



## PRIVACY POLICY

Personal Information Protection And Electronic Data Act (PIPEDA)

**FOR:**

CLV Residential and Commercial Property Management  
CLV Realty Corporation  
CLV Financial Services  
Velocity Media

**485 Bank Street, Suite 200, Ottawa, Ontario K2P 1Z2  
613.728.2000 [www.clvgroup.com](http://www.clvgroup.com)**

## **CLV GROUP Inc.**

### **Privacy Policy.**

Privacy of personal information is an important principle to CLV Group Inc. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the premises, goods and services we provide. We also try to be open and transparent as to how we handle personal information. This document describes our privacy policies.

#### **What is Personal Information?**

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, family status), their health (e.g., disabilities) or their activities and views (e.g., religion, politics, opinions expressed by an individual, opinions about an individual). Personal information is to be contrasted with business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

#### **Who We Are**

Our organization, CLV Group Inc., provides property management services to landlords of residential and commercial units. We use a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These include building superintendents, security, cleaning and maintenance organizations, bookkeepers and accountants, computer consultants, temporary workers to cover holidays, cleaners, and lawyers. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

#### **We Collect Personal Information: Primary Purposes**

##### ***About Tenants***

Like all property managers, we collect, use and disclose personal information in order to serve our clients and their tenants and to manage our client's property. For our client's tenants, the primary purpose for collecting personal information is to ensure their safety, security and reasonable enjoyment and that of the other tenants, to ensure they have access to the premises, equipment and services that our clients have agreed to provide, to preserve our client's property and to collect rents and other fees. Examples of the type of information we collect for these purposes includes the following:

- Names of all occupants of the unit.

- Business and emergency contact information
- Use and intended uses of the property
- Compliance with the tenancy agreement and our client's rules and regulations
- Payment, banking and other financial information
- Any special needs of tenants (e.g., disability or health) and
- Social insurance number, but only for the purpose of issuing a tax receipt for interest on the rental deposit

As a service and convenience for tenants we, or our clients, may maintain public directories of tenants (e.g., by the front door). If you do not wish to be listed in any directories or wish to be described in a particular way, please let us know.

It would be rare for us to collect any personal information without the tenant's express consent, but this might occur in a case of urgency (e.g., the tenant is unavailable), where we believe the tenant would consent if asked and it is impractical to obtain consent (e.g., information provided by a relative about an absent tenant), appropriate public sources (e.g., government, court or tribunal records) or to investigate a breach of the tenancy agreement or contravention of the law.

We, or our client, subscribe to a consumer reporting service. This service provides information to landlords about prospective tenants. In return, we on behalf of our client provide information to the service in order for the service to maintain a databank on a tenant's history. We collect your full legal name and date of birth to ensure the accuracy of those records. Having a good tenant history filed with the service will make it easier for you to be accepted as a tenant at other properties in the future. We, or our client, obtain your consent for using the consumer reporting service in the rental application form and tenancy agreement.

The information described above and the information set out below about prospective tenants can be collected or updated if the tenant is in arrears of rent or fees or wishes to renew a tenancy agreement.

### ***About Prospective Tenants***

Prospective tenants are requested to complete a rental application form so that we, or our client, can assess their suitability as tenants and have necessary basic information should they become tenants. This would include the following types of information:

- Past tenancy history
- Employment history
- References and conduct history
- Financial means and credit history
- Automobile information and

- Intended use of the premises

We, or our client, will then confirm this information and check references and the conduct history of the prospective tenants. This might include following up with other individuals identified during the course of these inquiries as having relevant information (e.g., a person identified by a reference you provided to us). We, or our client, may also contact a credit agency and/or a consumer reporting service for information about your suitability. We, or our client, might also check appropriate public sources (e.g., government, court or tribunal records). By completing a rental application form you agree to us, or our client, collecting this information about your suitability to be a tenant.

### ***About Members of the General Public***

For members of the general public, our primary purpose for collecting personal information is to promote the safety of tenants and the security of the property. For example we, or our client, may operate security cameras and monitor the presence, vehicles and the conduct of visitors and non-tenants on our property. We believe that the collection of this information is implied by the private and residential nature of our client's property.

Secondly, we, or our client, might gather personal information in the course of marketing our client's property to prospective tenants. This information is collected either from appropriate public sources (e.g., telephone directories) or directly from the individuals with their consent.

On our website, we only collect, with the exception of cookies (electronic markers identifying computers that have previously visited our website), the personal information you provide and only use that information for the purpose you gave it to us (e.g., to respond to your email message, to provide information about our services). Cookies are only used to help you navigate our website and are not used to monitor you.

