

Privacy Policy

External Communications and Privacy Policy

PURPOSE

The External Communications and Privacy Code Policy ("Privacy Code") sets forth the policies of Saskatoon Real Estate Services Inc and its affiliated entities (collectively, "SRES") regarding how SRES representatives may communicate with our clients, and other non-SRES' third parties, in a consistent, accurate, fair and timely manner and aligned with all Canadian legislative regulations.

This Privacy Code sets out the principles that govern the collection, use and disclosure of our Clients' personal information and applies to all SRES' employees, directors, officers, consultants and contractors.

GENERAL POLICY

It is SRES' policy that all its communications with third parties comply with the requirements of Canada's privacy legislation, the *Personal Information Protection and Electronic Documents Act* ("PIPEDA"), the *Canada's Anti-Spam Legislation*, passed in 2010 and effective July 1st 2014 ("CASL"), and our own commitment to protecting our clients' privacy.

OBJECTIVE

The primary objective of this Privacy Code is to inform our clients about our privacy practices, why SRES collects personal information, and how such information is protected. In addition, we want to ensure that SRES continues to have our clients' consent to continue to collect, use and disclose our clients' personal information for those explicit purposes.

DEFINITIONS

Personal Information' means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization.

PROCESS

1. Why does SRES collect Personal Information?

Under Canada's privacy laws, marketers are required to identify to individuals, either through a dialogue box or prominent notice backed up by a more detailed privacy policy, why Personal Information is being collected and the intended purpose(s) for said Personal Information. This information must be presented to an individual prior to or at the time of Personal Information

collection. Any disclosure of clients' Personal Information outside of SRES is made on a confidential basis, with said information to be used only for the purpose for which it was disclosed.

SRES collects Personal Information for the following purposes:

1.1. To establish and maintain a responsible commercial relationship with our clients and to provide ongoing professional services. For example, when a client applies for our services, SRES collect information that allows it to confirm the client's identity and billing information so that SRES can accurately bill for its services and comply with *FINTRAC* anti-money laundering legislation.

1.2. To better understand our client's needs and preferences, SRES maintains a record of professional services that our clients receive from SRES and we may ask for additional information (for example, through surveys and feedback requests) so that we can better meet those needs, and continue to develop improved services to our clients

1.3. To meet legal and statutory requirements. For example, this will include information required by the Canadian Radio-television and Telecommunications Commission.

2. Why and when do we disclose Personal Information?

SRES may disclose Personal Information for the following purposes:

2.1. SRES may disclose its clients' Personal Information to a person who is a legitimate representative of the client.

2.2. Subject to provincial *Real Estate Act Legislation*, clients' Personal Information may be shared among SRES offices and business units to help us serve our clients better and to provide them with professional services.

2.3. SRES may disclose a client's Personal Information to:

2.3.1. Another Commercial Real Estate Services provider who are party to the client's prospective transaction.

2.3.2. A company or individual employed or associated with SRES in order to perform or fulfill services on its behalf, such as research, design or marketing.

2.4. SRES may disclose a client's Personal Information to meet legal or regulatory requirements. For example, when responding to a court order or a government institution, if required to do so, by law.

2.5. As part of any sale, merger or amalgamation of any part of our business, a client's Personal Information will normally be a part of such transactions and therefore will be disclosed only for such a purpose.

3. How does SRES protect its Clients' Personal Information?

3.1. SRES will not collect, use or disclose our clients' Personal Information for any purpose other than those identified above, except with the client's consent.

3.2. SRES will protect our clients' Personal Information with appropriate security measures.

3.3. SRES will comply with any reasonable and lawful client request to access their Personal Information.

3.4. SRES will protect the confidentiality of our clients' Personal Information when dealing with third party companies.

3.5. SRES will endeavor to keep our clients' Personal Information as accurate and up-to-date as necessary for the purposes listed above.

Personal Information collected by SRES may be stored and processed in Canada or another country. In either case, such information is protected with appropriate security measures, but may be available to government agencies under applicable law.

4. Collecting Clients' Personal Information?

SRES professional staff must receive explicit consent from our client contacts, prior to sending any marketing email correspondence to our clients.

A client may choose to be excluded from our external communications and withdraw consent at any time, subject to legal or contractual obligations.

SRES has developed information systems to help manage unsubscribing client data centrally in Canada.

5. SRES' Anti-Spam Policy

SRES has a strict zero-tolerance policy against spamming. All professionals must refrain from using our operating and messaging systems, including but not limited to email, instant messaging, or texting (collectively, "Electronic Address") to distribute any unsolicited commercial electronic messages for which consent has not been received. This includes all one-to-one email communications with clients and mass emailing. Our professionals are prohibited from sending unsolicited electronic messages of any kind, including mass emails, in connection with the marketing of our programs, products and services or to encourage the participation in any commercial activities.

SRES considers spamming to be any activity whereby a professional, directly or indirectly, transmits an electronic message to any Electronic Address for which prior consent of such electronic message has not been granted.

CORRESPONDENCE

If you have further questions or concerns about SRES External Communications and Privacy Practices, or receiving unsolicited electronic messages, please contact us at the following email address: reception@sres.ca