

# TRICON'S PRIVACY POLICY

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## **1. Our Privacy Philosophy**

At Tricon Capital Group Inc. (“Tricon”, “we” or “us”) we sincerely value the trust that you have placed in our business. We have adopted this privacy policy (the “Policy”) to affirm our commitment to maintaining the accuracy, confidentiality, and security of personal information. Tricon has many affiliate entities located in different cities and countries, some of which are subject to different laws. This Policy will govern the operations of each Tricon affiliate unless and to the extent a Tricon affiliate has its own independent and separate policy governing personal information which is displayed on such affiliate’s website or is otherwise provided to you by such affiliate, in which case such independent policy shall govern. If and to the extent this Policy is to apply to one of Tricon’s affiliates, the terms “Tricon”, “we” and “us” will be deemed to include such affiliate.

This Policy explains how we collect, use, disclose and safeguard the personal information that you or a third party provide. Providing personal information or authorizing a third party to disclose personal information to us signifies your consent to Tricon’s collection, use and disclosure of personal information in accordance with this Policy. If you provide personal information to us about a third party (for example, the name, address, and other information of an emergency contact) or authorize a third party to disclose personal information to us, you agree that you were authorized to do so.

For the purposes of this Policy, “personal information” means information that can identify an individual directly or through other reasonably available means. “Personal information” does not include business contact information that is used solely for the purpose of communicating or facilitating communication with an individual in relation to their employment, business, or profession. Notwithstanding anything to the contrary herein, the meaning of “personal information” shall be interpreted in a manner that conforms with the minimum requirements of applicable privacy legislation.

***If you have any questions about our Policy please contact Tricon at the addresses set out in Section 6 of this Privacy Policy.***

## **2. Identifying Purposes and Obtaining Your Consent**

Typically, the reasons Tricon collects and uses personal information are reasonably clear or can be reasonably anticipated when you provide the personal information to us. For example, and without limitation, at Tricon, we collect and use personal information so we can: (i) identify and communicate with you about matters relating to our properties and respond to your inquiries; (ii) establish eligibility for tenancy; (iii) assess your creditworthiness; (iv) process payments; (v) properly respond to emergency situations; (vi) ensure the orderly management of properties entrusted to our care; (vii) comply generally with privacy laws and all other applicable regulatory requirements; (viii) manage the common elements of our buildings or properties; (ix) assist you when you contact our customer support services, including to direct your questions to appropriate individuals, to investigate and address any of your concerns, and to improve and monitor our customer support responses; (x) ensure the safety, security and appropriate use of our properties; and (xi) communicate with you regarding investments you have made.

We may also use your personal information to provide you with information on upcoming opportunities, properties, products, services or opportunities we reasonably believe would be of interest to you.

We may use your personal information to communicate with you and to perform activities that are otherwise described in this Policy, as well as for those activities not described in this policy but which are permitted or required by law.

We may combine personal information: (a) internally with other information collected and/or stored by our affiliates in relation to our different products and services offered by Tricon or one of its affiliates; and (b) with demographic information, publicly available records and other third-party information sources. We may use this information to provide you with a customized experience, to promote and develop products and services available through Tricon or its affiliates, or as otherwise permitted by this Policy.

Should we require your information to fulfill a purpose that is not identified in this Policy or that is otherwise not permitted or required by law, we will obtain your consent before proceeding.

### **3. Limiting the Collection, Use and Disclosure of Your Personal Information**

#### ***a) The information we collect***

The type of personal information we collect is reasonably connected to the purposes for the collection. The type of personal information that we may collect includes but is not necessarily limited to the following: (i) your name; (ii) home address and/or mailing address, email address, business telephone number, cell phone number and emergency telephone numbers; (iii) payment, banking and other financial history and information; (iv) vehicle information, including but not limited to your license plate number; (v) mortgage information; (vi) demographic information; (vii) household information; (viii) past tenancy history; (ix) employment information (past and present); (x) your income; (xi) your date of birth; (xii) references and conduct history; (xiii) intended use of the premises; (xiv) any special needs of tenants, including disabilities and health concerns; (xv) travel document details; (xvi) official government documents; (xvii) social insurance number and social security number; (xviii) information collected through the use of video surveillance systems, which may be installed in the common areas of our buildings or properties; and (xix) other information that you share in your communications with us, our employees, or our contractors, including on or through our mobile applications, as well as our websites [www.triconcapital.com](http://www.triconcapital.com), [www.triconamericanhomes.com](http://www.triconamericanhomes.com), [www.triconhouse.com](http://www.triconhouse.com), [www.renttheselby.com](http://www.renttheselby.com) and/or other websites owned or operated by Tricon (collectively, the “Website”).