### ***Suppliers and Contractors***

We often deal with suppliers and contractors who provide goods and services to the properties we manage. We monitor their performance, including their promptness, reliability, quality and value of services. Most of this information is business information and would not be covered by privacy legislation. However, occasionally, this information relates to the conduct of an individual (e.g., skill of a particular employee of a supplier or contractor, inappropriate behaviour or comments by a particular representative). We reserve the right to collect this information, use it in deciding upon future services and to disclose it to the landlord or others involved in related or similar operations. We may also collect home contact information to reach them in case of emergencies.

### ***Sharing Information with Our Clients***

We usually act as agents for our landlord clients. Thus, we will share (or transfer) any personal information we collect relevant to a particular client with that client. We advise our clients to have their own privacy policy consistent with both our privacy policy and with the *Personal Information Protection and Electronic Documents Act*.

### ***About Clients***

We collect contact information about our landlord clients for better communication or to reach them in case of emergencies. We also collect information about our client's instruction, wishes and preferences in order to better serve them. Generally we collect information about our clients directly from them and with their consent.

### ***About Contract Staff***

For people who are contracted to do work for us (e.g., temporary workers), our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g., for new assignments) and for necessary work-related communication (e.g., sending out paycheques, year-end tax receipts, tax filings). Examples of the type of personal information we collect for those purposes include home addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of an emergency (e.g., an outbreak of a contagious disease) or to investigate a possible breach of law (e.g., if a theft were to occur).

### **We Collect Personal Information: Related and Secondary Purposes**

Like most property managers, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- To collect rents and other fees on behalf of our clients.
- To collect fees and accounts from our clients.
- To advise clients and others of new developments in the area of landlord and tenant relations (e.g., a newsletter sent to a home address of a client).
- To advise clients and others of our newsletters, courses we provide, special offers and promotions that we have available.
- We review tenant, client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our consultants, suppliers and staff. In addition, external consultants (e.g., auditors, lawyers, business consultants) may on our behalf do audits and continuing quality improvement reviews of our operations, including reviewing tenant or client files and interviewing our staff.

- Various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. Also, we believe that we should report information suggesting serious illegal behaviour to the authorities. These reports could include personal information about a tenant or other individual to support the concern (e.g., illegal drug activity), although we try to keep this disclosure to a minimum. In these circumstances, we may consult with professionals (e.g., lawyers, a private security service) who will investigate the matter and report back to us.
- If a tenant's rent or fees are paid for by a third party (e.g., employer, your trustee, the government) we may be asked to provide them with certain information. These third party payers often have tenant consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate tenant entitlement to and responsible use of this funding.
- Tenants, clients or other individuals we deal with may have questions about the services they received. We also provide ongoing services for many tenants and clients over a period of months or years for which previous records are helpful. We retain tenant and client information for a minimum of ten years after the last contact to enable us to respond to those questions and provide these services.
- If CLV Group Inc. or its assets were to be sold, the purchaser would want to conduct a "due diligence" review of the organization's records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization's business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

You can choose not to be part of some of these related or secondary purposes (e.g., declining to receive our newsletter, by not having a third party pay your rent). We do not, however, have much choice about some of these related or secondary purposes (e.g., external regulation).

### **Protecting Personal Information**

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- Paper information is either under supervision or secured in a locked or restricted area.

- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All of our cell phones are digital, which signals are more difficult to intercept (however, we still are careful on cell phones because sometimes they switch over to an analog service).
- Paper information is only transmitted through sealed, addressed, envelopes or boxes, by reputable companies.
- Electronic information is transmitted either through a direct line or is anonymized or encrypted.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- External consultants and agencies with access to personal information must provide us with appropriate privacy assurances.

### **Retention and Destruction of Personal Information**

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We keep our client files for about ten years. Our client, tenant and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask we will remove such contact information right away. We keep any personal information relating to our general correspondence with people who are not tenants for about two years.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed or completely reformatted.

### **You Can Look at Your Information**

With some exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests.

If there is a problem, we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If we collected personal information on behalf of a landlord client we may have conveyed that information directly to the landlord. If so, we may not have it as a

part of our own files and you will have to go to the landlord to look at the information.

If you believe there is a mistake in the information, you have the right to ask for it to be corrected. We may ask you to provide documentation that our files are wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

### **Do You Have a Question?**

Our Information Officer, Robert Jarrett, can be reached at:

CLV Group Inc.,

485 Bank Street, Suite 200, Ottawa, Ontario K2P 1Z2

613-722-6004 ext 249

He will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. He will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

This policy is made under the *Personal Information Protection and Electronic Documents Act*. It is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

112 Kent Street  
Ottawa, ON K1A 1H3

Phone: (613) 995-8210  
Toll-free: 1-800-282-1376  
Fax: (613) 947-6850  
TTY: (613) 992-9190  
[www.privcom.gc.ca](http://www.privcom.gc.ca)

I have read and understood this privacy policy:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Print Name: \_\_\_\_\_

Witness: \_\_\_\_\_