Royal LePage® Benchmark, Brokerage Privacy Policy

At Royal LePage® Benchmark, Brokerage ("Benchmark"), we respect the privacy of our clients and we are committed to keeping your personal information accurate, confidential, secure, and private. We have adopted the following ***Privacy Policy*** to ensure that Benchmark continues to meet its commitment to your privacy.

The following sections, read as a whole, constitute the Benchmark Privacy Policy:

Introduction

Benchmark provides a variety of products and services to the public, including, but not limited to, real estate brokerage services, real estate agency services, advising with respect to real estate purchase and sale, home leasing, property management, and other real estate advisory services.

In the course of providing these products and services, Benchmark may collect certain personal information about its clients with their consent.

"Personal Information" means information about an identifiable individual. This may include, without limitation, the individual's name, home address, age, income, credit history, or other financial information, credit card information, personal preferences, and other information about his or her family. Personal Information does not include the name, title, business address, or telephone number of an employee of an organization.

The Benchmark Privacy Policy is based on, and complies with, *Canada's Personal Information Protection and Electronic Documents Act* ("PIPEDA") For more information about this legislation, please visit the official Web site of the Privacy Commission of Canada at https://www.priv.gc.ca/.

This Privacy Policy describes the principles that Benchmark follows to ensure that we protect your Personal Information when we collect, use, or disclose it in the course of carrying on commercial activities. All of our employees who have access to Personal Information must adhere to the Benchmark Privacy Policy and related procedures. To this end, Benchmark has appointed a privacy officer to ensure compliance by all Benchmark employees and to address your privacy concerns.

The principles of privacy

The following principles govern our actions as they relate to the use of Personal Information:

1. Accountability
2. Identifying purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure, and retention

6. Accuracy
7. Safeguarding personal information
8. Openness

Principle 1: Accountability

Benchmark is accountable for all Personal Information in its possession or custody, including Personal Information disclosed to third parties for purposes of providing services requested by you.

Principle 2: Identifying purposes

Benchmark will inform you of the purposes for which it is collecting any Personal Information, before or at the time the information is collected.

Principle 3: Consent

Benchmark will obtain your consent before or when it collects, uses, or discloses your Personal Information.

- Consent can be express, implied, or given through an authorized representative. You may withdraw your consent at any time (subject to any legal consequences of which you will be informed). Benchmark, however, may collect, use, or disclose Personal Information without your knowledge or consent in exceptional circumstances where such collection, use, or disclosure is permitted or required by law.

Principle 4: Limiting collection

The information collected by Benchmark will be limited to those details necessary for the purposes it has identified to you or to perform the services you have requested. Information will be collected by fair and lawful means.

Principle 5: Limiting use, disclosure, and retention

Personal Information will only be used or disclosed for the purpose for which it was collected unless you have otherwise consented. Personal Information may only be retained for the amount of time needed to fulfill the purpose for which it was collected.

In certain exceptional circumstances, Benchmark may have a legal duty or right to disclose Personal Information without your knowledge or consent with respect to matters that concern the brokerage's or the public's interest.

Principle 6: Accuracy

Benchmark will keep Personal Information as accurate, complete, and current as necessary to fulfill the identified purposes for which it was collected. You may have this information amended where it is found to be inaccurate or incomplete.

Principle 7: Safeguarding personal information

Personal Information is safeguarded using measures appropriate to the sensitivity of the information.

Principle 8: Openness

Benchmark will make information available to its clients, employees, and Benchmark brokers about the policies and procedures Benchmark uses to manage Personal Information. You have access to this information through our website, or through alternative means if requested.

The kind of information we collect

Benchmark gathers and uses Personal Information in order to provide you with the products and services you have requested, namely: information that is required to effectively market and sell

the property of sellers or lessors; to locate, assess, and qualify properties for buyers; to evaluate independent broker applicants; and to otherwise provide professional and competent real estate services to clients as well as to ensure that you are satisfied with the products and services we have provided. Benchmark may also use your Personal Information to update you about our services and to offer you additional products or services that you may be interested in, so that we may continue to serve your real estate needs.

We may be required to collect your social insurance number if the federal government obligates us to do so pursuant to the *Income Tax Act.*

If you visit Benchmark websites, we do not collect Personal Information about you unless you provide it. All information that you do provide us with is securely maintained and kept strictly confidential. This Privacy Policy does not apply to aggregated data from which it is not possible to determine the identity of a specific individual. Benchmark reserves the right to use aggregated data in any way that it determines appropriate.

When you use the “Ask about this listing” feature on the Benchmark Website to request more information about a property from an agent, you agree to provide Benchmark and the agent receiving the request with your browser history (recently performed searches on royallepage.ca, recently viewed listings) along with any searches or listings saved to your account where an account has been set up by you on the Benchmark Website.

How we use your information

At Benchmark we use Personal Information for three general purposes:

- To communicate with you in order to provide you with our products and services.
- For inclusion in documentation relating to your particular real estate transaction.
- Transactional information to monitor our level of service and report back to you to ensure your satisfaction with the provision of such services.

We will only use Personal Information for the purpose that we have disclosed to you. If we want to use your information for a different purpose, we will notify you and ask for your consent first.

