

PRIVACY POLICY

Introduction

This Privacy Policy (the "Policy") describes the practices of **Shops at Univercity** in relation to the collection, use, disclosure and protection of Personal Information (as defined below). At SHOPS AT UNIVERCITY, we are committed to protecting your privacy through practices that limit the collection, use, disclosure, disposition and destruction of Personal Information to what is necessary for the effective operation of our business. This Policy was created to inform you of our commitment to protecting your Personal Information and is based on the general principles in Schedule 1 of the federal Personal Information Protection and Electronic Documents Act. This Policy also includes information regarding SHOPS AT UNIVERCITY's compliance with Canada's Anti-Spam Legislation (CASL).

Definition of Personal Information

Personal Information includes any factual or subjective information about an identifiable individual. Some examples of Personal Information which SHOPS AT UNIVERCITY may collect from you are:

- Name
- Gender
- Age
- Address
- Phone number
- Email address

Purpose for the collection and use of your Personal Information

SHOPS AT UNIVERCITY collects Personal Information from individuals inquiring about our services. SHOPS AT UNIVERCITY uses the Personal Information in connection with the services requested and/or provided.

Consenting to our collection, use and disclosure of your Personal Information

The collection, use or disclosure of your Personal Information by SHOPS AT UNIVERCITY requires your knowledge and consent. At certain times, your consent for the collection, use and disclosure of your Personal Information may be implied from the manner in which it is collected. For example, when you provide us with your Personal Information in connection with a request for services, you have implicitly consented to SHOPS AT UNIVERCITY collecting, utilizing and disclosing your Personal Information in a manner necessary to provide services. Your consent may also be expressly provided by you. If SHOPS AT UNIVERCITY collects, uses or discloses Personal Information for purposes other than those described above, prior to the collection, use and/or disclosure of such Personal Information, unless required to be disclosed by law, you will be informed of, and your consent obtained prior to, SHOPS AT UNIVERCITY's collection, use and/or disclosure of that Personal Information. If we intend to use and/or disclose Personal Information that we previously collected for a new purpose which is not authorized under applicable laws, your consent will always be obtained before we use and/or disclose it for that new purpose.

You may always choose not to supply SHOPS AT UNIVERCITY with your Personal Information. Furthermore, previously granted consent may be withdrawn at any time by notifying the Chief Privacy Officer in writing.

Collection, Use and Disclosure of Personal Information Without Consent

There are certain circumstances where we may, or may be required to, collect, use or disclose your Personal Information without your knowledge or consent. Those circumstances include: if the disclosure is required by law, provided to our lawyers, for the purpose of collecting a debt you owe to us, in compliance with a subpoena, warrant, or issued order made by a court, person or body with jurisdiction to compel the production of information, or to comply with rules of court relating to the production of records.

Disclosure may also be made to a government institution or investigative body that has made a request for the information, identified its lawful authority to obtain the information and indicated that: it suspects that the information relates to national security, the defence of Canada or the conduct of international affairs, the disclosure is requested for the purpose of carrying out any investigation relating to the enforcement, gathering intelligence for the purpose of enforcing, or enforcing any law of any jurisdiction, or the disclosure is requested for the purpose of administering any law of Canada or a province. Disclosure may be made to an investigative body if the disclosure is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province.

Various government agencies (e.g., Canada 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, upon our initiative, we may also disclose Personal Information without your knowledge or consent if the information is used for the purpose of acting in respect of an emergency that threatens the life, health, or security of an individual, or has been collected under circumstances in which consent is not required. If information regarding an identifiable individual is disclosed to a person who needs the information because of an emergency that threatens the life, health or security of an individual and, if the individual whom the information is about is alive, we will inform that individual in writing of the disclosure without delay.

Amount of Personal Information collected by SHOPS AT UNIVERCITY

The amount of Personal Information collected by SHOPS AT UNIVERCITY shall be limited to what is necessary for the identified purpose of that collection.