The choice to provide us with your personal information, either directly or through a third party, is yours. However, your decision to withhold particular information may limit our ability to provide you with tenancy and/or some of our products or services.

#### ***b) How your information is collected***

Personal information may be collected in a number of ways, including but not limited to: in person, over the phone, by mail, by fax, over the Internet (including from our Website, applications or by email) and from third parties whom you have authorized to disclose personal information to us.

Personal information is collected in a number of circumstances, including but not limited to when you: send an inquiry to us, complete a rental application form, complete a tenancy rental/lease agreement, submit a maintenance request, submit a request for proposal, execute service contracts and execute transaction documents.

Personal information is often collected from property owners, tenants, prospective tenants, prospective investors, shareholders, procurement professionals, employers, financial institutions, credit reporting agencies, existing project management companies where management of existing properties are transferred to Tricon and trades companies.

Personal information may be collected from your financial, investment and/or legal advisors when you are looking at entering into investment and/or other commercial transactions with Tricon.

We may collect usage information from users of our services, including through the use of cookies, web beacons and tracking pixels, SDKs, and other similar technologies. Cookies are very small text files that are stored on your browser or device. Usage information collected from our Website and our applications may include your device type, device identifier, IP address, MAC address, location, browser type, operating system, duration of use, user behaviour, length of time spent on the services, and frequency of use. We may use this information for purposes including remembering your preferences and settings, determining the popularity of certain content, authenticating users, determining the effectiveness of any advertising campaigns, and analyzing the behaviour and interests of people (including traffic and trends) accessing our Website and applications. We may also allow others to provide analytics services (e.g. Google Analytics) and audience measurement services for us, to serve advertisements on our behalf on the Internet, and to monitor and report on the performance of those advertisements. These third parties may perform such services through the use of cookies, web beacons and tracking pixels, SDKs, and other similar technologies. By modifying your browser settings, you may be able to block cookies or otherwise make adjustments to the use of cookies, although this may impair the functioning of certain Tricon services. You may also visit <http://optout.networkadvertising.org/?c=1> to opt out of certain other cookies.

If you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party directly. If the third party does not sufficiently respond to your inquiries, please let us know immediately.

Your personal information will only be used or disclosed in accordance with the purposes for which it was collected, unless you have otherwise consented or except where required or permitted by law.

***c) We may monitor and record telephone calls***

For the purpose of maintaining quality service, telephone calls to our customer service lines may be recorded. If your call is subject to a quality assurance program, you will be so advised prior to speaking with a representative.

***d) Disclosure to third parties***

We will only disclose your personal information to third parties pursuant to the terms of this Policy, if you have otherwise so consented or if required or permitted by law.

We may share personal information with a co-tenant or guarantor of your obligations under the terms of your tenancy agreement, or to any third party payor of your obligations under the terms of your tenancy agreement or related housing agreement.

We may provide personal information to our affiliates, as well as to third parties who may provide service to us or to you (such as the providers of television, telephone, Internet, hydro-electricity, water,

gas and/or other services) for purposes of providing the services you have requested or in which we reasonably believe you may be interested.

As well, Tricon may enter into agreements with various persons (“**Promotional Partners**”) who offer products, services or opportunities that we believe may be of interest and/or benefit to our tenants and residents. For those purposes, and when Tricon reasonably believes it has your consent to do so, Tricon may share with our Promotional Partners your property address and unit number, the name of the person on the lease as well as your contact phone numbers and email addresses.

Because Tricon often owns properties together with other investors, we may share personal information with such investors for audit, management, legal, billing, strategy or administrative purposes including defending and enforcing our legal rights or the legal rights of third parties.

The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances, such as a legal proceeding or court order, we may also be required to disclose your personal information to authorities.

Your personal information may be disclosed in situations where we are legally permitted to do so, such as in the course of employing reasonable and legal methods to enforce our rights or to investigate suspicion of unlawful activities. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property and safety of ourselves and others.

