

# Privacy Policy

## Full Text of Privacy Policy *Last Updated: September 20, 2023*

This Privacy Policy applies to SERO Growth, ("we", "us" or "our") and sets out the principles by which SERO Growth handles privacy matters.

The purpose of this Privacy Policy is to inform you of how we collect, use, disclose, retain, protect and otherwise handle personal information.

We want you to be well informed about your rights, why we collect personal information and how we treat it. Please read this Privacy Policy carefully. We know that protecting personal information is extremely important to our customers, tenants, visitors, service providers, and all others who interact with us (collectively, "you" or "your"). We want to be clear and transparent about all of our practices with respect to your personal information.

### **Important**

By submitting personal information to us, including by visiting our facilities or websites, you agree and acknowledge that we may collect, use and disclose such personal information in accordance with this Privacy Policy and applicable laws. If you do not agree to the terms of this Privacy Policy, you may not use our services or products and you must not visit our websites or properties.

Please note that our websites may contain links to other websites that are provided for information purposes only. The privacy policies and practices of third-party websites may differ from ours, and you should review them carefully.

### **1. What is personal information?**

Personal information is information about an identifiable individual or information that identifies an individual. Among other things, personal information includes your name, home address, telephone number, email address, licence plate number, video image, banking information, and credit information.

Personal information may also include other types of more technical information, such as IP addresses, geolocation, device IDs or browsing history, and cookies, but only when that information can identify you as an individual. Non-personal information does not directly or indirectly reveal your identity or is not directly linked to an identifiable individual. Examples of non-personal information are statistical or aggregated data, including data obtained from personal information.

## 2. What information do we collect?

The type of personal information we collect depends on your interactions with us. While this Privacy Policy is intended to provide a detailed description of the personal information we collect, please keep in mind that we may also collect other information as we develop new products, services, and techniques to provide you with new, enhanced, and personalized services.

First, we collect information when you provide it to us directly, such as by filling out forms or submitting a request to us, such as a request for information. You also provide us with information when you interact with us through public websites, including social media and social networking sites.

Second, we collect information through video recordings, cookies, or other automated technologies when you navigate our web applications or during virtual meetings. Information collected automatically may include certain demographic and other similar information and anonymous traffic analytics, usage information, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

Third, we also collect information about you from third parties. Third-party sources may include public databases, identity verification partners, resellers, channel partners, joint marketing partners, internet search engines, and social media platforms. We receive personal information when you link us to a third-party service, which may include interactions with our social media sites. Please remember that third-party websites are governed by their own privacy policies; You should review these policies before using these sites.

## 3. We collect and use the information you provide to us

### **When you create an account**

When you create an account with us, including through our mobile applications (each an "Account"), we may ask you for your name, email address, title, date of birth, home address, phone number, password, and information about your interests or background. Depending on the type of account you create, we may also ask you to provide us with certain biographical, employment and education information. If you log in to our web applications, mobile applications, or Wi-Fi network through a social media account (such as Facebook, Instagram, or LinkedIn), we collect profile information from those accounts and other information that you have consented to provide to us to create your account.

### **When you submit a request**

We collect personal information that you provide as part of your job application. Subject to applicable law, this personal information may include information about your current employment, previous work experience, education, professional licenses and certifications, and other related information. We use this information to assess your suitability and determine whether we wish to proceed with your application. Once we have made a decision about your request, we may retain your personal information in accordance with our retention policy.

## **When you contact us**

If you request customer support or services, we collect the information necessary to respond to your request. The information we collect will depend largely on the nature of your request. This may include, but is not limited to, your contact information, the details of your request, including the circumstances or causes that led to your request, how you contacted us, our response, and information regarding the resolution of your request.

If you visit one of our offices, we may collect your contact information, such as your name, address and telephone number, and ask you to answer certain screening questions. We collect this information for security and safety reasons and to comply with certain public health guidelines.

We may collect information when you register for a newsletter, contest, webinar, or service. This information may include your contact information. If you sign up for email communications, we generally only collect your email address. If you participate in a contest or promotion, we will collect your personal information to administer the contest or promotion.

We may collect information if you interact with us on social media. We may view and share posts that mention our services or properties. We can only view and share this information if your privacy settings allow us to see your posting. We use this information for marketing purposes, to understand visitor trends and what visitors and tenants are saying about our properties and services. We may also engage third parties to analyze social media and other sources of information to identify threats to our assets and personnel.

