluating, establishing and maintaining commercial relationships (including landlord/tenant relationships), determining rental rates, administering accounts and fulfilling contractual obligations;
- determining your eligibility to lease premises managed by Oxford (including evaluating credit standing and matching credit reporting agency information) and for products and services that may be of interest to you from organizations with whom we have strategic alliances;
- providing you with the services you have requested (for example, newsletters for which you have subscribed);
- researching, developing, managing, protecting and improving our services, including conducting surveys that provide us with feedback on our service standards;
- administering our gift card program;
- making monthly parking arrangements;
- investigating and settling complaints and claims;
- compiling statistics, conducting market research and reporting to owners of the buildings we manage;
- conducting market research and/or providing tailored messages and interest based advertisements;
- tracking website usage, transaction history and patterns, monitoring use of web based digital platforms while on our properties (for example, WiFi hotspots);
- using mobile location analytics and other tracking technologies to create reports on customer behaviour such as walking paths, dwell time or heat maps exhibiting busy locations;
- administering online chats and posts;
- investigating specific transactions or patterns of transactions to detect unauthorized or illegal activities;
- maintaining appropriate business records;
- facilitating business transactions, including evaluating, effecting, monitoring and managing investments;
- responding to your inquiries;
- facilitating safety and security;
- performing functions required or authorized by law; and
- for any other purpose to which you consent.

Data collection and use practices may vary from jurisdiction to jurisdiction. For more details on how personal data is collected or used in your jurisdiction contact our Privacy Officer.



*We collect, use and disclose personal data to serve you better and to fulfill our obligations to you and under the law.*



*The type of personal data we collect about you and the reason for the collection will depend on how you do business or interact with us.*

## Is consent needed for collection, use and disclosure of my personal data?

While we strive to be transparent in our collection, use and disclosure of personal data, consent will not always be directly obtained.

However, we will only collect and use your personal data as reasonably necessary for the identified purposes, and only do so where there is a lawful basis. Sometimes this will be on the basis of consent. At other times it will be on the basis of a contractual obligation, legal obligation, our legitimate interests or vital interests, but in each case only to the extent necessary to fulfill that obligation or interest.

Where we do obtain your consent, subject to legal requirements, it can be withdrawn for Oxford's collection, use or disclosure of your personal data by notifying our Privacy Officer in writing. If you withdraw your consent, this does not affect the lawfulness of any processing that we carried out prior to that withdrawal. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We have set out below further information on our collection, use and disclosure of personal data.

### Information You Provide To Us:

Our use of information you provide to us may include sharing it with our affiliates and service providers (for example, financial institutions, actuaries, consultants, auditors, legal advisors, etc.)

If you provide us, our service providers, or our agents with personal data about another person, you represent that you have all necessary authority and/or have obtained all necessary consents from that individual to enable us to collect, use and disclose that personal data.

### Business Transactions:

We strive to limit collection, use and disclosure of personal data in the course of transactions, and do not exchange client lists as a matter of course. However, where reasonably necessary for business transactions, we may collect personal data from, or disclose personal data to third-parties. This may include information for background checks (including criminal and credit checks), or for proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance, financing or investment.

### Oxford Gift Card Program:

The Oxford gift card program is administered by Amex Bank of Canada and Amex Canada Inc. ("Amex Canada"). When you purchase an Oxford gift card through our website or in person, our third-party payments provider will collect and use your personal data on our behalf in order to process your payment. This provider is prohibited from using your personal data for any other purpose and is required to comply with our privacy practices.



*Whenever we collect, use and disclose your personal data, there is a lawful basis for doing so.*



*We strive to limit collection, use and disclosure of personal data in the course of transactions.*

Please note that when you purchase an Oxford gift card at one of our shopping centres, or when you register, use and/or check your balance on an Oxford gift card, your personal data may be controlled by Amex Canada and/or the specific merchant(s) where you redeem the gift card and not by Oxford. Accordingly, Oxford is not responsible for how these third-parties collect, use or disclose your personal data. It is, therefore, important that you familiarize yourself with the privacy policies of these third-parties before providing them with your personal data.



*When you purchase/use an Oxford gift card, enter a survey or contest, or use our websites, your personal data may be collected, used, or disclosed.*

### **Website(s):**

Use of our website(s) is subject to our policies and procedures.

Through our website(s), we may place a text file called a “cookie” in the browser directory of your computer’s hard drive. A cookie is a small piece of information that a website can store on a web browser and later retrieve. The cookie cannot be read by any website other than the one that set up the cookie. Most browsers can be set to reject all cookies. If you choose to modify your browser in this manner, some pages of our website may not function optimally and you may not be able to use all features of our website in the future.

Our website(s) often provides links to websites that are operated by third-parties not under our control. This Privacy Statement does not describe the privacy policies of any third-party websites or their privacy practices. Oxford is not responsible for how such third-parties collect, use or disclose your personal data, so it is important to familiarize yourself with their privacy policies before providing them with your personal data.

