

SHAPE Privacy Notice

Last updated October 8, 2020

Shape Holdings Corp. and its affiliated and associated advisory and service companies (collectively referred to as “**SHAPE**”) are committed to providing exceptional services to SHAPE’s clients, customers, stakeholders and partners. SHAPE’s services, which include real estate development, planning, financing, sales, marketing, asset and property management and any other services, applications or other products offered from time to time (collectively, our “**Services**” and each, a “**Service**”), involve the collection, use and disclosure of Personal Information (as defined below). SHAPE is dedicated to treating your Personal Information with care and respect.

SHAPE is subject to British Columbia’s Personal Information Protection Act (“**PIPA**”) and Canada’s Personal Information Protection and Electronic Documents Act (“**PIPEDA**”) where Personal Information crosses provincial boundaries and international borders. SHAPE is subject to other laws besides privacy laws and is obligated to protect your financial information as well.

When you use our Services, you are agreeing to the terms of our Privacy Notice. If you do not want SHAPE to use or disclose your Personal Information in the ways identified in our Privacy Notice, please do not use our Services.

If you would like more information about this Privacy Notice or our practices related to Personal Information, please contact our Privacy Officer at privacy@shapeproperties.com.

Personal Information

Personal Information is any information that can be used to uniquely identify a specific individual.

We will inform you of why and how we collect, use and disclose Personal Information, obtain consent where required and only handle Personal Information in a manner that a reasonable person would consider appropriate in the circumstances.

Personal Information does not include Contact Information, which is information that would enable an individual to be contacted at a place of business and includes name, position or title, business telephone number, business address, business email or business fax number. PIPA and PIPEDA do not cover Contact Information. This Privacy Notice does not cover Contact Information.

Personal Information is information that can be used to identify an individual.

Personal Information does not include business Contact Information.

Collecting Personal Information and Purposes

The Personal Information that SHAPE collects will be different depending on the Services being provided. We will only collect Personal Information that is necessary for the purpose of providing a particular Service, with your consent where required.

Here are some examples of specific purposes:

- To respond to requests for information about SHAPE and our Services, you may choose to provide us with your name, address, email address and phone number. SHAPE may also use this information with your consent to identify you as someone interested in future projects and to contact you about those projects.
- To complete a purchase transaction, we will collect your full name, address, phone number, email address, SIN and a copy of your government-issued identification confirming your residency status.
- To comply with regulatory requirements, for example to verify personal identification according to regulatory requirements (FINTRAC) or to register property sale assignments with the Land Title and Survey Authority of British Columbia, we will collect your name, home address, date of birth, employment information, residency information and photo ID.
- To complete background and credit checks, we will collect your employment information, lease/rental history, educational background and other financial and legal information.
- To assess creditworthiness as a commercial tenant or guarantor of a commercial lease, we will collect your full name, name of spouse, residential address, home ownership information, date of birth, phone number and financial information.
- To assess suitability as a prospective residential tenant, we will collect your full name, address, phone number, email address, date of birth, SIN, citizenship information, rental history, employment information, photo ID, emergency contact information and financial

SHAPE will collect different Personal Information from you depending on the Services you are using. The information we collect will be necessary and reasonable for the purpose, which may be:

- to respond to your request;
- to identify you and contact you about SHAPE projects;
- to complete your purchase transaction;
- to comply with our regulatory requirements;
- to complete a background or credit check;
- to assess your creditworthiness;
- to assess your suitability as a tenant; or
- to complete your rental transaction.

Consent

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.

In certain circumstances Personal Information can be collected, used or disclosed without the knowledge and consent of the individual. For example, legal, medical or security reasons may make it impossible or impractical to seek consent. Seeking consent may be impossible or inappropriate when the individual is a minor, seriously ill, or mentally incapacitated. In addition, organizations that do not have a direct relationship with an individual may not always be able to seek consent from that individual. We may also collect, use or disclose Personal Information without knowledge or consent:

- when the Personal Information is available from a public source;
- when we require advice from a lawyer;
- for the purposes of collecting a debt; and
- to protect ourselves from fraud.

SHAPE will obtain your consent to collect, use or disclose your Personal Information in most circumstances.

Using and Sharing Personal Information

SHAPE will only use or share Personal Information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those initially identified purposes. We will also use Personal Information to:

- conduct surveys and gather feedback so that we can improve our Services;
- assist you with technical support issues related to the Services; and
- comply with any laws, regulations, court orders, subpoenas or other legal processes or investigations and to protect us and other individuals as permitted by law.

Where your Personal Information may be disclosed to SHAPE partners and co-owners in the course of a lease or purchase transaction, you will be informed of the possibility at the time the information is collected.

We will not use or disclose Personal Information for any additional purpose unless we obtain consent to do so.

We will not sell or rent your Personal Information to third parties unless we have your consent to do so.

Privacy law does not cover information that does not uniquely identify an individual. SHAPE may generate and use anonymous information, data that does not identify a specific individual, for our own business purposes.

SHAPE only uses and shares the Personal Information you provide to fulfill the purposes identified when it was collected or for a reasonably related purpose.

If we are going to share your Personal Information related to a lease or purchase transaction with our partners and co-owners, we will let you know.

We do not sell or rent your Personal Information to third parties unless we have your consent to do so.

Privacy law does not cover information that does not identify an individual. SHAPE is free to use this type of information for our own business purposes.

Keeping Personal Information

If we use Personal Information to make a decision that directly affects you, we will keep that Personal Information for at least one year so that you have a reasonable opportunity to request access to it.

Subject to the above, we will keep your Personal Information only as long as necessary to fulfill the identified purposes or a related business or legal purpose.

You can unsubscribe from our marketing emails at any time by clicking on the “unsubscribe” link in the message.

