



## PRIVACY POLICY

This is the privacy policy of Coromandel Properties (which includes all companies, partnerships and limited partnerships that form part of the Coromandel Properties group) (collectively, “Coromandel”), and governs use of personal information by Coromandel, whether such information is collected via our websites, including <https://coromandelproperties.com> (“Website”) or otherwise, including through our services (the “Services”).

This Privacy Policy explains what Personal Information we obtain from you in your use of the Website and the Services and the steps we take to secure that Personal Information. Coromandel will not collect, use or disclose your Personal Information in a way that is incompatible with applicable federal or provincial legislation or this Privacy Policy. In this Privacy Policy, the terms “we”, “our” and “us” refer to Coromandel. In this Privacy Policy, the terms “you”, “user”, and “your” refer to a visitor of the Website or user of the Services. By submitting Personal Information to us or by otherwise using any of our Services or our Website, you hereby consent to the collection, use and disclosure of your Personal Information in accordance with this Privacy Policy.

If you do not agree with some or all of this Privacy Policy and are not of the age of majority in your province of residence, please do not use the Website or our Services.

We recommend that you take the time to read this Privacy Policy so that you understand how we handle Personal Information. This Privacy Policy may also change. We will include a “last revised” date on the Privacy Policy as displayed on the Website. We strongly encourage you to refer back to the Privacy Policy periodically.

### 1. HOW WE COLLECT AND USE PERSONAL INFORMATION

For the purposes of this Privacy Policy, the following terms will have the following meanings:

“Business Contact Information” means your business position, name or title, business address, business telephone number, business email address and business fax number. “Personal Information” means information about an identifiable individual, but does not include Business Contact Information or general, statistical or aggregated information. Personal Information includes a name, home address, date of birth, contact information (including personal telephone number and



personal e-mail address), employment status, and income. We will identify the purpose for collecting your Personal Information when we request such information. We collect Personal Information only as necessary to provide services to you and will not use or disclose your Personal Information other than for the purpose for which it was collected, without your prior consent. Without limitation, Coromandel may collect your Personal Information for the following purposes:

**Providing Services, Sharing Information and Surveys.** Your Personal Information may be collected and used by Coromandel to provide services to you via our Website or otherwise. Your Personal Information may be used by Coromandel so that we can share information about Coromandel, the Website, and our Services with you. We may use your Personal Information to communicate with you regarding your inquiries for information or other issues as they relate to your use of the Website and the Services, and based on your Personal Information, we may send you personalized promotions or offers. We may also invite you to participate in online customer surveys. If you choose to participate in such surveys, we may use the Personal Information that you may provide to contact you or to improve our Services.

**Project Information.** You may provide your Personal Information to us by completing a form in one of our properties. We will use the information requested on the sign-up forms only for the purpose of facilitating communication with you about the project and future Coromandel projects. We may also use the information to allow us to tailor our future projects to meet your interests.

**Service Analysis.** When you use our Website, a cookie may be placed within the memory of your internet access device. We may use permanent cookies or server-side artifacts to help us track use of our services by users, including casual visitors to the Website—such as (without limitation) the number and frequency of visits to our pages and which parts of our Website are visited. Similarly, we may also collect information regarding the type of device, your operating system, the browser you use, your internet service provider, your domain name, your internet protocol (IP) address, the date and time that you accessed our service, the website that referred you to our Website, the web pages you requested and the subject of the ads you click or scroll over, and use such information to evaluate Website performance and service quality. To collect this information, we use cookies, web beacons and similar technologies. We may also use your Personal Information to detect, prevent or investigate security breaches or fraud, to protect our business and to maintain appropriate records for internal administrative purposes.



We may also use your Personal Information for such other purposes as may be introduced to this Privacy Policy from time to time upon notice being given to you. For greater certainty, you hereby agree that sufficient notice includes making the Privacy Policy available on the Website. You may withdraw your consent to collect, use and disclose Personal Information by contacting us. You may further choose to unsubscribe from receiving emails from us at any time, but you may no longer be able to access our Services if you withdraw your consent.

## 2. OUR DISCLOSURE OF PERSONAL INFORMATION

Coromandel may disclose Personal Information if a law, regulation, search warrant, subpoena or court order legally requires or authorizes us to do so. We will use reasonable efforts to ensure that any third party to whom Personal Information is disclosed provide a comparable level of protection for your Personal Information, as provided in this Privacy Policy.

Additionally, Coromandel reserves the right to disclose and to transfer Personal Information to a third party in the event of a proposed or actual purchase, sale, merger, amalgamation, or any other type of acquisition, disposition, or financing of all or any portion of Coromandel or any of the assets or shares of Coromandel, provided that the third party represents that it will continue to use the information for the purposes set out in this Privacy Policy and in accordance with applicable privacy laws.

## 3. RETENTION OF PERSONAL INFORMATION

We routinely destroy Personal Information that is no longer required for the purposes described herein, in accordance with applicable laws.

## 4. ACCURACY OF PERSONAL INFORMATION

Coromandel uses reasonable and appropriate measures, including encryption software, designed to help you secure your Personal Information against accidental or unlawful loss, access or disclosure. Only staff and service providers who have a legitimate business purpose for accessing the Personal Information collected by us are authorized to do so. Unauthorized use of Personal Information by anyone affiliated with Coromandel is prohibited and constitutes grounds for disciplinary action.

You and you alone are responsible for ensuring that you do not disclose your account access information to third parties. This includes but is not limited to not



disclosing such information to anyone, ensuring that sufficient security software is installed and running on your computer, smartphone or tablet, that your network firewall is of sufficient quality and that your wireless connection is encrypted to a degree that will prevent third party access. Coromandel is not responsible for any failure by you to secure your own device and its access to the Internet or your use of public, unsecured networks. Coromandel also is not responsible for any failure by you to eliminate malware. These failures and others can make you vulnerable to privacy breaches and would put you and your data at risk.

## 5. LINKS TO THIRD PARTY SITES

The use of our services may lead you to third party websites. Those organizations are separate and distinct from Coromandel and have their own separate privacy policies. We are not responsible in any way for how any third party collects, uses or discloses your Personal Information, so it is important to familiarize yourself with the privacy policies of these websites before providing your Personal Information to them.

## 6. INDIVIDUAL ACCESS

Upon written request to Lynn Wu at [privacy@coromandelproperties.com](mailto:privacy@coromandelproperties.com), you will be informed of the existence, use and disclosure of your Personal Information, and will be given access to that Personal Information. Coromandel provides an opportunity for individuals to challenge the accuracy and completeness of their Personal Information and have it amended as appropriate.

## 7. CONTACTING US

Accountability with respect to your Personal Information is important to Coromandel. In the event that you have any questions (including how Personal Information is managed by Coromandel), complaints or concerns about this Privacy Policy, or if you have reason to believe that we may have failed to adhere to it, please contact us by sending an email. Questions regarding your rights and our responsibilities under this Privacy Policy can be directed to Lynn Wu at [privacy@coromandelproperties.com](mailto:privacy@coromandelproperties.com).