

## TKACHUK REALTY GROUP LTD. PRIVACY STATEMENT

*Last Updated: 27Jan2019*

- **About this Privacy Statement:**

Tkachuk Realty Group Ltd. (“TRG”, “we”, “our”, “us”) values your privacy. As such, it is the policy of Tkachuk Realty Group Ltd. that personal information that you provide, such as your name, gender, postal and e-mail address or telephone number is private and confidential.

This Privacy Statement describes our personal information handling practices, including a description of the personal information that we collect, use and disclose, for what purposes, and how to obtain further information about these practices.

The website [www.tkachukrealtygroup.com](http://www.tkachukrealtygroup.com) ("the Site") is operated by TRG (the "Operator") contains the Privacy Policy for the Site along with other websites, microsites, mobile applications, blogs, and social media sites and pages and any other online services offered by TRG including but not limited to the Operator's Brokerage, Consulting, and Management Services (collectively, the "Service")

By accessing or using the Site, you consent to the collection, use and disclosure of personal information by the TRG in accordance with this Privacy Policy. You may choose not to provide us with personal information. However, if you make this choice we may not be able to provide you with the application, service or information that you requested.

- **Definitions:**

For the purposes of this Privacy Policy the following definitions apply:

“collection” means the act of gathering, acquiring, storing, retrieving, recording or obtaining personal information from any source, including third parties, by any means. “consent” means voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative, such as a parent or guardian. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from a user's action or inaction. “disclosure” means making personal information available to a third party. “employee” means an employee of Tkachuk Realty Group Ltd. and for the purpose of this Privacy Policy only, includes agents, independent and other contractors performing services for the Operator. “personal information” means information about an identifiable individual, but not aggregated information that cannot be associated with a specific individual. “process” means any operation performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. “Subscribing Individual/Entity” means an individual, company, entity or organization that has “third party” means an individual other than the user, or the user's agent, or an organization outside of the Operator or an Individual/Entity. “use” means the treatment, handling and management of personal information by and within the Operator. “user” means an individual who uses the Service provided by the Operator, including anyone else who accesses or visits the Sites.

- **Purpose and Use:**

We collect your personal information and will use your personal information as is reasonably required for the following purposes:

- to send you communications you have opted-in/subscribed to receive;
- to provide web applications, the Site, the Services, and/or the other services or information that you request;
- to improve users' experience of the Site and mobile applications;
- to respond to questions, comments, requests, job applications, or complaints that you submit to the Operator;
- to process payments made by you to the Operator;
- to track communications with you;
- to analyze use of the Site and the Service and to improve the Site and the Service;
- to provide Service and Site-related announcements or notifications to you;
- For security purposes, such as the prevention of potentially prohibited or illegal activities and to detect errors;
- to fulfill a purpose that we disclose to you when we request your personal information;
- to enforce the website terms of use.
- to meet legal and regulatory requirements if we believe that doing so is necessary:
  - to comply with applicable law, a court order, warrant, request from government or law enforcement, or other legal process;
  - to investigate, prevent, or act involving illegal activities, suspected fraud, violations of professional standards, or threats to property or physical safety of any person; or
  - to establish, protect, or exercise our legal rights or defend against legal claims.

The Operator's staff are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Personal information will only be collected and used by authorized staff in a manner consistent with the activities of TRG.

- **Collection:**

TRG may collect and use information about you if the information is reasonably required to provide the services accessed or requested by you including: name; employment details business entity history; mailing address; phone number; and input and feedback on matters relevant to products, services and subscriptions. This information may be collected directly or indirectly from you through the following:

- The Operator's Site: [www.tkachukrealtygroup.com](http://www.tkachukrealtygroup.com) and its microsites and blogs collect information you provide when you access the Site such as your geographical location, browser type and version, operating system, length of visit, page views and website navigation path (how you got to our site).
- IP Addresses: Similar to other commercial websites, our website collects information about how our website is used. Each time a visitor comes to the website our web server collects the visitor's internet protocol or IP address. Our web server needs to collect and use your internet protocol ("IP") address to facilitate communication between our server and your browser, and to protect our website against security threats.
- Cookies: Our website uses standard technology known as "cookies" which are small text files either persistent cookies (Persistent cookies are created for specific functions you may choose to use on the website including, but not limited to: accepting terms of use; saving searches; and saving favourites. Persistent cookies are used to improve your experience of the website and are retained from session to session. These cookies remain after the browser is closed and are stored locally on your system) and Session cookies temporarily keep your settings. This information is stored until your browser is closed. You may choose to delete persistent cookies after visiting the website by changing the settings in your web browser.
- Google Analytics: Our website uses Google Analytics, web and mobile analytics tracking tool provided by Google, for audience activity, demographics reporting, and remarketing. We also use Google Analytics to obtain information about site users and how our site is used. Google Analytics collects non-identifying information, including such things as IP address, browser and device configuration, how you came to the site (e.g., by directly typing our web address vs. referral from a