## **4. We Automatically Collect Information When You Visit Our Websites**

When you use our websites or apps, we automatically collect information from your device or the session you have opened as part of the normal online content delivery process. In some cases, we may also analyze this information to detect cybersecurity threats. We automatically collect two main types of information: technical information and usage information.

### **Technical Information and Usage Information**

Technical information includes, but is not limited to, IP address, browser type and version, advertising IDs, application or device information (e.g., device model, browser type, IP address, and physical location of the device). Among other things, this technical information allows us to properly format our content for your device.

Usage Information includes data about the length of your visits to our websites and apps, the pages you visited, the features you used, the searches you performed, and your other activities. We collect this information because it helps us understand how you use our websites and apps; They also help us better meet your needs and improve our business. Usage information also helps us understand which advertisements and promotional communications have been effective, allowing us to tailor your experience to your interests, including the advertisements

you see. We collect both technical and usage information through a variety of means, including through the use of cookies and pixel technology.

## **Witnesses**

Cookies (or cookies) are small text files sent from a site to your device's hard drive (e.g., computer or phone) to store information about you. First-party cookies are placed directly on your device by our website, which allows us to collect analytics data and provide other useful features that create a good user experience.

Third-party cookies are placed on your device by a third party (e.g., advertiser or analytics system). Third parties that place cookies on our site may link your name or email address to other information they collect, such as previous purchases made offline or online, or information about your web usage. We may use a third-party cookie to obtain reports about where visitors to our website come from and which web pages and mobile application features are useful. Some of the third-party cookies that our website may use include those provided by Facebook, Twitter, LinkedIn, Google, and Bing.

Cookies are very useful and can be used for a variety of purposes. These include allowing you to navigate between pages efficiently, facilitating the automatic activation of certain features, remembering your preferences, and making the interaction between you and the website faster, easier, and smoother.

Most browsers can be set to reject some or all cookies. Some cookies are required, and others are optional. Necessary cookies are used to ensure that our digital services function properly and to track certain page analytics. Optional cookies include cookies used for advertising and to recognize you when you use different devices. If you choose to modify your browser to reject all cookies, some pages of our website may not function optimally or at all. Please note that due to a lack of industry consensus on this issue, our websites do not currently respond to web browsers that do not track signals.

## **Pixels**

Pixels or web beacons are small image files that appear on our web pages or in advertisements. We may use these technologies for a variety of business purposes, including remembering your device, keeping you logged in, tracking how you use our websites and apps, and providing online advertising. to see if our emails have been read or links clicked on in the content of our promotional emails and advertisements, and to record your location. Among other things, we may use pixels provided by Facebook and Google. If, for example, we advertise on Facebook, the advertisement and our website may contain pixels so that we understand that a visitor to our website has seen the advertisement on Facebook. This helps us know that the ad was useful and relevant.

## 5. We Automatically Collect Information When You Visit Our Properties

Our properties are equipped with CCTV technologies that will collect your image and that of your vehicle (including your license plate) when you are on one of our properties. We collect this information for security purposes. In some cases, the field of view of cameras on our property may capture images of people who are near the perimeter of our properties. We also use security guards to monitor and protect our buildings. If there is an incident, these security officers may gather information about the people involved in the incident, information from witnesses, and other information they receive or about what they have observed. We use the information we collect as part of building security programs to help secure and protect our property, to create a safe environment for our tenants, building occupants, and visitors, to respond to emergencies, to investigate violations of our policies or laws, and to investigate claims. (such as property damage or injury).

Access to certain properties or areas of our properties is restricted. To access these properties or areas, you may be required to provide us with additional information and, in some cases, we may issue you a physical or digital pass. We will collect information about you and your company (if applicable), which will allow us to issue you a pass. Our pass readers collect records of the dates and times of use of these cards.

### Information We Collect Through Anonymous Video Analytics Technologies

We may use cameras, image sensors and other technologies (anonymous video analytics and anonymous traffic analysis) at our physical locations, information kiosks or advertising facilities to measure your engagement and interest in certain visual media and other elements and aspects of our properties, as well as to measure the demographics of viewers, including their age and gender. These technologies are strictly used for general analysis purposes (i.e., for purposes other than identifying individuals) and do not store images of individuals for an extended period of time.

We may also use other technologies to analyze traffic in a de-identified manner, including by tracking the devices that have communicated with our WiFi systems. For example, we may use third-party service providers to generate traffic analytics based on your mobile device's Media Access Control (MAC) address, which is broadcast by WiFi devices when your mobile device is enabled. When you drive or park on our properties, we may collect information about your vehicle, such as make, model, and license plate.

