

## **CML PROPERTIES PRIVACY POLICY**

At CML, we are committed to providing you with exceptional service. As providing this service involves the collection, use and disclosure of some personal information, protecting your personal information is one of our highest priorities.

We collect your personal information in accordance with British Columbia's *Personal Information Protection Act* ("PIPA").

We strive to inform you of why and how we collect, use and disclose your personal information. We do not sell your personal information to anyone and we handle all personal information in a manner that a reasonable person would consider appropriate in the circumstances. If you have any concerns or questions about how we handle your personal information you may contact our Privacy Officer and we will do our best to provide you with answers.

This Privacy Policy, in compliance with PIPA, sets out more detailed principles and practices that we follow in protecting your personal information.

### **1. Collecting Personal Information**

- 1.1 "Personal Information" means information about an identifiable individual. Personal information does not include contact information. "Contact information" means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.
- 1.2 Unless the purposes for collecting personal information is obvious and you voluntarily provide your personal information for those purposes, we will communicate the purposes for which your personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.3 We will only collect your personal information that is necessary to fulfill the following purposes:
  - To understand your property management and real estate needs
  - To enable us to offer you services
  - To enable us to learn and improve our offerings to you
  - To properly and fully respond to your inquiries
  - To verify your identity
  - To verify your creditworthiness if applicable
  - To identify your preferences
  - To meet regulatory requirements
  - To assess suitability for tenancy if applicable
  - To collect and process payments
  - To take measures to enforce strata bylaws and rules

- To take measures to enforce your obligations under a lease agreement
- To contact you in case of emergencies
- To fulfill our contractual requirements to your organization if applicable

## **2. Consent**

- 2.1 We will obtain your consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally or in writing or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and you voluntarily provide us with personal information for that purpose.
- 2.3 Subject to certain exceptions, such as when your personal information is necessary to provide the service or product, or when the withdrawal of consent would frustrate the performance of a legal obligation, you can withhold or withdraw your consent for us to use your personal information in certain ways. Your decision to withhold or withdraw your consent to certain uses of personal information may restrict our ability to provide you with a particular service or product.
- 2.4 We may collect, use or disclose personal information without your knowledge or consent in the following circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law
  - In an emergency that threatens an individual's life, health, or personal security
  - When the personal information is available from a public source (e.g., a telephone directory)
  - When we require legal advice from a lawyer
  - For the purposes of collecting a debt
  - To protect ourselves from fraud
  - To investigate an anticipated breach of an agreement or a contravention of law or strata bylaw
  - As authorized by PIPA

## **3. Using and Disclosing Personal Information**

- 3.1 We will only use or disclose your personal information where necessary to fulfill the purposes identified at the time of collection.
- 3.2 We will not use or disclose your personal information for any additional purpose unless we obtain your consent to do so.
- 3.3 We will not sell your personal information to other parties.

#### **4. Retaining Personal Information**

- 4.1 If we use your personal information to make a decision that directly affects you, we will retain that personal information for at least one year so that you have a reasonable opportunity to request access to it.

#### **5. Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that your personal information is accurate and complete where it may be used to make a decision about you or disclosed to another organization.
- 5.2 You may request a correction to your personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note your correction request in the file and the reasons why the correction was not made.

#### **6. Securing Personal Information**

- 6.1 We are committed to ensuring the security of your personal information in order to protect it from unauthorized access, collection, use, and disclosure.
- 6.2 The following security measures will be followed to ensure that client, customer, member personal information is appropriately protected:
- The use of locking filing cabinets
  - Protecting keys and access devices by providing a separate room under lock
  - The use of user ID's and passwords
- 6.3 We will use appropriate security measures when destroying your personal information such as using a professional shredding service.

#### **7. Providing You Access to Personal Information**

- 7.1 You have a right to access your personal information, subject to limited exceptions that are set out in PIPA.
- 7.2 A request to access your personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell you how we use your personal information and to whom it has been disclosed, if applicable.

- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 An administrative fee may be charged for providing access to your personal information, if it would require extensive efforts on our part. Where a fee may apply, we will inform you of the cost and request further direction from you on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify you in writing, providing the reasons for refusal and the recourse available to you.

## **8. Questions and Complaints**

- 8.1 CML's Privacy Officer is responsible for ensuring our compliance with this policy and PIPA.
- 8.2 You should direct any complaints, concerns or questions regarding our compliance in writing to the Privacy Officer. If our Privacy Officer is unable to resolve the concern, you may also write to the Information and Privacy Commissioner of British Columbia.
- 8.3 Our Privacy Officer can be contacted at:  
272 Lansdowne Street  
Kamloops, BC V2C 1X7

The Office of the Information and Privacy Commissioner of BC can be contacted at:

Mailing address

Office of the Information and Privacy Commissioner for British Columbia

PO Box 9038 Stn. Prov. Govt.

Victoria B.C. V8W 9A4

Location

4th Floor, 947 Fort Street, Victoria BC V8V 3K3

Telephone

(250) 387-5629