Retention of your Personal Information

SHOPS AT UNIVERCITY will retain your Personal Information for as long as it is necessary to fulfill the purpose for which it was collected and to comply with applicable laws. After the Personal Information is no longer necessary either for the purpose for which it was collected or to comply with any laws it will be destroyed, erased, or made anonymous.

Protection of your Personal Information

SHOPS AT UNIVERCITY will protect your Personal Information in a manner that is consistent with and appropriate to the sensitivity of that Personal Information. Our handling of your Personal Information will respect its confidential nature at all times from the time of its collection until its ultimate disposal or destruction.

A complete list of persons or business entities to whom your personal information may be provided and who may, in turn, send Commercial Electronic Messages (CEMs) to you is attached as a schedule to this privacy policy under the heading: "Third Party Disclosure". At this time, we have taken steps to generally prohibit third parties from using your personal information for the purpose of sending you CEMs unless same are exempt from restrictions of, or are otherwise sent in full compliance with, Canada's Anti-Spam Legislation (CASL).

SHOPS AT UNIVERCITY undertakes to use reasonable efforts to maintain the accuracy, completeness and currency of your Personal Information that is held by SHOPS AT UNIVERCITY as is necessary to fulfill the purpose for which it was collected and is to be used. We may from time to time ask you to confirm the accuracy of your Personal Information for such purpose.

Use of Audio and/or Video Recordings

There are circumstances under which SHOPS AT UNIVERCITY may make audio and/or video recordings of your employees, contractors, or clients. There are several purposes for making the recordings; they include: situations where there are work-related performance issues in respect of SHOPS AT UNIVERCITY's role as consultant, to ensure the safety of the workplace, to ensure productivity, and to prevent harassment.

Audio and/or video recordings may be made during meetings, interviews, or telephone calls between the SHOPS AT UNIVERCITY and its clients. Audio and/or video equipment may be operating at other times. Information recorded by the audio and/or video equipment may capture communications of any of the following persons: the client, employees, contractors, and the general public.

Accessing your Personal Information

Access to your Personal Information held by SHOPS AT UNIVERCITY may be requested by contacting the Chief Privacy Officer in writing. Requests must be in writing and sufficiently detailed so that we may respond appropriately to the requests. Verification of your identity will be required. When providing information, we will edit certain information as required or authorized by law, including the personal information of other individuals and information that is subject to an investigation. Upon such written request, you shall: (a) be informed of the existence, use and disclosure of your Personal Information and (b) be given access to that Personal Information. Any questions can be directed to the Chief Privacy Officer.

Changes to our Privacy Policy

SHOPS AT UNIVERCITY reserves the right to change this Privacy Policy from time to time. If we make a material change, this Privacy Policy will be updated accordingly. We recommend that you periodically review this Privacy Policy, which is available in our site office and on our website www.SHOPS AT UNIVERCITY.CA, so that you are aware of any changes. Your continued reading of the policy and use of our site following the posting of any changes to this Privacy Policy shall constitute your acceptance of these changes.

Responsibility for compliance with our Privacy Policy

Our Chief Privacy Officer is responsible for overseeing SHOPS AT UNIVERCITY's compliance with this Policy and may be contacted at the following address:

Chief Privacy Officer, Shops at Univercity
8960 University High Street
Suite 130
Burnaby, BC V5A 4Y6 (604) 684-5858

Questions or concerns about our privacy practices

Please address any questions or concerns about our compliance with this Policy or our privacy practices generally to the Chief Privacy Officer.

If you remain unsatisfied after discussing the matter with our Chief Privacy Officer, please contact the Privacy Commissioner of Canada at www.privcom.gc.ca or at the following address:

112 Kent Street Ottawa, Ontario IJA 1H3
E-mail: info@privcom.gc.ca

Telephone: (613) 995-8210
Toll-free: 1-800-282-1376
Fax: (613) 947-6850