

## **Privacy Policy of Williams & McDaniel Property Management**

Privacy of personal information is an important principle to Williams & McDaniel Property Management. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the premises and services we provide. We also try to be open and transparent as to how we handle personal information. This document describes our privacy policies.

### **What is Personal Information?**

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, family status), their health (e.g., disabilities) or their activities and views (e.g., religion, politics, opinions expressed by an individual, opinions about an individual). Personal information is to be contrasted with business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

### **Who We Are**

Our organization, Williams & McDaniel Property Management, provides residential units for lease. We use a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These include building managers, security, cleaning and maintenance organizations, bookkeepers and accountants, computer consultants, temporary workers to cover holidays, cleaners, and lawyers. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

### **We Collect Personal Information: Primary Purposes**

#### *About Tenants*

Like all landlords, we collect, use and disclose personal information in order to serve our tenants and operate our property. For our tenants, the primary purpose for collecting personal information is to ensure their safety, security and reasonable enjoyment and that of our other tenants, to ensure they have access to the premises and services that we have agreed to provide, to preserve our property and to collect rents and other fees. Examples of the type of information we collect for these purposes include the following:

- Names of all occupants of the unit
- Business and emergency contact information
- Payment, banking and other financial information
- Any special needs of tenants (e.g., disability or health) and
- Social insurance number

As a service and convenience for tenants we may maintain public directories of tenants (e.g., by the front door). If you do not wish to be listed in any directories or wish to be described in a particular way, please let us know.

It would be rare for us to collect any personal information without the tenant's express consent, but this might occur in a case of urgency (e.g., the tenant is unavailable), where we believe the tenant would consent if asked and it is impractical to obtain consent (e.g., information provided by a relative about an absent tenant), appropriate public sources (e.g., government, court or tribunal records) or to investigate a breach of the tenancy agreement or contravention of the law.

The information described above and the information set out below about prospective tenants can be collected or updated if the tenant is in arrears of rent or fees or wishes to renew a tenancy agreement.

In addition, we may share our tenant lists with any provider of utilities, services and/or commodities to the building (including, without limitation, gas, electricity, water, telephone, cable and satellite) for the purpose of marketing, promoting, tailoring products for our residents and providing such utilities, services and/or commodities to the building.

#### *About Prospective Tenants*

Prospective tenants are requested to complete a rental application form so that we can assess their suitability as tenants and have necessary basic information should they become tenants. This would include the following types of information:

- Past tenancy history
- Employment history
- References and conduct history
- Financial means and credit history
- Automobile information

We will then confirm this information and check references and the conduct history of the prospective tenants. This might include following up with other individuals identified during the course of these inquiries as having relevant information (e.g., a person identified by a reference you provided to us). We may also contact a credit agency and/or a consumer reporting service for information about your suitability. We might also check appropriate public sources (e.g., government, court or tribunal records). By completing a rental application form you agree to our collecting this information about your suitability to be a tenant.

#### *About Members of the General Public*

For members of the general public, our primary purpose for collecting personal information is to promote the safety of our tenants and the security of our property. For example we may operate security cameras and monitor the presence, vehicles and conduct of visitors and non-tenants on our property. We

believe that the collection of this information is implied by the private and residential nature of our property.

Secondly we might gather personal information in the course of marketing our property to prospective tenants. This information is collected either from appropriate public sources (e.g., telephone directories) or directly from the individuals with their consent.

On our website, we only collect, with the exception of cookies (electronic markers identifying computers that have previously visited our website), the personal information you provide and only use that information for the purpose you gave it to us (e.g., to respond to your email message, to provide information about our property and services). Cookies are only used to help you navigate our website and are not used to monitor you.

#### *Suppliers and Contractors*

We often deal with suppliers and contractors who provide goods and services to the properties we own. We monitor their performance, including their promptness, reliability, quality and value of services. Most of this information is business information and would not be covered by privacy legislation. However, occasionally, this information relates to the conduct of an individual (e.g., skill of a particular employee of a supplier or contractor, inappropriate behaviour or comments by a particular representative). We reserve the right to collect this information, use it in deciding upon future services and to disclose it to our property manager or others involved in related or similar operations. We may also collect home contact information to reach them in case of emergencies.

#### *About Contract Staff*

For people who are contracted to do work for us (e.g., temporary workers), our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g., for new assignments) and for necessary work-related communication (e.g., sending out paycheques, year-end tax receipts, tax filings). Examples of the type of personal information we collect for those purposes include home addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of an emergency (e.g., an outbreak of a contagious disease) or to investigate a possible breach of law (e.g., if a theft were to occur).

### **We Collect Personal Information: Related and Secondary Purposes**

Like most landlords, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- To collect rents and other fees.

- We review tenant and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our consultants, suppliers and staff. In addition, external consultants (e.g., auditors, lawyers, business consultants) may on our behalf do audits and continuing quality improvement reviews of our operations, including reviewing tenant files and interviewing our staff.
- Various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. Also, we believe that we should report information suggesting serious illegal behaviour to the authorities. These reports could include personal information about a tenant, or other individual, to support the concern (e.g., illegal drug activity), although we try to keep this disclosure to a minimum. In these circumstances, we may consult with professionals (e.g., lawyers, a private security service) who will investigate the matter and report back to us.
- If your rent or fees are paid for by a third party (e.g., your employer, your trustee, the government) we may be asked to provide them with certain information. These third party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate tenant entitlement to and responsible use of this funding.
- Tenants or other individuals we deal with may have questions about the services they received. We also provide ongoing services for many of our tenants over a period of months or years for which previous records are helpful. We retain our tenant information for a minimum of seven years after the last contact to enable us to respond to those questions and provide these services.
- If Williams & McDaniel Property Management or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the organization’s records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization’s business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

You can choose not to be part of some of these related or secondary purposes (e.g., by not having a third party pay your rent). We do not, however, have much choice about some of these related or secondary purposes (e.g., external regulation).

### **Protecting Personal Information**

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All of our cell phones are digital, which signals are more difficult to intercept (however, we still are careful on cell phones because sometimes they switch over to an analog service).
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or is anonymized or encrypted.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- External consultants and agencies with access to personal information must provide us with appropriate privacy assurances.

### **Retention and Destruction of Personal Information**

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We keep our tenant files for about seven years. Our tenant and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed or completely reformatted.

### **You Can Look at Your Information**

With some exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests.

If there is a problem, we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If you believe there is a mistake in the information, you have the right to ask for it to be corrected. We may ask you to provide documentation that our files are wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you

on the point and we will forward that statement to anyone else who received the earlier information.

**Do You Have a Question?**

Our Information Officer, Zeljka Budjinski, can be reached at:

301 – 66 Macdonell Street | Guelph, ON | N1H 2Z6  
PHONE (519) 836-9721

She will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. She will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

This policy is made under the *Personal Information Protection and Electronic Documents Act*. It is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

112 Kent Street  
Ottawa, ON K1A 1H3

Phone: (613) 995-8210  
Toll-free: 1-800-282-1376  
Fax: (613) 947-6850  
TTY: (613) 992-9190  
[www.privcom.gc.ca](http://www.privcom.gc.ca)

I have read and understood this privacy policy:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Print Name: \_\_\_\_\_

Witness: \_\_\_\_\_