

This Policy sets out the measures and practices that BLVD IMMOBILIER (the "Agency" or "we" or "us") has put in place to govern its governance of personal information and to protect the personal information of its clients, i.e. individuals from whom the Agency collects personal information through direct or indirect contact with an authorized representative of the Agency and the <https://blvdimmobilier.com/> the "Website") ("Customers" or "you" or "your"), for the purposes described in section 4 below.

In this Policy, "personal data" means any information collected by the Agency which, alone or in combination with other information, directly or indirectly identifies a Customer.

The main purpose of this Policy is to inform Customers:

- the means used by the Agency to collect personal information;
- the nature of the personal information collected by the Agency and the purposes for which it is collected;
- the manner in which the Agency may use personal information and the third parties to whom the Agency may, where applicable, disclose personal information;
- the rights you have with respect to personal information collected by the Agency, including the right to access your personal information or to request rectification.

By submitting one or more pieces of personal information to the Agency through direct or indirect contact with an authorized representative of the Agency or through your use of the Website, you consent to the collection, use, disclosure and retention of such personal information by the Agency in accordance with the terms, conditions and notices set forth in this Policy.

The Agency reserves the right to change the terms, conditions and notices contained in this Policy at any time and at its sole discretion. In such event, the Agency will provide you with a version of this Policy incorporating such modifications. Your use of the Services (as defined in Section 4 below) after receipt of such version will be deemed to constitute your express acceptance of the modifications made.

This Policy and any modified version thereof are subject to the laws applicable in the Province of Quebec.

1. How does the Agency collect personal information?

The Agency collects personal information in a number of ways: (i) when you voluntarily provide such personal information to an employee or authorized representative of the Agency in writing, by e-mail or verbally, (ii) information we collect from other companies and public bodies, (iii) when you use the website.

Personal information communicated when using the website may be communicated directly (e.g. via a web form or e-mail) or automatically (see the list of automatically collected personal information in section 3).

2. What personal information does the Agency collect?

The personal information that the Agency may collect is as follows:

- Your last name, first name and contact information (postal address, e-mail address, telephone number);
- Your date of birth, gender and language preference;
- Personal information enabling the Agency, through its authorized representatives, to verify your identity and that of any other person in compliance with applicable real estate brokerage legislation, including the Real Estate Brokerage Act (RLRQ, c. C-73. 2) and the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (S.C. 2000, c. 17), as well as their respective regulations, i.e., among others, the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (S.C. 2000, c. 17):
- Your profession or principal occupation,
- Authentic, valid and up-to-date government-issued photo identification,
- A reliable source document showing your name and address, a reliable source document showing your name and date of birth, and a document showing your name and confirming that you hold a deposit account, prepaid payment product account, credit card or other loan account with a financial entity;
- Your Canadian citizenship or residency;
- Personal information that you provide to us in connection with the performance of the Services (as defined in section 4 below) and which may constitute sensitive personal information, such as:
 - Information concerning your real estate transaction project; and financial information required for credit investigations and down payments (credit card number, mortgage approval, tax statements, credit investigation report, etc.).
 - Financial information required to conduct credit investigations and collect deposits and payments (credit card number, mortgage approval, tax statements, credit investigation report, etc;)
 - Your exchanges and communication history with us (call recordings, chat sessions and instant messaging conversations, including via our social media);
 - Personal information generated by you in the course of your use of the services (complaints, inquiries, notices, comments and survey responses);
 - Personal information provided in connection with an application for employment or engagement with the Agency (curriculum vitae, information on education, professional experience and professional affiliations);
 - Personal information that you are required or invited to provide to the Agency due to the nature of your relationship with the Agency (for example, if you are a director or employee of the Agency: social insurance number for employees and financial information for employees, photographs of employees for publication on the website and identification documents for each of the Agency's directors in application of the law aimed primarily at improving corporate transparency) ;
 - Personal information collected automatically when you use the website (see section 3).

3. Personal information collected automatically or by cookies

In order to ensure the functionality of the website and the purpose of the personal information below, the Agency must collect the following personal information from customers who visit the website:

- The domain name of their Internet service provider;
- Their IP address;
- Their browser (Explorer, Firefox, etc.) and operating system (Windows, Mac OS, etc.);
- The date and time of their visit;
- Country of origin;
- Pages consulted and time spent;
- referrer site address; and
- collision data.

All this information is collected automatically as soon as a customer logs on to the website. Some of this personal information is collected via temporary cookies or web beacons. These files or tags also enable us to improve the Site's performance and certain of its functionalities.

