Privacy Policy

Mordini Residential (and its operating entities) is committed to maintaining the accuracy, security and privacy of personal information in accordance with applicable laws.

This Privacy Policy describes how we collect, use, disclose and protect personal information of our individual tenants, customers, website visitors and other individuals we deal with.

This Privacy Policy does not apply to information that is not personal information.

Mordini Residential's objective is to ensure responsible practices in the collection, use and disclosure of personal information, in accordance with applicable legislation.

Why We Collect Personal Information

- 1. As a landlord, we are required to assess potential tenants for their suitability as tenants and collect the necessary basic information should they become tenants. Like all landlords, we collect, use and disclose personal information in order to serve our clients and their tenants, preserve and manage our clients' property, ensure the safety, security and reasonable enjoyment of the rented premises for each tenant, ensure access to the premises, equipment and services that we have agreed to provide, and to collect rents and other fees.
- 2. We will confirm the information provided, check references and conduct a history check of each prospective tenant. This could include following up with other individuals identified during these inquiries. We, or our agents, may also contact appropriate public sources or a credit agency and/or a consumer reporting service for information about an individual's suitability as a tenant.
- 3. The types of personal information we may collect include name, gender, family status, address, electronic address(es), telephone numbers, income or other identifying information, such as driver's license or date of birth. In addition, images, movements, actions, or other identifiable information about our residents may be captured by video equipment monitoring the common areas at our properties. The purpose of such monitoring is to enhance security, safety and reasonable use and enjoyment by all lawful users of the property.
- 4. Information obtained during a tenancy may be used for purposes of enforcing any term of the Tenancy Agreement and to obtain a consumer report in the event the tenant is in arrears of rent or wishes to renew their Tenancy Agreement.
- 5. Access to Mordini's Website. We do not ask for or collect personal information on visits to our website. We do utilize "cookies". Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. We use cookies to help compile aggregate data about site traffic and site interaction so

- that we can offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.
- 6. We collect the personal information of our employees and prospective employees for recruiting and hiring purposes in order that we can check references and properly administer the employment relationship, including payroll and benefit plans. Our human resources department collects the following employee information: name, address, telephone numbers, work and business information, banking information, Social Insurance Number, driver's license number, dependent particulars, among other information. This information is collected and used for payroll and benefit plans setup, administration, payment and tax remittance, to process any benefit or other claims, such as WSIB or medical related claims, and to comply with applicable employment legislation.
- 7. In addition, images, movements, actions, or other identifiable information about our employees may be captured by video equipment monitoring the common areas at buildings under our management that an employee may visit as part of their duties.

Consent

- 8. Consent to use the personal information supplied by prospective tenants is provided by means of a signature(s) on the "Rental Application" form. By signing the Rental Application, the applicant gives permission to the landlord or its agent to perform credit checks, to contact current and previous employers, landlords and references, or to take any other reasonable steps to assess the Rental Application. Additional consent is granted by signing the Tenancy Agreement, if accepted to become a new tenant.
- 9. Consent to use the personal information supplied by employees and prospective employees is provided by means of the completion of an application for employment and/or acceptance of an offer of employment.
- 10. There may be situations where we collect personal information without the tenant's or employee's express consent, such as in the case of an emergency where we believe the tenant/employee would consent if asked and it is impractical to obtain consent (e.g. information obtained by a relative about an absent tenant, or a building emergency may necessitate entering the suite), access public sources (i.e. government, court or tribunal records) or to investigate a breach of the Tenancy Agreement or contravention of the law.

Disclosure and Retention

- 11. Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as may be permitted or required by applicable law.
- 12. We may provide personal information about tenants or occupants to providers of utilities services and/or commodities (e.g. gas, electricity, water, laundry, telephone, internet and cable TV) to a residential complex so that such suppliers

- may contact those residents regarding building and resident services. We may also disclose personal information to insurers, lenders or prospective purchasers of the properties we own or manage. In all cases, before disclosing information, we will ensure the service provider agrees to comply with Privacy Law and this Policy in its use of any personal information obtained from the landlord.
- 13. We will only disclose personal information as permitted by law. We do not sell or transfer any personal information outside of Mordini Residential other than where explicit reference is made and approval obtained at the time the personal information is provided, or where passing that information to third parties is necessary to provide the information or service requested.
- 14. Where we disclose personal information to a third party, we obligate that third party to use and take steps to protect personal information in a manner consistent with the provisions of this Privacy Policy.
- 15. We have guidelines and procedures in place for the retention and destruction of personal information, considering legal requirements and restrictions. Personal information that has been used to make a decision about an individual will be kept for a reasonable time period so as to permit access to the information by the individual following the decision having been made. Information that does not have a specific purpose, or that no longer fulfils its intended purpose, will be destroyed and/or deleted in a secure manner.

Accuracy of Personal Information

- 16. We will strive to keep personal information complete and up to date as necessary, taking into account its use and the interests of the individual. Personal information will only be updated when necessary to fulfill the purposes specified.
- 17. We can help identify what records we might have about an individual as well as help explain any information that is not understood such as short forms, technical language, etc. We will need to confirm an individual's identity if we do not know who they are, before providing them with this access. We reserve the right to charge a nominal fee for such requests. Assuming we allow review of information relating to the content and accuracy, an individual may request an update to the data, if appropriate.
- 18. If an individual believes there is a mistake in the information that we have on file, they have the right to request a correction although they may be asked to provide documentation. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from the individual on the matter and we will forward that statement to anyone else who received the earlier information.
- 19. We rely on individuals to disclose all material information to us and to inform us of any changes required. With proof of entitlement, a request to correct information in our possession may be made by contacting the Privacy Officer at the address set out below in the section called "Contacting Our Privacy"

- Officer." Personal information relating to tenants is normally available by contacting our management office.
- 20. We may decline access to information that we have under our control for reasons such as the information cannot be disclosed for legal, security or other reasons; or the information would reveal personal information about a third party. If we cannot give access to the information requested, we will tell the person within 30 days, explaining as best we can why we cannot give access to the information. We will only refuse access as authorized by law, and in any event will provide the individual with a written explanation for refusing the request.

Safeguarding Your Personal Information

- 21. We retain personal information for the purposes described in this Privacy Policy. Personal information is stored at our offices in Canada. Access to your personal information is limited to our employees, agents and service providers who need access to perform their job or provide services to us.
- 22. We apply appropriate safeguards to our computer networks and physical files and we restrict access to personal information to those Mordini Residential employees and authorized administrators who need to know that information in order to administer the services we provide. Information is kept at our premises, which are secured by an alarm system when office staff are not present. Information stored electronically is protected by passwords and other data security controls. Banking information provided for the purpose of paying rent or fees by electronic banking is encrypted through software supplied by the banking industry.

Complaints

23. To make a formal complaint about our privacy practices, or for more general inquiries, requests may be made in writing to our Privacy Officer at Mordini Residential, 130-100 William St. W., Oshawa, ON L1G 1K2 The Privacy Officer will acknowledge receipt of the complaint, ensure that it is investigated promptly and provide a formal decision and explanation in writing.

Contact

Request for further information, personal information access or any concerns about how we handle your information with Park should be referred to our Privacy Officer, as follows:

Privacy Officer

Mordini Residential, 130-100 William St. W., Oshawa, ON L1G 1K2

Office: 289-460-1996 rentals@mordini.ca

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