



Statement of Privacy Principles and Practices

At Alberta Lands Inc. and North American Leaseholds, we respect your privacy

Protecting your personal information and respecting your privacy is important to Alberta Lands Inc. As a provider of rental accommodations, the collection and use of personal information is fundamental to our business. Equally important is your trust in our handling of your personal information. We manage your personal information in accordance with *Alberta's Personal Information Protection Act* and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to Alberta Lands Inc. and North American Leaseholds. The policy also applies to any person providing services on our behalf.

Collection of Your Personal Information

From the moment that you apply for rental accommodations with us, we may collect personal information about you. This personal information is information that specifically refers to you as an individual. Examples of this are your name, home address and phone number, age, sex, marital or family status, employment history, and financial information.

We only collect personal information that we need for the purposes of providing services to our tenants. When practical, we will collect the required information directly from you in completed applications and forms, and through other forms of correspondence such as the telephone, mail, Internet, or direct business dealings with us.

In some cases, and with your consent, we will need to ask an independent source to verify your personal information. These sources could include your employer, landlord(s), financial institutions, and credit reporting agencies.

Collection, Use, and Disclosure of Personal Information

We use and disclose tenant personal information only for the purposes for which the information was collected, except as authorized by law. The law allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

Generally we collect, use, and disclose your personal information to:

- ® Confirm your identity as a resident of North American Leaseholds;
- ® Process your application for the rental of an apartment;
- ® Maintain the security of your residence;
- ® Verify the identification of your vehicle(s);
- ® Establish, maintain, and manage our relationship with you and provide you with ongoing services;
- ® Assist us to understand the current and future needs of our customers, for example to accumulate demographic information that does not identify you personally.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

We will only keep your personal information in our records for as long as it is needed to fulfill the identified purposes, or as required or permitted by law. Personal information that is no longer required will be destroyed or erased.



Purpose and Consent

We will only collect, use, and disclose your personal information with your consent, or as permitted or required by law. Your consent may be expressed in writing, or it may be given verbally or electronically. We may assume your consent where you volunteer information for an obvious purpose (for example, providing a personal cheque for the payment of your rent).

In cases where we collected your personal information before January 1, 2004, we assume your consent to our use and, where applicable, disclosure for the purpose for which the information was collected.

We ask for your express consent for most purposes. Where express consent is needed, we will request our tenants and prospects to provide their consent by signing the Rental Application form.

We may collect, use, or disclose your personal information without consent only as authorized by law. For example, we may not request your consent when the collection, use or disclosure is reasonable for an investigation or legal proceeding, to collect a debt owed to our organizations, in an emergency that threatens life, health or safety, or when the personal information is from a public telephone directory.

You may withhold or withdraw your consent for us to collect, use and disclose your personal information, as long as there are no legal or contractual reasons preventing you from doing so. Depending on the circumstances, however, withdrawal of your consent may impact our ability to continue to provide you with our services. If you decide to withdraw your consent, we will explain the consequences of your withdrawal. For example, if you withdraw your consent to have your name and home address disclosed to our security company, we will be unable to provide you with access to your residence if your keys are lost after normal business hours.

Your personal information will be kept confidential and secure. It will only be provided to, or be accessible by:

- Ⓒ Our employees who need some or all of this information in the performance of their duties;
- Ⓒ Service providers which need the information in the performance of their duties to maintain your residence, and to satisfy their obligations to us;
- Ⓒ Any person or organization to whom you gave consent; and
- Ⓒ Anyone who is otherwise authorized by law.

Accessing and Amending Your Personal Information

We will make all reasonable efforts to ensure that any personal information we collect and keep is accurate, complete, and as up-to-date as required for the identified purposes. To a large extent we must rely on you to provide us with accurate information and to inform us of any changes.

You have the right to access and verify your personal information kept in our files, and to request that any inaccurate information be corrected, if appropriate. Depending on the circumstances, we may not be able to give you access to all information. Should this occur, we will explain the reasons why. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual. Also, organizations are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may access your personal information, or withdraw your consent to collection, use and disclosure of your personal information at any time, subject to legal or contractual restrictions and reasonable notice, by writing to the Privacy Officer at Alberta Lands Inc. You must provide sufficient information in your request to allow us to identify the information you are seeking to review. You must also provide us with your contact information so we can respond to your request.

You may also request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We will charge a reasonable fee to provide this information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.



Protecting Your Personal Information

We protect your personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information.

We are committed to protecting your personal information from unauthorized access or use, by ensuring that the necessary physical, organizational and technological safeguards are in place. Essentially, this means that your personal information is protected:

- ® Physically, by building security measures and physical barriers such as locked filing cabinets, vaults and doors, and security alarm systems;
- ® Organizationally, by our internal policies, procedure and access levels. Only those employees who need access to your personal information have access to it; and
- ® Technologically, by having appropriate and up-to-date computer passwords, network security, data encryption, firewalls to restrict access from outside persons, and anti-virus software. Computer passwords are changed on a regular interval.

We use appropriate security measures when destroying tenant personal information, including shredding paper records and permanently deleting electronic records.

All of our employees, representatives, contractors, and service providers, who act on our behalf, are required to abide by our privacy policies and practices.

If we receive a request to release your personal information, we will only do so upon satisfactory identification and proof of entitlement of the requestor, or as required or permitted by law.

Questions and Complaints

If you have any questions or concerns about any collection, use or disclosure of personal information by Alberta Lands Inc., and North American Leaseholds, or about a request for access to your own personal information, please contact The Privacy Officer at Alberta Lands Inc. in the first instance:

The Privacy Officer
Alberta Lands Inc.
9924 – 101 Avenue
Grande Prairie, Alberta, Canada T8V 0X8
Phone: (780) 532-7311
[Email: privacy.officer@albertalands.com](mailto:privacy.officer@albertalands.com)

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 500, 640 – 5th Avenue S.W.
Calgary, Alberta T2P 3G4
Phone: (403) 297-2728
Email: generalinfor@oipc.ab.ca

Toll Free: 1-888-878-4044
Web site: www.oipc.ab.c