4. For what purposes does the Agency collect personal information?

The Agency collects your personal data for the following purposes:

- To provide guidance, information, advice and tools in connection with the real estate transactions you request us to carry out (collectively: the "Services") ;
- To carry out real estate transactions and receive remuneration for our Services;
- Comply with applicable laws and regulations;
- In connection with the use of the Services, issue notifications and alerts to provide you with specific information. To this end, the Agency uses profiling technology, the functions of which must be activated by the Customer from the Website;
- In general, to communicate with you in order to provide you with various information relating to the Services and to offer you products and/or services that may be of interest to you;
- Periodically follow up with you to ensure that you are satisfied with the Services;
- Develop, improve and promote the Services, in particular by generating and publishing de-identified statistical data based on the personal information of several customers;
- Evaluate the effectiveness of the Agency's efforts to attract visitors to the website;
- Evaluate which of the Agency's information offerings and approaches attract the interest of visitors to its website;
- Identify the approaches of our partner sites that have been successful in attracting visitors;
- Improve website performance and retention;
- Identify the legislative regime to which visitors' personal information is subject; and
- Where applicable, to consider your application for employment or engagement with the Agency.

- Subject to the exceptions provided by applicable legislation, the Agency will ensure that it obtains your consent before proceeding with any use of your personal information for purposes other than those listed above.

5. To whom may the Agency disclose your personal information?

In general, the Agency uses its customers' personal information for internal purposes only. However, the Agency may disclose your personal information to the following persons or entities:

To its employees and representatives who need access to this personal information for the purposes listed in section 4 above;

To external service providers with whom the Agency has entered into a contractual agreement under which the relevant external service provider is required to take appropriate measures to:

Protect the confidentiality of personal information provided;

Ensure that the personal data communicated is used only for the purposes of performing the services it is called upon to render to the Agency;

Ensure that the personal information communicated is not retained after termination of the aforementioned contractual agreement;

Notify the Agency without delay of any breach or attempted breach by any person of any obligation relating to the confidentiality of the personal information communicated; and

Allow the Agency to verify the confidentiality of the personal information provided. For example, the service provider who hosts and maintains the website may have access to personal information in connection with the specific performance of its services under a contractual agreement with the Agency;

To any other person or entity, where required or permitted by applicable law, or with the consent of the relevant customer.

In order to carry out the above-mentioned purposes, the Agency may disclose your personal information outside Quebec. However, the Agency will only do so if a privacy impact assessment demonstrates that the receiving party is able to provide adequate protection for such personal information, including generally accepted privacy principles. In such circumstances, the Agency will contractually require the entity receiving your personal information to comply with various conditions ensuring the protection of your personal information, including, but not limited to, all of the conditions set forth in Section 5(b) above.

6. How does the Agency protect the confidentiality of your personal information?

The Agency takes appropriate physical, technological and administrative safeguards to protect your personal information and reduce the risk of unauthorized and/or unlawful access, use, disclosure and destruction.

Without limiting the generality of the foregoing, the Agency:

- Verifies the identity and criminal record of all its employees and representatives;
- Requires all employees and representatives with access to personal information to sign a confidentiality agreement;
- Has access controls limiting access to personal information to authorized employees and representatives who need access to personal information;
- Keeps personal information on recorded media in locked premises accessible only by authorized Agency employees and representatives; and
- Keeps personal information on a secure technological medium, namely the information system provided by electronic document management providers, on which an identification and authentication system is notably implemented in order to limit access to your personal information to authorized persons who require such access in pursuit of one or more of the purposes listed in section 4 above.

In addition, the Web Site has certain security mechanisms designed to protect your personal information:

- All exchanges between BLVD IMMOBILIER servers and users' devices are encrypted;
- All user passwords are encrypted;
- The Agency's IT service provider is subject to various security obligations, including periodic validation of security practices and processes and ongoing monitoring of Web site software components and their updates.

7. What measures has the Agency put in place to deal with confidentiality incidents?

The Agency keeps a register of confidentiality incidents in accordance with applicable legislation. In the event of a confidentiality incident presenting a risk of serious harm to you, the Agency will take the necessary steps to inform you, in accordance with the applicable legislation. The assessment of the risk of serious harm to you is made taking into account criteria such as the sensitivity of the personal information concerned by the confidentiality incident, the apprehended consequences of its use and the likelihood that it will be used for harmful purposes.

8. How long do you keep your personal information?

In accordance with our procedures for the secure retention and destruction of personal information, we retain your personal information only for as long as is necessary to fulfill the purposes listed in section 4 of this policy or for as long as is required to comply with our legal obligations, whichever is later.

