

## **Times Group Corporation® Privacy Policy**

The following Privacy Policy (“Privacy Policy”) summarizes the practices of Times Group and Life Construction Inc. and the affiliate companies using the Times Group® trademarks under license from the Times Group Corporation (referred collectively as “Times Group”) as they relate to the collection, use and disclosure of personal information.

For the purposes of this Privacy Policy, "personal information" means information that is personally identifiable to individuals. "Non-identifiable information" means information that cannot be associated with or traced back to specific individuals with any certainty.

**Section 1. Personal Information Collection.** Times Group collects and receives personal information from individuals on a voluntary basis through registrations, emails, questionnaires, purchase agreements, due diligence and other means. Such personal information may include contact information, age, credit worthiness, tax information, household information, preferences and transaction-related information.

**Section 2. Use of Personal Information.** Times Group may use personal information to (i) communicate with individuals, (ii) cater to customer preferences, (iii) design, market and sell products and services through special offers, and, (iv) complete transactions of purchase and sale or lease. The personal information collected helps Times Group better understand market demands and the Times Group may use personal information to contact individuals by email, direct mail or telephone to promote its projects or services.

**Section 3. Disclosure of Personal Information.** Times Group does not sell, rent or exchange personal information. Times Group will not knowingly disclose any personal information to any third parties unless (i) Times Group has received the express written consent from the individual, (ii) Times Group believes, in good faith, that the law permits or requires such disclosure, (iii) the disclosure is to an affiliate of Times Group and then only for the purposes described in Section 2 above, or (iv) to agents, advisors or agencies necessary to complete transactions, process data or service customers. Any affiliate, agent or advisor (including their respective employees) will be bound by this same Privacy Policy and any such third party will only be provide with such personal information as is necessary to perform the services for which they have been contracted. Notwithstanding the above, in the event of the sale of Times Group or an individual Times Group project, personal information may be one of the transferred assets.

**Section 4. Retention of Personal Information.** When personal information is no longer required for the purposes provided for in this Privacy Policy or pursuant to any other statutory requirement, personal information will be made anonymous or destroyed.

**Section 5. Collection, Use and Disclosure of Non-Identifiable Information.** Times Group collects and uses certain non-identifiable information to assess the effectiveness of web site content. Times Group may also use aggregate non-identifiable information to inform its current and prospective sponsors about the number and nature of visits to its web sites. This information may be used to describe Times Group services and products to third parties such as prospective business partners and financial institutions, however only non-identifiable information in an aggregate form and not personal information is disclosed.

**Section 6. Third Party Websites.** Times Group web sites contain links to other sites that may collect personal information. This Privacy Policy does not extend to the data collection, disclosure, use and retention practices of such third parties. Times Group does not assume any responsibility practices, policies or actions of such third parties.

**Section 7. Safeguarding Personal Information.** Times Group has taken reasonable measures to protect the security of personal information. Personal information is stored in confidential databases and locations in the Greater Toronto Area. These sites have appropriate security measures in place to protect against the loss, misuse and alteration of personal information under the care and control of the Times Group. Any information transmitted via the Internet, however, may be intercepted by third parties and Times Group does not assume any liability for interception, alteration or misuse of information transmitted over the Internet. Times Group employees are restricted from using and disclosing personal information other than in accordance with this Privacy Policy.

**Section 8. Accessing Personal Information.** Any individual may access, verify and correct or amend all of their personal information held by Times Group. In order to keep personal information as current as possible, Times Group encourages individuals make corrections in their personal information by sending an email to our Privacy Officer at [privacy@timesgroupcorp.com](mailto:privacy@timesgroupcorp.com).

**Section 9. How to File a Complaint.** To file a privacy complaint please email, send an email to our Privacy Officer at [privacy@timesgroupcorp.com](mailto:privacy@timesgroupcorp.com). All complaints will be investigated and individuals will be notified of the outcome of the investigation of complaints clearly and promptly.

**Section 10. Opting Out.** You have the choice to supply Times Group with personal information. Individuals wishing to opt-out of receiving electronic or hard copy materials from Times Group or who otherwise object to the collection, use and disclosure policies as provided under this Privacy Policy, are asked to contact our Privacy Officer at [privacy@timesgroupcorp.com](mailto:privacy@timesgroupcorp.com). Individuals may opt-out of specific promotional mailings and email campaigns. Individuals are reminded that the decision to withhold personal information or to object to the use and/or disclosure of personal information as provided in this Privacy Policy or in any other agreement between such individuals and Times Group may limit their ability to access or take advantage of certain promotions and features. All personal information is obtained and used only with your consent. Your consent may be expressed or implied depending on the circumstance.

**Section 11. Comments and questions.** Any comments or questions about this Privacy Policy should be addressed to Times Group as follows (i) by emailing our Privacy Officer at [privacy@timesgroupcorp.com](mailto:privacy@timesgroupcorp.com), or (ii) by mailing our Privacy Officer at Times Group Corporation, 3985 Highway #7 East, Suite 202, Markham, Ontario L3R 2A2, Attention: Privacy Officer.

**Section 12. Effective date of Policy.** This Privacy Policy has been adopted by Times Group as of June 3, 2014. We reserve the right to modify or amend this policy at any time by posting the revised privacy policy on [www.timesgroupcorp.com](http://www.timesgroupcorp.com) as soon as practical.