When we are permitted to disclose your information

Benchmark is obliged to keep your Personal Information confidential except under the following circumstances:

1. When authorized by you: Many of the services offered by Benchmark require us to obtain Personal Information about you in order to perform the services you have engaged us to provide. We will always obtain consent from you first, and we will never use the information for purposes other than those we have told you about.
2. You may withdraw your consent at any time, subject to any legal implications (which we will inform you about). In some cases, if you do not consent to our use or disclosure of certain Personal Information, we may be unable to continue to provide all or part of the services you have requested.
3. When required by law: The type of information we are legally required to disclose usually relates to government tax reporting requirements. In some cases, however, such as under

a court order, we may be required to disclose certain information to persons specified in the court order. We will only provide the specific information requested and only upon being satisfied that the authorities have legitimate grounds to request the information.

4. When permitted by law: The legislation has provided certain situations where Benchmark is legally permitted to disclose Personal Information without your consent. Examples include situations involving the collection of debt in arrears, medical emergencies, or suspicion of illegal activities.

With whom we may share your information

1. Benchmark employees: In the course of daily operations, access to sensitive Personal Information is limited to those employees with a legitimate reason for accessing it. As a condition of their employment, Benchmark employees are required to follow all applicable laws and regulations, including this Privacy Policy. Unauthorized use or disclosure of confidential client information by any Benchmark employee is prohibited and may result in disciplinary measures.
2. Benchmark affiliates: In order to better meet your needs, we may share some of your Personal Information with our affiliates. We will only do this with your express consent and you may withdraw this consent at any time. The procedure for withdrawing consent is outlined below under the section “Opting Out.”
3. Benchmark third-party suppliers: As you may know, we may engage and coordinate third-party suppliers to provide you with certain services offered through Benchmark. Such suppliers are only given the information that is needed to provide the specific service for which we contract them to provide. Suppliers are obliged to protect the confidentiality of your Personal Information and are prohibited from doing anything with this information that we have not authorized them to do. They are required to treat your Personal Information in a manner consistent with the Benchmark Privacy Policy.
   - If you access Benchmark websites from third-party websites, including any partner or referral sites, you authorize Benchmark to collect and use any Personal Information about you that you provide to us while visiting Benchmark websites and to share with the third-party any Personal Information collected. You also authorize any such third-party to use any Personal Information or any content you may provide while using Benchmark websites for preparing, using and distributing statistical, profiling, performance or operation reports.
4. Sale of business: We may transfer your personally identifiable information to a third party in connection with a sale, merger, or other disposition (whether of assets, stock, or otherwise) of our business.

How we safeguard information

Benchmark has extensive controls in place to maintain the security of its information and information systems. Client and independent broker files are stored according to the sensitivity of the information contained therein. Appropriate controls (such as restricted access) are placed on our computer systems and data processing procedures. Physical access to areas where Personal Information is gathered, processed, or stored is limited to authorized employees.

When you telephone a Benchmark employee to speak about your file, you may be asked for some personally identifying information. This type of safeguard is designed to ensure that only you, or someone authorized by you, has access to your file.

Website security

In order to serve you better, Benchmark offers clients access to certain information through its websites. RoyalLePageBenchmark.ca provides general information about Benchmark and the products and services it offers.

The Benchmark Web site contains links to other Websites, including those of its business partners. Benchmark is in no way responsible and cannot guarantee the content or privacy of other sites linked to RoyalLePageBenchmark.ca.

Accessing and amending your information

As a client of Benchmark you have the right to access the Personal Information we keep in your file and you have the right to verify or amend the information if it is shown to be inaccurate. If you would like to view the Personal Information held in your file, please make a written request to the Privacy Officer at the address listed below, under “Questions, Concerns, and Complaints”. We will respond to your request as efficiently as possible.

To make a change, please make a similar request in writing to the Privacy Officer.

Opting out

In order to provide you with our services and products, Benchmark will, with your consent, share your personal information with other Benchmark affiliates. Should you not want to receive promotional materials from or have your Personal Information shared with these companies please contact the Privacy Officer at the address, phone number, or email address provided at the end of this document.

Anonymous information and “cookies”

Benchmark may collect anonymous information about you. This means that the information collected cannot be traced back to a specific person. For example, our Web servers may record certain information automatically when you visit a Benchmark website. This information is collected using “cookies” and might include the pages you visited, your IP (Internet protocol) address and other site usage statistics. This anonymous information is used for research and analytical purposes only (like evaluating how many visitors our websites receive or which pages they visit most often). It does not reveal any Personal Information about you, the user. This aggregate data may be disclosed to third parties, but never with personally identifying information.

“Cookies” are small text files that contain a unique identification number that allows our computers to identify your Web browser (but not you) each time you visit one of our websites that uses cookies. The information helps Benchmark improve the functionality of the site and

enhance the navigation and security of your session. Most major websites use this technology and most browsers are set up to accept them.

You may configure your browser to notify you when you receive a cookie, and you may refuse to accept them entirely. However, if you refuse to accept cookies, you may limit the functionality that we can provide to you when you visit our site.

Questions, concerns, and complaints

If you have any questions, concerns, or complaints about your Personal Information, or about the Benchmark Privacy Policy, contact our privacy officer using the contact information provided below:

Corinne Lyall, Privacy Officer
Royal LePage® Benchmark, Brokerage
110 – 7220 Fisher Street SE, Calgary, AB T2H 2H8

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June 2024