We collect and use this information to improve our services, justify the value of advertising space and manage content scheduling, and improve resource allocation and management, for health and safety reasons. Please note that we may share aggregated statistical information collected through the use of these technologies with our business partners, including advertisers.

## 6. Why is your information collected and used?

We collect, use and disclose information in order to better serve you and to fulfill our obligations to you and other parties and under applicable laws. Knowing that you are helping us understand your needs allows us to communicate effectively with you and provide you with

the services you want. In addition to the purposes set out in this Policy, we collect, use and disclose your personal information for the following purposes (the "Identified Purposes"):

- assess, establish and maintain an employment or business relationship;
- determining service rates, administering accounts, making and receiving payments, and fulfilling contractual obligations;
- provide you with the services you have requested, including responding to inquiries and other requests for assistance;
- researching, developing, managing, protecting, and improving our services, including conducting surveys that provide us with feedback;
- update and verify our databases and information provided by third parties;
- ensure the consistency and quality of our products and services or those of our suppliers;
- Develop and manage our knowledge and precedent management systems and databases;
- establishing, managing and enforcing parking arrangements;
- investigating and resolving complaints;
- compile statistics, conduct market research and report to the owners of the buildings we manage;
- deliver personalized messages and interest-based advertising, newsletters, promotional information, coupons, and other materials;
- track your use of our websites, including transaction history and trends;
- monitor your use of our WiFi network on or near our properties;
- Create reports on customer behavior.
- Investigate specific transactions or transaction trends to detect unauthorized, fraudulent, or illegal activity;
- maintaining appropriate operational records;
- facilitating business transactions, including the evaluation, execution, monitoring and management of investments;
- conduct business transactions;

- developing, marketing and selling new products and informing you of new features, including those of third parties; facilitate safety and security;
- perform functions required or permitted by law and for any other purpose to which you consent.

## 7. Legal Bases for Collecting and Processing Your Information

At the time your personal information is collected, subject to applicable laws, we rely on several legal bases to collect and process your information. Generally, we will only collect or process personal information where we are legally required to do so, where the processing is necessary to perform the contracts we have entered into with you (or to take steps at your request prior to entering into a contract with you), for our legitimate interests in operating our business, to protect our property and your property, our rights and your rights or our safety and safety, or where we have obtained your consent, and, in each case, this will only be done to the extent necessary to fulfill that obligation, interest or purpose.

We value you, your privacy rights and interests. Therefore, when we collect or process your personal information based on our legitimate interests, we ensure that we take into account any potential impact on you and your rights.

Where we obtain your consent subject to legal requirements, that consent may be withdrawn as described in more detail below. If you withdraw your consent, this does not affect the lawfulness of any processing we have carried out prior to such withdrawal. Once we have received notice that you have withdrawn your consent, subject to applicable laws and this Privacy Policy, we will no longer process your personal data for the purposes to which you originally consented, unless we have another legitimate reason to do so in law.

## 8. To whom do we share your personal information?

### Third-Party Service Providers

While offering our programs, products, services, promotions, contests, and events, we may share some or all of your personal information that we have collected with third-party service providers who perform services on our behalf.

These service providers help us operate our business. They provide clerical, legal and other professional services, respond to client inquiries, process credit card payments and other forms of payment, perform credit checks, send email and postal mail, operate call and data hosting centers, provide software and technical solutions, manage our marketing and advertising campaigns and analytics services (e.g., tracking the effectiveness of our marketing campaigns and analyzing the use of our websites and apps). We require these service providers, which may be organizations and individuals, to limit their access to and use of your personal information to what is necessary to provide their services, and to comply with personal information and security and data protection procedures.

## **Sale or transfer of a business**

We may disclose your personal information to a third party in connection with a sale or transfer of our business or assets, merger, reorganization, or financing of any portion of our business (including in connection with insolvency or bankruptcy proceedings). If such a transaction were to be carried out, your personal information would remain protected under applicable laws. If such a transaction is not completed, we will request that the other party not use or disclose your personal information in any way and to delete such information in accordance with applicable laws.

## **Law Enforcement**

Sometimes we need to share personal information with police, government agencies or other law enforcement officials. If a criminal incident occurs at one of our properties or technology tools, we may share your personal information related to that incident with the police. We may also share your relevant personal information when you need to complete a police report or respond to a police request.