The Agency reserves the right to close a Customer's file once the entire real estate transaction process has been completed or, in the case of Agency employees, for a consecutive period of at least seven (7) years from the date of termination of employment, subject to a statutory obligation providing for a different

minimum retention period. The closure of a file implies the complete and definitive destruction of the personal information it contains, or its anonymization with a view to its use for serious and legitimate purposes. In the case of the closure of a file concerning a Customer who is not an employee or representative of the Agency, the personal information contained therein will be destroyed or rendered anonymous usually after the expiry of a period of six (6) years following the date of closure of the said file, due to the retention periods imposed by law.

In this policy, the term "anonymization" refers to the process by which personal information can no longer be irreversibly identified, directly or indirectly, with a specific individual.

9. How can you access, rectify, update and/or obtain a copy of your personal information?

The Agency recognizes the right of its customers to access, rectify, update and obtain a copy of their personal information by submitting a written request to this effect to the Agency, at the coordinates indicated in section 13 below. In the event that such a written request is forwarded to the Agency, the latter must, in accordance with the Law, verify your identity and ensure that it responds to you in writing no later than thirty (30) days after receipt of said request. Any request not processed within this period will be considered refused.

A request for rectification of personal information will be granted in certain circumstances, notably in the following cases:

Personal information is inaccurate;

Personal information is out of date;

Personal information is ambiguous;

Personal information is incomplete; or

Personal information has been collected unjustifiably.

If the Agency grants a customer's request for a copy of computerized Personal Information, it will provide the customer (or any person or organization authorized by law to collect such Personal Information, at the customer's request) with such copy in a structured, commonly used technological format. This paragraph does not apply (i) if the provision of such copy in such technological format raises serious practical difficulties and/or (ii) in respect of any computerized personal information that has been created or derived from any other personal information.

In the event that the Agency refuses to grant a customer's request for access, rectification or updating, the Agency will ensure that the customer is informed of the reasons for such refusal, as well as the remedies available to him or her in the matter and the time limit within which such remedies may be exercised. At the customer's request, the Agency will also help the customer to understand the reasons for the refusal.

In the event of a written request to this effect from a Customer, the Agency may also cease to disseminate any personal information concerning that Customer and/or de-index or re-index, as the case may be, any

hypertext link attached to that Customer's name, subject to the criteria established by applicable legislation.

10. How do you withdraw your consent to the use or disclosure of your personal information?

Subject to your contractual obligations with the Agency and applicable law, you may withdraw or change your consent to the use or disclosure of your personal information. To do so, you must send a written request to this effect to the Agency, using the contact information indicated in section 13 below.

Please note that withdrawing or changing your consent may affect the Agency's ability to adequately pursue the purposes of collecting your personal information as described in Section 4 of this Policy, and may therefore affect the services we provide to you.

11. How do I make a complaint?

You may make a complaint about our privacy policies, practices and procedures by writing to our Privacy Officer, whose contact details are set out in section 14 of this Policy.

All complaints will be handled directly by our Privacy Officer. A response will be provided within 30 days of the complaint. If the complaint is accepted, a brief summary of the changes made to the subject of the complaint will be provided.

If you are not satisfied with the handling of your complaint, you may also contact the Commission d'accès à l'information du Québec. To file a written complaint with the Commission, visit <https://www.cai.gouv.qc.ca/diffusion-de-linformation/services-et-formulaires/>

12. The Agency has no responsibility or liability for Third-Party Products.

The Web site may contain links to other Web sites or to third-party products and services (collectively, "Third-Party Products"). Third-Party Products may be subject to terms of use and privacy policies that differ from those of the Agency. The Agency is not responsible for the content of the terms of use and/or privacy policies of such Third Party Products. Without limiting the generality of the foregoing, the Agency has no responsibility for third-party products.

Any link available on the Website to a Third-Party Product does not imply or signify that the Agency assumes or accepts any responsibility for the content or use of such Third-Party Product. The Agency makes no representations regarding the quality, safety, suitability or reliability of Third Party Products or the content or materials contained therein. When accessing or using Third-Party Products, you should consult their terms of use and privacy policy.

13. How can you contact the Agency's Privacy Officer?

We are responsible for your personal information. Accordingly, we have designated an individual to act as our Privacy Officer. To exercise your rights, ask questions, make comments or lodge a complaint about this policy or our handling of your personal information, please contact this person using the contact details below.

Please note that the Agency is required to verify your identity before acting on any request, question, comment or complaint addressed to its Privacy Officer:

PRIVACY OFFICER

Contact BLVD IMMOBILIER :

Matthew Kattas (Owner)

Telephone: 514-944-2583

Email: blvdimmobilier@outlook.com