SHAPE will keep your Personal Information for at least one year if we use it to make a decision about you. Other than that, we keep it only for as long as necessary to fulfill the identified or related purpose.

You can unsubscribe from our email list easily at any time by clicking on the “unsubscribe” link.

Ensuring Accuracy

We rely on you to ensure that the Personal Information you provide is accurate, complete and up-to-date. Where your Personal Information will be used to make a decision about you or is disclosed for the purpose of delivering the Services, we will make reasonable efforts to ensure that your Personal Information is accurate and complete.

You are welcome to make changes and request deletions or corrections to your Personal Information at any time by contacting us at privacy@shapeproperties.com or logging on to your account, if applicable in the circumstances.

SHAPE relies on you to provide accurate Personal Information, but if we need to use it to make a decision about you or have to disclose it in order to deliver our Services, we will do our best to make sure it is accurate and complete.

You can contact us at privacy@shapeproperties.com to update your Personal Information or log on to your account to do it, if applicable.

Securing Personal Information

We use industry standard security practices and take reasonable steps to protect your Personal Information from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. We train our teams to follow our privacy and security practices, including the principles of privacy by design.

Using contracts, we ensure that any third party acting on our behalf in respect of receiving, handling or storing your Personal Information maintains reasonable and appropriate safeguards. Third parties acting on our behalf are not permitted to use or disclose your Personal Information for any purpose other than providing the Services.

We will use appropriate security measures when destroying Personal Information such as deleting electronically stored information.

We will continually review and update our security policies and controls as technology changes to ensure ongoing Personal Information security. However, please bear in mind that no Internet or email transmission is ever fully secure or error free and no security system is impenetrable. We cannot guarantee the confidentiality of any information that you share with us.

SHAPE protects your Personal Information using standard and reasonable security practices.

SHAPE makes sure that the organizations that help us deliver our Services protect your Personal Information too.

We do our best to protect your Personal Information but we cannot guarantee its security.

<p>Location of Services</p> <p>While SHAPE is located in Canada, we may transfer Personal Information to other countries for processing, including using third party service providers located in countries other than Canada. You understand that your Personal Information may be transferred to a country that may have different privacy protections than Canada. For more information on where data is stored, please contact our Privacy Officer at privacy@shapeproperties.com.</p>	<p>SHAPE is located in Canada but the organizations that help us deliver our Services may be in other countries. Laws in these other countries may not protect your Personal Information the same way our Canadian laws do.</p>
<p>Individual Access</p> <p>You own the Personal Information you submit to SHAPE and can review, edit or remove it at any time subject to limited exceptions. Upon written request, SHAPE will also let you know which third party service providers we have disclosed your Personal Information to, if applicable.</p>	<p>You can contact us in writing to request access to the Personal Information about you that SHAPE holds or ask with whom we have shared it.</p>
<p>Cookies and Other Tracking Technologies</p> <p>We use cookies and other analytics programs on our websites to improve your experience and our Services, to save you time, and to make it possible to navigate our website. We do not link the information we store in cookies or generate through analytics programs to any Personal Information you submit while using our Services or visiting our websites. You can remove cookies manually by following directions provided in your Internet browser's "help" file. If you refuse cookies, you will not be able to use some or all of our online Services.</p>	<p>SHAPE uses cookies and analytics programs on our websites. You can remove cookies, but this might limit what you can do on our sites.</p>

<p>Additional Features and Information</p> <p>Please do not include any sensitive Personal Information in any emails you send to us. Email is not a secure method of communication. We cannot guarantee the security of email messages you send to us.</p> <p>It is important to guard your privacy when you are online. If our websites or other electronic communications contain links to other websites, this Privacy Notice does not govern those websites. Regardless of the source of those links, you should read the associated privacy notices and make an informed decision about whether you want to use those websites or the services advertised on the websites.</p>	<p>It is best not to send any sensitive Personal Information by email, as emailing is not secure way to communicate.</p> <p>If you are on a SHAPE website and click on a link to go to another site, we are not responsible for that site owner’s privacy practices. Make sure you read the privacy notices of any other sites you visit.</p>
<p>Employee Information</p> <p>When you apply for a job with SHAPE, we will collect Personal Information related to your application. In the event you are hired, we will collect information required to manage the employment relationship. Please contact our Privacy Officer for details regarding the management of Personal Information collected during the hiring process and employee Personal Information.</p>	<p>SHAPE protects the Personal Information of job applicants and employees too.</p>
<p>Changing this Privacy Notice</p> <p>SHAPE may amend this Privacy Notice from time to time. We will post the date of the most recent changes and provide previous versions upon request. If we make significant changes, we will provide a more prominent notice (including email notification if appropriate).</p> <p>We encourage you to periodically review our Privacy Notice for the latest information on our privacy practices and to contact us if you have any questions or concerns.</p>	<p>If SHAPE updates this Privacy Notice, we will let you know.</p> <p>You should review our Privacy Notice periodically and contact us if you have any questions.</p>

Questions and Complaints

Our Privacy Officer is responsible for ensuring SHAPE's compliance with this Privacy Notice and all applicable privacy laws. You may send your privacy-related questions, concerns or complaints to our Privacy Officer:

Greg Lee, General Counsel
2020 One Bentall Centre
505 Burrard Street
Vancouver, BC, Canada
V7X 1M6
Email: privacy@shapeproperties.com

SHAPE will respond to enquiries within 30 calendar days of receipt.

If our Privacy Officer is unable to resolve your concern, you may also contact the Information and Privacy Commissioner of British Columbia.

Our Privacy Officer makes sure we comply with privacy laws and will respond to any of your questions, concerns or complaints.

If our Privacy Officer cannot resolve an issue, you can contact the Privacy Commissioner.