## **Insurers**

We share information with our insurers, as well as those pursuing or defending a legal action, when an incident occurs at one of our properties and the information is reasonably necessary to make an insurance claim or report. This may include video surveillance, incident reports, and other relevant data that may include your personal information.

Other Permitted Grounds. Except as noted above, from time to time, we may disclose your personal information to:

- a financial institution, in confidence and solely in connection with the receipt of payment, the provision of security or other financing arrangements;
- a person who, in our reasonable judgment, provides or requests the information as an agent;
- any other party or third party, when you consent to such disclosure or when disclosure is required or permitted by law.

We will not share your personal information with any unaffiliated third party without your prior consent, except as provided in this Privacy Policy or as permitted by applicable law.

## **9. Your rights**

### **Right to Access Your Personal Information**

If you wish to access any personal information we hold about you, you may submit a written request to SERO Growth's Privacy Office using the contact information set out below. To avoid



delays in obtaining your information, please provide sufficient detail to allow us to identify you and find the specific information you are requesting.

Once your request has been verified, we will provide you with a reasonable opportunity to review your personal information. You will generally have access to your personal information within 30 days of receiving your request. We may extend this 30-day period for up to an additional 30 days if meeting this period would unreasonably interfere with our business operations or if the time required to undertake the consultations necessary to respond to your request makes this period impossible to meet.

Please note that there may be instances where access may be restricted in accordance with the law. We will inform you of the reasons why we are restricting access due to legal or regulatory restrictions. Among other reasons, we may restrict your right to access information that is prohibitively expensive to provide, contains references to others, and cannot be disclosed for legal, security or commercial proprietary reasons, or that is subject to legal privilege.

We do not charge an administrative fee for processing your access request. However, if you require copies of your personal information or need access to your information in a specific format, we will provide you with an estimate of the cost of responding to your request and obtain your consent before incurring any costs on your behalf.

### **Right to correct incorrect information**

To minimize the possibility that inappropriate information will be used to make a decision about you, we take steps reasonably necessary to ensure that the information we collect is accurate and complete for the purposes for which it is collected.

We know that some of the purposes for which we collect your information, such as when you submit a request for services to us, are very important to you, and we take this into account. We also take reasonable steps to ensure that your personal information remains accurate, complete and up-to-date. However, we do not regularly update personal information without a business reason.

If the personal information we hold about you is inaccurate or incomplete, you have the right to have it corrected. If we have disclosed your personal information to others, we will inform them of this correction to the extent possible. If you ask us, and if it is possible and legal to do so, we will also inform you to whom we have disclosed your personal information so that you can communicate directly with them.

### **Right to deletion**

You may contact us to withdraw your consent to the use of your personal information or to request that we delete your personal information if we no longer need it.

Sometimes, we will still need to retain your personal information after you have asked us to stop using and delete it. If so, we'll tell you. For example, we may be required by law to retain your personal information, or we may need this information for our accounting records. We may also retain information if we believe there is a risk of litigation or that the information is related to an investigation. If your information is in electronic form, it may be stored in our backup data. If so, we will retain them until we replace or dispose of our backups.

### **Right to object**

You have the right to ask questions, request additional information, and challenge our compliance with this Privacy Policy and any applicable laws. We will investigate all complaints about the handling of your personal information in a manner that is fair and equitable, and that takes into account your privacy rights and interests, and we are committed to resolving those complaints. If we determine that a complaint is justified, we will take appropriate action, including amending our policies and practices, if necessary.

If you are not satisfied with the explanations provided or the steps we take to correct a situation, you will be informed of your other rights, including the right to file a complaint with the appropriate regulatory body, and you will be given clear instructions on how to do so.

### **Unsubscribe from marketing emails**

You have the right to unsubscribe from communications we send you. For example, if you have subscribed to one of our email newsletters and no longer wish to receive them, you can unsubscribe at any time. The quickest way to unsubscribe is to use the unsubscribe link in the last email we sent you. You can also contact us and we will process your request.

### **Non-discrimination**

You have the right not to be discriminated against for asserting your rights, and we will not retaliate or discriminate against you if you choose to exercise any of your rights.

### **Location-specific rights**

Depending on where you live, you may have additional legislative rights related to your personal information. For example, you may have the right to opt-out of the sale of your personal information. You can learn more about these rights and exercise them at any time by contacting us. Please note that we may refuse to comply with your requests in whole or in part, as permitted by applicable law.