search engine), how much time you spend on the site, and on which pages. The insights we learn help us make our website better by improving and optimizing the content we provide and how it is delivered. You can opt-out of Google Analytics by installing a browser plug-in available on Google's website.

- Correspondence: Your correspondence with TRG's employees or agents, including but not limited to correspondence with agents in relation to property listings, consulting and management activities and including any questions, concerns or comments you may have about the Service, the Sites or problems that you report; and details of your requests made through the Sites. This includes e-mails, file attachments, recorded web-conferences, text messages, voice mail or other electronic or written communications provided by you.
- Online Payments: TRG does not collect information related to method of payment such as a credit or debit card number. All purchases of the Operator's products and services will be directed to and handled by third parties such as PayPal or Stripe and you will be bound by the privacy policies of these third-party sites.
- Third Party Links And Sources Of Information: This website consists of, and includes links to, many websites, including: TRG social media pages, blogs, and microsites, (such as GoDaddy, Google, LinkedIn, Facebook, Instagram and Twitter), mapping sites, Subscription, Sign-Up, Contact Request Digital Forms (Microsoft, GoDaddy, Constant Contact, Mailchimp, Hootsuite and Salesforce platforms) and Strategic Alliance Entities (such as WinnipegREALTORS®, CPIX, Catalyst, WinnipegREALTORS® Commercial Realtors, Real Estate Institute of Manitoba[REIM], Real Estate Institute of Canada[REIC], Institute of Real Estate Management[IREM]).

This privacy policy applies only to those sites which display this statement. While TRG encourages the site operators to comply with these principles, you should carefully examine the privacy policies of sites appearing on, or linking to or from this website, which do not display this privacy policy. Personal information that you choose to provide to other websites will be subject to the privacy policies of those sites.

- **Safeguards and Storage:**

TRG is committed to safeguarding and secure storage of your personal information. We use appropriate security measures to protect personal information against risks such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction regardless of the format in which it is held.

Personal information is stored using secure, access-restricted systems, which may reside on MREA servers, or on the servers of our service providers, which include the following:

- Email and Digital Information Storage is contained with the Microsoft Azure Cloud Infrastructures, Salesforce, and GoDaddy Technologies. Personal information processed by service providers may be transferred to and stored in other countries, such as the United States, and could therefore be accessed by courts, governments, and law enforcement agencies in those countries where required by law.
- Other physical methods of protection and safeguards used by the Operator include, but are not limited to, locked filing cabinets, need-to-know access and technological measures, including the use of passwords, encryption and firewalls.
- The Operator also ensures that its employees with access to personal information are made aware of the importance of maintaining the confidentiality of personal information.
- The Operator protects personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

- While we cannot guarantee that risks such as loss, theft, unauthorized access or disclosure of personal information will not occur, TRG makes every reasonable effort to prevent such unfortunate and unforeseen occurrences.

- **Processing, Retention and Deletion**

We may process your personal information relative to the use of our Site and Services. TRG does not collect IP addresses and any IP addresses are loaded anonymously to the Site. Personal information may be processed for the purposes of analyzing users' use of the Site. The legal basis for this processing is the Operator's legitimate interests, including monitoring and improving its Sites and Services. The Operator will not retain personal information longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

TRG at all times adheres to applicable legal or regulatory requirement(s) concerning the storage and protection of personal information. While TRG is the custodian of the personal information provided to it, it does use third party service providers. Some of these service providers and the databases where they store personal information are located outside of Canada. You should note that where personal information is located outside of Canada, it is subject to the laws of that jurisdiction in which it is located.

The Operator takes care in disposing of or destroying personal information to prevent unauthorized parties from gaining access to the information.

