



DES SERVICES INC - PRIVACY POLICY

DES Services Inc. recognizes the need to protect Personal Information in the course of collection, use, or disclosure of the said Personal Information, in accordance with:

- 1) The Condominium Act, 1998 (the "Act"); and
 - 2) The laws of the Province of Ontario regarding the protection of Personal Information.
- DES Services Inc. respects everyone's right to privacy and is committed to protecting those rights.

For this reason, any and all personal information you provide to us, including your name, address, telephone number and email address will not be released, sold or rented to any third-party entities or individuals.

In managing the properties and assets of the Condominium Communities in Portfolio, we may, from time to time, hire other professionals, such as lawyers and accountants, in addition to property management, who may require access to documents. These professionals are required to adhere to the privacy legislation of Ontario as well as the legislation governing their professions and will be required and expected by DES Services Inc. to uphold the privacy of all residents and owners as required by such legislation.

We do our utmost to protect and safeguard all personal information provided, however users of our website are responsible for maintaining the secrecy of any passwords or other account information.

DES Services Inc. is not responsible for the content of external Internet sites.

DEFINITIONS:

i. **"Personal Information"** means information about a unit owner that has been provided by the unit owner or its representative, including Medical Information and/or estate information, about a unit owner. Personal Information may include name, age, unit number, parking number, email address, phone numbers, and/or emergency contact information.

ii. **"Medical Information"** means information pertaining to the health of a unit owner and providing the unit owner/its representatives with estate information: information about a unit owner's living and testamentary intention regarding property and/or personal care.

iii. **“Information”** shall mean any and all forms of Information however stored about an identifiable individual including Personal Information and or other types of Information obtained by way of written notice by the owner, the public domain and/or Security Camera System.

iv. **“Security Camera System”** shall mean the electronic, digital or wireless surveillance system and devices that enables continuous or periodic video recording, observing or monitoring of condominiums’ common elements.

v. **“Storage Device”** refers to a videotape, computer disk or drive, CD ROM, computer chip or other device used to store the Personal Information, recorded data or visual, audio or other images captured by the Security Camera System.

vi. **“Privacy Officer”** refers to an individual or organization which shall be responsible for managing and protecting the Personal Information and Security Camera System obtained and/or utilized by DES Services.

PRIVACY OFFICER

DES Services Inc. assigns Principal Condominium Manager to act as the Privacy Officer for the Corporation. The Privacy Officer may designate an individual to act on his/her behalf, who has signed an oath of confidentiality and has received the necessary training on how to treat personal information. The Principal Condominium Manager, in his/her capacity as Privacy Officer, shall determine the sufficiency of such training and be responsible for ensuring the adequacy of same.

Subject to the disclosure requirements of Section 55 of the Act and Protecting Condominium Owners Act 2015, and under the direction of its Privacy Officer, DES Services Inc. shall:

1. Collect Personal Information from unit owners and residents only as is necessary to manage the affairs of the condominium corporation.

2. Not disclose the Personal Information of any unit owner or resident that is collected except as may be required by any Court, Arbitrator, or Administrative Tribunal or as may be consented to by the unit owner or resident involved; and

3. All Information that is already made public through telephone, other public directories, or social media shall not be part of this Privacy Policy as it is already part of the “public domain”.

For greater clarity, DES Services Inc. and the Privacy Officer are not obligated to obtain consent for the use, disclosure, or collection of Personal Information in its possession for the purposes of fulfilling DES Services Inc.’s obligations under the Act or in respect of Information in the public domain.

Further, DES Services has implied consent to use, disclose, and collect Information for the purposes of fulfilling the obligations and duties of DES Services and the various condominium

Corporation under our management on the basis that every owner, occupant, mortgagee, tenant, lessee, or licensor, related directly or indirectly to the condominium Corporations under our care, are bound to comply with the Act.

VIDEO SURVEILLANCE

DES Services Inc. is cognizant of the privacy provisions of Ontario's Freedom of Information and Protection of Privacy Act (FIPPA) and Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

To the extent that DES Services Inc. is required, from to time, to use video surveillance or participate in the surveillance of condominium Corporation common elements under our care, the following guidelines Office of the Privacy Commission of Canada's Guidelines for Overt Video Surveillance. DES Services Inc. will not participate in surveillance activities that do not strictly adhere to these Guidelines.

- Individuals have the right to know who is watching them and why, what information is being captured and where, and what is being done with the recorded images.
- Clear and understandable notice should be posted indicating where video surveillance is undertaken.
- Information collected through video surveillance should only be used for the purpose that surveillance is being undertaken, or for purposes that are permitted by law.
- Cameras will not be aimed at areas of where people have a heightened expectation of privacy for example washrooms, windows, unit door entrances.

Recorded data is stored in a secure location at the condominium's site and access is granted to a limited number of individuals. No recorded data is stored at DES Services Inc. offices and or on DES Services computers, tablets or phones.

DES Services does not allow the installation of remote monitoring programs on its' computers / tablets / phones.