## **10. Where do we store your personal information?**

Your personal information is stored in secure locations and/or on servers controlled by SERO Growth, located in our offices or in the offices of our service providers (which may be located

outside of Canada). We retain your personal information only as long as necessary to fulfill the purposes set out in this Privacy Policy or as long as it may be necessary to comply with applicable laws. Video footage is typically kept for 30 to 60 days, and is automatically deleted if there is no cause. If necessary, targeted video footage of an event (such as an accident, incident or crime) can be archived for a longer period of time, and is generally retained until it is no longer needed in an insurance case, litigation or law enforcement application, including any related appeals or limitation periods.

If you are a resident of Canada, we prefer to store and process your personal information in Canada. However, this is not always possible. Our service providers may be located outside of Canada or they may store and process data outside of Canada. If this is the case, your personal information may be transferred to other countries. While we use contractual protections when we transfer personal information to other countries and take into consideration the protections afforded by the laws of the other country, we cannot guarantee that your personal information will receive equivalent protection when it is transferred. In certain circumstances, your personal information may be accessible under the laws of those other countries by foreign law enforcement, regulators or other authorities.

## 11. How do we protect your personal information?

We take the security of your personal information very seriously and are committed to protecting your privacy by using a combination of administrative, physical, and technical safeguards.

We use these measures to protect the confidentiality of personal information and to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, while taking into account, among other things, the sensitivity of the information and the purposes for which it is to be used.

Examples of how we can protect your personal information include:

- employee training and ongoing reminders on privacy and security;
- restricting access to personal information to employees who need it;
- technical measures (where possible), such as encrypted logins, strong passwords, multi-factor authentication, firewalls, and other technical security tools;
- physical measures, such as locked storage areas and restricted access to our offices and other locations where personal information is stored;
- the obligation for service providers who will process your personal information on our behalf to commit to protecting your personal information when entering into contracts with us.

These safeguards also apply when we delete your personal information. We monitor for potential privacy breaches and provide appropriate notice of any breach that may result in a real risk of significant harm to an individual or that may result in a risk to an individual's rights or freedoms. Where required by law, we will inform the persons concerned and the competent supervisory authorities without undue delay.

While we take care to protect your personal information, no security system can provide you with a guarantee of security. We believe that we have developed and maintained administrative, technical and physical safeguards designed to comply with applicable legal requirements and industry standards.

It is nevertheless possible that hackers, employees or service providers acting contrary to our policies and procedures, or others, may circumvent these safeguards to improperly access our systems or documents, or the systems or documents of our business partners, agents or service providers, and access, obtaining or misusing clients' digital assets and funds. The methods used to gain unauthorized access, disable or degrade services, or sabotage systems are constantly changing and evolving, and can be difficult to predict or detect for long periods of time.

The security of your information is also a shared responsibility. Please take the following steps to protect your personal information:

- Install the latest security updates and antivirus software on your device to help prevent malware and viruses.
- use the latest version of browsers;
- Change your account password frequently and not share it with others.
- Use strong passwords to lock your device and mobile apps.
- Never use the same password for multiple sites.
- Use two-factor or multi-factor authentication whenever possible.
- Learn how to spot phishing scams and be generally wary of unknown emails, phone calls and flyers.
- limit the amount of personal information you disclose on social media platforms.

## 12. Changes to this Privacy Policy

This Privacy Policy was last updated on the date indicated above, and is effective as of that date. We reserve the right, in our sole discretion, to modify or add to this policy from time to time. If we make a change to this Privacy Policy, we will post those changes on our website at

<https://serogrowth.com> and make the revised policy and changes available upon request to SERO Growth's Privacy Office.

Subject to applicable law, the changes are binding on you; they will be effective immediately after we post the revised Privacy Policy on our website. If you do not agree with the revised Privacy Policy, you may not use our services or products and you should not visit our websites and applications or our properties.

We will obtain necessary consents under applicable laws if we need to collect, use or disclose your personal information for purposes other than those for which your consent is obtained, unless required or permitted by law.

### 13. Contact us

SERO Growth has appointed a Chief Privacy Officer to oversee compliance with this Privacy Policy and applicable privacy laws.

You may contact our Privacy Office in writing to ask a question or make a complaint. You may also contact our Privacy Office to request access to or correction of your personal information, or to request deletion of data that we no longer believe needs to be retained. We may need to see identification to verify that you are who you say you are.

For more information about SERO Growth's privacy practices, please contact our Chief Privacy Officer at:

Privacy Officer Mr. David SOLOMON  
info@serogrowth.com