From time to time our website(s) request(s) personal data from users for surveys or contests sponsored by us, our retailers or marketing partners (for example, health and fitness, personal care, entertainment and recreation, food and beverages, health and beauty aids, pharmaceuticals, credit cards, banking and financing, and charitable organizations). Participation in these surveys or contests is completely voluntary and you therefore have a choice whether or not to disclose your personal data. If you disclose your personal data, the retailer or marketing partner who is sponsoring the survey or contest may be permitted to use your personal data for their own marketing purposes and in accordance with their own privacy policies. To opt out of such marketing purposes, you will need to consult the privacy policies of the relevant retailers and/or marketers.

### **Video Surveillance:**

For safety and security reasons, we may use video surveillance technologies at our properties to monitor the public areas of those properties (for example, parking lots, public areas in malls, and lobby areas). Video images of individuals, including individuals in vehicles, that access our properties, and/or vehicles and license plate numbers may be captured. We will post notices at the point of entry of any such areas where we may use this technology. If you do not wish to have your images and/or images of your vehicle and license plate number captured by us, please do not enter those areas.



*For safety and security purposes, we use video surveillance on our properties, which may, in some jurisdictions, include license plate recognition technology.*

We may disclose video surveillance footage to law enforcement or other government agencies where we believe such disclosure is: (i) permitted or required by law; (ii) necessary to protect our properties, visitors, customers or employees; or (iii) reasonable in connection with a law enforcement investigation.

For questions about our use of video surveillance at our properties, please contact our Privacy Officer.

### Regulated Disclosures:

Where permitted or required by the law, we may disclose your personal data to government agencies in accordance with their statutory authority.

### Where is my personal data stored and how long is it retained?

Usually your personal data is stored in the jurisdiction in which it was collected. However, Oxford or our service providers and agents may store or access your personal data outside of the jurisdiction in which it has previously been collected, used or disclosed. For example, personal data collected in Ontario may be transferred outside of Ontario and/or Canada. Similarly, personal data collected within the European Economic Area (“EEA”) or the UK may be transferred to, and stored at, a destination within or outside of that area. When such transfer takes place, it may also be processed by staff operating outside of the jurisdiction who work for us or for one of our service providers.

When this transfer takes place, personal data may be subject to the laws of those other jurisdictions, and in certain circumstances, the courts, law enforcement agencies, regulatory agencies or security authorities in those other jurisdictions may be entitled to access your personal data. However, we will always ensure that your personal data is adequately protected and transferred in compliance with applicable privacy laws. Further information is available on request from our Privacy Officer.

We retain personal data for only as long as it is needed to fulfill the identified purposes or as may be required to comply with applicable laws. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal data so that it can no longer be associated with you, in which case we may use such data without further notice to you.

### How is my personal data kept safe?

Whether in electronic or paper-based format, we implement appropriate technical and organizational measures to ensure an appropriate level of security, keeping in mind the nature, scope, context and purpose of processing, cost, and the potential risk to you. We use industry standard technology and efforts to safeguard your personal data from loss, theft and unauthorized access, use or disclosure. These include secure servers and firewalls. Physical access to those areas where information is gathered, processed or stored is restricted to authorized employees who require the information to perform a specific function. Appropriate controls are in place over computer systems and data processing procedures and these controls are reviewed on an ongoing basis to ensure compliance with our security and privacy requirements.

We require our service providers and agents to protect personal data processed on our behalf.



*Your personal data may be stored in, transferred to, and accessed from, a variety of jurisdictions.*



*We keep your personal data only as long as it is needed.*



*We use a variety of mechanisms – including technical and organizational measures – to help keep your personal data secure.*

## How can I access, correct, transfer or delete my personal data?

We try to ensure that the personal data we collect about you is accurate, complete and up-to-date. However, we rely on you to provide accurate information in the first instance, and to notify us when there is a change in your personal data. In certain circumstances we may verify personal data, or obtain additional personal data through third-parties.

In some jurisdictions, you have a right to access, correct, transfer or delete your personal data in our possession or control, or to object to our processing of your personal data. This may be done by writing or emailing our Privacy Officer.

## Who can I contact with questions or concerns?

If you have any comments or questions about our Privacy Statement, or if you believe that we have not complied with our Privacy Statement, please contact our Privacy Officer as follows:

Kim Beatty, Privacy Officer  
900-100 Adelaide Street West  
Toronto, ON M5H 0E2

e-mail: [privacy@oxfordproperties.com](mailto:privacy@oxfordproperties.com)

You also have the right to make a complaint at any time to the relevant supervisory authority for data protection and privacy issues. For more information, contact our Privacy Officer.



*We rely on you to help us keep our records accurate, but may occasionally seek external verification.*



*Our Privacy Officer is ready to respond to your questions and concerns.*