



## **GOVERNANCE RULES AND CONFIDENTIALITY POLICY OF NEX CONDOMINIUMS REGARDING THE PROTECTION OF PERSONAL INFORMATION**

### **PREAMBLE**

The purpose of these rules of governance and the confidentiality policy regarding the protection of personal information (the "Policy") is to determine the principles that NEX Condominiums inc. and its representatives will follow when collecting, using, communicating, retaining and destroying personal information.

Among other things, the Policy provides a framework for NEX Condominiums inc.'s obligations, particularly with respect to the roles and responsibilities of the person responsible for access to and protection of personal information (the "PPI Manager") and his or her employees in handling personal information. The rights of persons concerned by personal information collected, used, communicated, retained, and destroyed by NEX condominiums inc. are contained in the Policy, as is the process for handling complaints relating to the protection of personal information.

The Policy applies to all personal information relating to customers, suppliers, platform users, staff and employees (the "Data Subjects").

### **1. CONSENT**

By visiting or using the NEX condominiums inc. website or otherwise communicating with us, including to obtain information or conduct a transaction on properties for sale or rent, you agree to be bound by this Policy and consent to the collection, use, disclosure, retention and destruction of your personal information as described in the Policy.

### **2. RESPONSIBILITIES OF NEX CONDOMINIUMS INC. AND THE PERSON RESPONSIBLE FOR THE PPI**

NEX condominiums inc. is responsible for the protection of personal information in its possession, whether it is held by NEX condominiums inc. or by a third party, and regardless of the form in which it is held (written, graphic, sound, visual, computerized, or other).

As such, NEX condominiums inc. takes appropriate security measures to protect such information in a manner commensurate with its sensitivity and has adopted this Policy.

The PPI Manager of NEX condominiums inc. ensures that these rules and NEX condominiums inc. obligations regarding the protection of personal information are respected and implemented. In particular, he participates in the prevention and appropriate management of privacy incidents, the complaint handling process and Privacy Impact Assessments ("PIAs") as required.

### **3. CHANGES TO THE POLICY**

NEX condominiums inc. reserves the right to make changes to the Policy at any time by notifying its users on this page and/or by sending a notice to the Persons concerned through any contact information at our disposal. It is recommended that you consult this page regularly, referring to the date of the last modification. If the modifications affect the initial consent, NEX condominiums inc. will collect a new consent, if necessary.

### **4. THE INFORMATION WE COLLECT**

NEX condominiums inc. only collects personal information that is necessary to carry out its activities in the sale and management of Nex condominium real estate development. For example, information may be collected for the purpose of completing a real estate transaction, for record-keeping purposes, for the monitoring of professional practice by the “Organisme d'autoréglementation du courtage immobilier du Québec” (OACIQ), or for any other purpose determined by NEX Condominiums Inc. and made known to the person whose consent is being sought. Your information may also be used to invite you to our events.

We collect the following information, in whole or in part, when you use our platforms or otherwise communicate with us.

- a. First name and surname
- b. Date of birth
- c. Telephone number
- d. E-mail
- e. Personal mailing address
- f. Principal occupation and professional title
- g. Social insurance number
- h. Property purchased or sold
- i. Transaction price
- j. Comments and e-mails
- k. Driver's license no.
- l. Permanent resident card
- m. Passport
- n. Health insurance card

### **5. ACCURACY OF PERSONAL INFORMATION**

We are committed to keeping your personal information accurate, complete and up to date. If your information changes, please notify us immediately so that we can make the necessary changes.

### **6. ACCESS AND RECTIFICATION**

To access or obtain a copy of the personal information we hold about you, or to have inaccurate personal information amended, you may send us a written request. You may also ask how this

information is used and ensure that it is accurate and complete, and update it if necessary, to the extent permitted by law.

## **7. SECURITY MEASURES**

NEX condominiums inc. maintains strict security measures to protect your personal information from unauthorized access, use, disclosure, modification, loss, theft, or any other breach of security. The information we collect is protected by computer security measures that are reasonable in light of its sensitivity.

Physical and physical security measures include:

- Access-controlled offices and locked filing cabinets;
- restricting access to your personal information to a select group of people;
- written contractual obligations with third parties who require access to your personal information, requiring them to protect, through security measures, the confidentiality and security of your personal information and to use it only for the purposes of the contract, mandate or service they are performing.

Computer security measures include :

- the use of passwords;
- regular review of our security practices;
- regular upgrading of our technological equipment;

## **8. DISCLOSURE TO THIRD PARTIES**

Personal information is used and communicated for the purposes for which it was collected and with the consent of the person concerned. In certain cases, provided for by law, personal information may be used for other purposes, for example, to detect and prevent fraud or to provide a service to the person concerned.

NEX condominiums inc. may be required to disclose personal information to third parties, for example, suppliers, contractors, subcontractors, agents, insurers (such as the Fonds d'assurance responsabilité professionnelle du courtage immobilier du Québec [the FARCIQ]), professionals, other regulators, or outside Quebec.

NEX condominiums inc. may, without the consent of the person concerned, communicate personal information to a third party if such communication is necessary for the execution of a mandate or a contract for services or business. In such cases, NEX condominiums inc. will draw up a written mandate or contract in which it will indicate the measures to be taken by its agent to ensure that the personal information entrusted to it is protected, that it is used only for the purposes of the mandate or contract and that it is destroyed once the mandate or contract has ended. The co-contractor must also undertake to cooperate with NEX condominiums inc. in the event of a breach of confidentiality of personal information.

Before disclosing personal information outside Quebec, NEX condominiums inc. considers the sensitivity of the information, the purpose for which it is to be used and the safeguards that will be in place outside Quebec. NEX condominiums inc. will only disclose personal information outside Quebec if its analysis demonstrates that the information will be adequately protected in the location where it is to be disclosed.

## **9. WITHDRAWAL OF CONSENT**

You may change or withdraw your consent to the collection, use and disclosure of your personal information at any time by sending written notice to the PPI Manager. We will process your request as soon as possible.

## **10. DESTRUCTION OR ANONYMIZATION**

Once the purposes for which the information was collected have been fulfilled, NEX condominiums inc. will securely destroy or anonymize the information as permitted by law to use it for serious and legitimate purposes. In this respect, NEX condominiums inc.'s professional obligations require it to keep its files for at least ten (10) years following their final closing.

## **11. CONFIDENTIALITY INCIDENT**

A privacy incident is any access, use or disclosure of personal information that is not authorized by law, or any loss or other breach of the protection of personal information.

NEX condominiums inc. has established a protocol for managing a privacy incident, which identifies the persons who assist the Privacy Officer and sets out the concrete actions to be taken in the event of an incident. This protocol sets out the responsibilities expected at each stage of incident management, including the measures to be taken to ensure data security.

## **12. EVALUATION PROCESS**

NEX condominiums inc. will carry out a PIA assessment in the event of any acquisition project or redesign of our computer systems involving personal information. This will be done in consultation with the PPI Manager, based on the sensitivity of the information concerned, its quantity and its purpose.

## **13. COMPLAINTS AND PROCESSING**

Any Person concerned by personal information collected, used, communicated, or retained by NEX condominiums inc. may file a complaint with the PPI Manager. The complaint must be made in writing and must indicate the nature of the facts complained of the date on which the incident occurred, and the expectations as to the outcome of the complaint. The PPI Manager will acknowledge receipt of the complaint and process it within a maximum of 20 days.

NEX condominiums inc. investigates all privacy complaints and takes appropriate measures to resolve them. For further information on how we handle personal information, please contact:

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