- **Disclosure of Personal Information**

TRG may disclose your personal information to:

- each of its employees, agents, partners and service providers as is reasonably necessary to enable these parties to perform a business, professional or technical support function for the Operator;
- a person who, in the reasonable judgment of TRG, is seeking the information as your agent; and;
- a third party or parties, where you consent to such disclosure or the disclosure is required by law.

We may also disclose your personal information in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to such transaction, provided that the information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information.

- **Accuracy**

TRG is committed to keeping your personal information as complete, up-to-date and accurate as is necessary for the purposes for which it is to be used. The Operator will promptly correct or complete any personal information found to be inaccurate or incomplete. Where appropriate, the Operator will transmit amended information to third parties having access to the personal information in question. Upon request, the Operator will provide you with a reasonable opportunity to review the personal information in your file to review its accuracy. Such personal information will be provided within a reasonable time of the request and at a minimal or no cost to you.

Also, upon request, the Operator will provide an account of the use and disclosure of your personal information within 30 business days after the date of the request and, where reasonably possible, will state the source of the information. In providing an account of disclosure, we will provide a list of organizations to which it may have disclosed personal information about you when it is not possible to provide an actual list. Upon request, we will provide personal information in a commonly used digital format within 30 business days after the date of the request.

- **Public Information**

Public ("non-personal information") is information that does not identify you and which we are unable to connect to other information in order to identify you. TRG may collect any or all of the following non-personal information:

- Aggregated data resulting from the combination and/or aggregation of certain raw data collected from you or your business (including, but not limited to, financial information and operational data) with other data in a way that no longer personally identifies the user.
- We may also use additional analytics programs from time to time to process nonpersonal information about you. We make no attempt to link this non-personal information with the identity of individuals using the Sites. Non-personal information may be permanently archived for future use in any manner whatsoever by the Operator.

- **Requesting Access**

You may request access to personal information that TRG has about you. Such requests must be made in writing to our privacy officer using the contact information provided below. We require certain identification information be provided so that we can verify your identity. If you believe that the information, we have in our records is incorrect, you can request that a correction be made.

TRG may refuse access and/or corrections to personal information where required or permitted by law.

- **Withdrawing Consent**

You may withdraw your consent to the collection, use or disclosure of your personal information by the TRG at any time, subject to legal or contractual restrictions and reasonable notice. In certain circumstances, your withdrawal of consent will result in the inability of the Operator to continue providing aspects of the Site and the Service to you. Please contact TRG for more information regarding the implications of withdrawing consent.

- **Unsubscribe**

If you are a Subscribing Individual or Entity to our products or services and no longer wish to receive commercial electronic messages from TRG regarding our new products or services, promotions or other similar communications, you may unsubscribe here. Please note that, after you unsubscribe, the operator may still send electronic communications to you in certain limited circumstances, such as to provide you with Site and Service notifications and billing information, or to provide information that the Operator is legally obligated to provide you. Personal information provided to subscribe to our commercial electronic messages is stored on GoDaddy Canada. You will be bound by the privacy policies of these third-party sites.

- **Breach**

In the event of a breach of personal information, the Operator will promptly inform all users affected by the breach within 72 hours of the Operator discovering the breach. If the breach will affect your rights and freedoms, we will inform you about the breach without undue delay.

- **Complaints**

TRG will promptly investigate all complaints concerning our compliance with the Privacy Policy and our dealings with your personal information. If a complaint is found to be justified, the Operator will take appropriate measures to resolve the complaint, including, if necessary, amending our policies and procedures. You will be informed of the outcome of the investigation regarding your complaint.

- **Changes to Privacy Policy**

To accommodate changes in our services, changes in technology and legal requirements, this Privacy Policy may change over time without notice to you. We may add, change or remove portions of the Privacy Policy when we deem it is appropriate to do so. We encourage you to review our Privacy Policy periodically. Each time you submit personal information or use the Service you agree to be bound by terms of the Privacy Policy which is then current. Whenever we update the Privacy Policy, we will change the date at the top of this policy indicating when the latest version.

- **Inquiries**

To submit an inquiry, request a review of your personal information, correct or update your personal information, submit complaint, withdraw your consent or request more information or a copy of the Privacy Policy contact:

Tkachuk Realty Group Ltd.  
Care of: Privacy Compliance Officer  
Mailing Address: Unit 110-340 Waterfront Drive, Winnipeg, MB R3B 0M3  
Phone Number: 1-431-997-7476  
Email Address: info@tkachukrealtygroup.com.