You also understand and agree that we may use your personal information and disclose your personal information to third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of our business or assets (including a lease agreement) for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples, permitting such parties to determine whether to proceed or continue with the transaction, fulfilling any reporting or audit requirements to such parties, and/or disclosing personal information as part of concluding a sale or transfer of assets. In such cases, we will take reasonable measures to protect the personal information we disclose. Our successors and assigns may retain, collect, use and disclose your personal information for substantially the same purposes as those set out in this Policy. In the event the transaction does not go through, we will require, by contract, the other party or parties to the transaction not to use or disclose your personal information in any manner whatsoever for any purpose, and to return or destroy such personal information.

We transfer personal information to service providers (including affiliates acting in this capacity) that perform services on our behalf, such as, but not limited to, data hosting and processing, website development, analytics, billing, leasing or similar services.

When you pay Tricon, we will collect, store and use your banking and credit card information for purposes of processing the financial transactions you have agreed to; however, this information may also be provided to our third-party payment provider for purposes of processing the financial transactions on our behalf.

If you post a review, make a comment, or otherwise submit personal information on a public forum such as social media accounts or public forums, on our Website or other applications, your communications may be viewable by the public.

#### *e) Keeping your information accurate*

We make every reasonable effort to keep your personal information as accurate, complete and up-to-date as necessary. If desired, you may verify the accuracy and completeness of your personal information in our records.

Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file, we will remedy any such errors on a timely basis. In the event that inaccurate information is mistakenly sent to a third party, we will communicate relevant changes to the third party where appropriate.

### **4. Protecting Your Personal Information**

#### *a) Access to your information within Tricon*

Our employees and contractors understand the importance of keeping your information private. All employees and contractors are expected to maintain the confidentiality of personal information at all times and failure to do so will result in appropriate disciplinary measures, including dismissal.

#### *b) Disposal and Retention*

Except as otherwise permitted or required by law, your personal information will be retained for so long as is reasonably necessary to fulfil the purposes for which it was collected.

#### *c) Safeguarding your information*

To ensure that your personal information is protected, we utilize security safeguards that are on par with the industry standard. We use modern technologies to ensure that your confidential information is not compromised. We keep electronic customer files in a secured environment with restricted access and use.

### **5. Investors and Subscriber's Personal Information**

Occasionally, individuals are also investors in Tricon's business, typically through subscribing for units, shares or other securities in Tricon or one of Tricon's projects and/or investment vehicles (for this section, those individuals shall be referred to as "**Subscribers**"). The terms in the rest of this Policy shall govern, in addition to the terms in this section, in relation to each Subscriber. Each Subscriber agrees that their personal information is being collected and may be used by Tricon or transfer agents for the purposes of completing the offering or transactions requested by the Subscriber. This includes, without limitation, determining the Subscriber's eligibility to purchase the units, shares and/or other securities, preparing and registering certificates representing securities or arranging for non-certificated, electronic delivery of same, and completing filings required by any securities regulatory authority or exchange. Such personal information may be disclosed by Tricon to: (a) securities regulatory authorities, stock exchanges, such as the Toronto Stock Exchange; (b) Tricon's registrar and transfer agent; (c) any government agency, board or other entity; (d) as required or permitted by law; and (e) other parties involved in the transactions to whom the personal information must reasonably be disclosed for purposes of assessing or concluding the transactions, including Tricon's legal counsel and its other agents and representatives, and may be included in documentation in connection with the transaction. Information in the custody and control of a public sector entity may be subject to disclosure through freedom of information legislation.

If the Subscriber is resident or otherwise subject to Canadian securities laws: (i) the Company may deliver to the applicable securities regulatory authority or regulator certain personal information pertaining to the Subscriber, including such Subscriber's full name, residential address and telephone number, email address, the number of units, shares and/or other securities purchased by such Subscriber, the aggregate subscription or purchase price, the prospectus exemption under Canadian securities laws relied on, if applicable, and the date of distribution of the share, unit and/or other securities; (ii) such information is being collected indirectly by the applicable securities regulatory authority or regulator under the authority granted to it in securities legislation; (iii) such information is being collected for the purposes of the administration and enforcement of applicable Canadian securities laws of the local Canadian jurisdiction; and (iv) the Subscriber may contact the public officials with respect to questions about the security regulatory authority's or regulator's indirect collection of such information.

