

PRIVACY POLICY

Introduction

This Privacy Policy (the “**Policy**”) sets out the personal information practices for First Capital Realty Inc. (“**FCR**”) and its affiliates. These practices seek to balance an individual’s right to the privacy of his or her personal information and the need for FCR to collect, use, disclose and otherwise manage such personal information in respect of services offered by FCR. FCR may update this Policy from time to time and will post the current version on its website at www.firstcapitalrealty.ca. This Policy was last amended on the date shown at the end of the Policy.

What is Personal Information?

“*Personal Information*” is any information which relates to a natural person and allows that person to be identified, including for example the name, address, banking details, government-issued ID, but does not include information excluded by applicable privacy laws, such as your title, business telephone number and address as an employee of an organization.

How Does FCR Collect Personal Information?

FCR collects Personal Information for the purpose of providing information about its services, applying for or receiving services from FCR, such as on a lease application or a pre-authorized debit (“*PAD*”) agreement and in the course of FCR providing you with services.

FCR will collect only the Personal Information necessary for the object of the file for which it is collected.

If you use the FCR website inquiry form to request information about services offered by FCR, you consent to the collection, use, disclosure and management of your personal information in accordance with this Policy.

FCR also collects personal information from others, including from financial institutions, credit reporting agencies, and references you have provided. FCR will do so with your express consent where required by law. FCR may collect Personal Information from third persons without your consent where permitted by law.

If FCR collects any Personal Information from a third person which is a person carrying on an enterprise, it will make an entry indicating the source of such Personal Information.

Use and Disclosure of Personal Information

Personal Information collected by FCR will only be used or disclosed for purposes described in this Policy, for other purposes disclosed to you at the time of collecting such Personal Information, for example, as described on a lease or PAD agreement, or for purposes to which you have otherwise given your consent. Notwithstanding the preceding, FCR may use or disclose Personal Information without your consent where it is permitted or required by law. Refusing to provide or withdrawing your consent in respect of FCR’s collecting or use of certain Personal Information may result in FCR being unable to conduct business with you.

Access to Personal Information will be limited to persons who need such Personal Information in order to allow FCR to provide you with its services.

FCR may disclose your Personal Information to its affiliates, service providers, advisors, agents or representatives, as required, to initiate business with you, administer your lease, carry out FCR's and its affiliates' business operations (including organizational restructuring, financing or other transactions), communicate with you, and as required for FCR and its affiliates to meet regulatory or legal obligations. FCR may disclose Personal Information to third parties in connection with the potential sale or sale of all or part of its business.

In the event FCR's affiliates or service providers are located in a foreign jurisdiction, they are subject to the laws of the jurisdiction in which they are located including laws regulating use and disclosure of Personal Information. FCR will not however, transfer information collected in the province of Quebec outside of that province without first taking reasonable steps to ensure that the Personal Information will receive adequate protection and that it will not be used for purposes not relevant to the object of the file or communicated to third persons without your consent, except as provided by law.

FCR will retain Personal Information for as long as needed to satisfy the purposes in connection with which it was collected or as otherwise permitted or required by law.

Accuracy and Accessing Your Personal Information

FCR will endeavour to ensure that the Personal Information it relies on is accurate. You can ask to view Personal Information about you held by FCR by writing to FCR's privacy officer, whose contact information is provided at the end of this Policy. FCR will give access to Personal Information in alternative form to an individual with a sensory disability as required by law.

You can request that corrections be made where you can show that the Personal Information about you is incorrect or incomplete. Please note that under certain circumstances, you may not be permitted to view your records, such as where the disclosure of your records would cause security, legal or confidentiality concerns, or could seriously harm a third party, and including where FCR is prohibited by law to disclose that to you or permitted by law to not disclose.

More Information About FCR's Privacy Practices

Please contact FCR's privacy officer in writing at: Privacy Officer, First Capital Realty Inc., 85 Hanna Avenue, Suite 400, Toronto, Ontario M6K 3S3, Canada, or at PrivacyOfficer@firstcapitalrealty.ca with any questions or concerns you have about this Policy or about FCR's handling of your Personal Information. FCR will investigate and respond to your concerns.