## **6. Addressing Your Inquiries and Concerns**

We are happy to provide you with a copy of this Policy and to discuss any of its content with you. Upon request, we will also let you know what information we have collected on you, how it is used and any third parties to whom your personal information has been disclosed. See Section 11 below for additional rights you may have.

Please direct all questions or enquiries about this Policy to:

Tricon Capital Group Inc.  
Attention: Privacy Officer  
7 St. Thomas Street, Suite 801  
Toronto, ON M5S 2B7  
Email Address: [privacy@triconcapital.com](mailto:privacy@triconcapital.com)

## **7. Updating this Privacy Policy**

Any changes to our privacy standards and information handling practices will be reflected in this Policy in a timely manner. Tricon reserves the right to change, modify, add, or remove portions of this Policy at any time. Please check this page periodically for any modifications. To determine when this Policy was last updated, please refer to the modification date at the bottom of this Policy.

Tricon strives to evolve to meet our customer's needs and expectations and that means our products and services may change and how we offer our products and services may change. With that in mind, we review our privacy practices from time to time, and our information handling practices may change. If Tricon makes a material change to this Policy, we will post a notice on our Website and highlight the changes. We may also notify you by email or other electronic means.

If at any point you do not agree with the terms of this Policy, you must not use Tricon's services or provide personal information to Tricon.

## **8. Website and Apps Governed by this Privacy Policy**

Our Website and any of our applications available from our Website or third-party platforms are governed by the provisions and practices stated in this Policy. Our Website and such applications may contain links to third-party sites or applications that are not governed by this Policy. Although we endeavour to only link to sites or applications that share our commitment to your privacy, please be

aware that this Policy will no longer apply once you leave our Website or such applications, and that we are not responsible for the privacy practices of third-party sites or applications. We therefore suggest that you closely examine the respective privacy policies of third-party sites and applications to learn how they collect, use and disclose your personal information.

## **9. Children**

Our Website is not directed to children under the age of 13, and we do not solicit or knowingly collect any personal information from children under the age of 13.

## **10. Governing Law and Personal Information in Other Jurisdictions**

This Policy and all related matters shall be interpreted and construed in accordance with the laws of the Province of Ontario and the applicable federal laws of Canada.

Tricon may perform activities outside of Ontario and outside of Canada through third parties. Personal information provided to our service providers, payment processors, affiliates and subsidiaries may be stored outside of Ontario and outside of Canada. The use made by such third parties shall be in accordance with the terms of this Policy. You acknowledge and agree that, as a result, your personal information may be processed, used, stored or accessed in other jurisdictions and may be subject to the laws of those jurisdictions. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement in other countries.

## **11. California Consumer Privacy Rights**

If you are a resident of the State of California, USA, you have certain privacy rights under the California Consumer Privacy Act (“CCPA Rights”). This section describes those rights and how you can exercise them with Tricon.

### **CCPA Rights Requests**

#### *Right to Know and Right to Deletion*

You can request what personal information we have collected, used, disclosed, and sold in the preceding 12 months.

You can also request that we delete your personal information. We may not delete all of your personal information if one of the following exceptions applies:

- **Transactional:** to complete a transaction for which the personal information was collected, provide a good or service requested by you, or perform a contract we have with you;
- **Security:** to detect data security incidents;
- **Error Correction:** to debug or repair any errors;
- **Legal:** to protect against fraud or illegal activity or to comply with applicable law or a legal obligation, or exercise rights under the law, such as the right to free speech; or



- **Internal Use:** to use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information (i.e. to improve our services).

To submit a request to know or a request to delete, please contact [privacy@triconcapital.com](mailto:privacy@triconcapital.com). In order to verify your identity, we will send you a verification email. In order to designate an authorized agent to act on your behalf you must provide the authorized agent with written permission to do so, and your authorized agent must submit that written proof by mail or e-mail to the address specified in Section 6 of this Policy so that it is received prior to the time the agent makes the request on your behalf. A request to know or a request to delete may alternatively be initiated by calling us at the telephone number specified in Section 6 of this Policy. If you wish to make multiple requests under this section, we recommend sending the deletion request last, as we will not be able to fulfill your other requests once we have deleted your information.

### **We Do Not Sell Your Personal Information**

We do not and will not sell any personal information (as “sell” is defined in CCPA).

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA Rights and we will not deny you goods or services, charge you a different price, or provide you with a lesser quality of goods or services if you exercise any of your CCPA Rights.

Last revised Thursday, January 16, 2020