

Mirabella Development Corporation: Privacy Policy

Effective Date: September 14, 2021

Mirabella Development Corporation, their respective affiliates and associated consulting and management companies (collectively, “**Mirabella**”, or the “**Company**”, “**we**” or “**us**”) recognize the importance of privacy and the sensitivity of Personal Information (defined below). This Privacy Policy outlines how we manage your personal information and safeguard your privacy. It also describes how we will collect and use email addresses and text numbers to send you commercial electronic messages. This Privacy Policy applies to the Company’s customers and potential customers, users of our Sites (defined below) and to any other person who provides Personal Information to the Company.

Your Privacy Rights

At Mirabella we value your business and respect your privacy rights. We want you to feel secure about the Personal Information you provide to us. The Company is responsible for the personal information we collect, use, maintain and disclose in compliance with PIPEDA and other applicable privacy laws. We comply with the federal government’s *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”) and with all applicable privacy laws, including any private-sector privacy law that may be enacted in the Province of Ontario. We are also responsible to collect and use email addresses and text numbers in compliance with CASL. We comply with *Canada’s Anti-Spam Legislation* (“**CASL**”) with respect to our marketing emails and texts.

This Policy applies to our interactions with potential customers, customers and other members of the public through our corporate websites or websites for specific properties or communities (the “**Sites**”) as well as to interactions that take place in person or through other modes of communication. To ensure our own accountability, we have developed this Policy and trained our staff about our policies and practices.

What is “Personal Information?”

Personal information is any information that identifies you, or by which your identity could be deduced, such as:

- Contact information: your name, home and business addresses, phone number(s), social media addresses;
- Your e-mail address(es), an IP address, which may be combined with information about your use of a Site, and phone numbers to which text messages may be sent;
- Information relating to developments, properties, communities or units that you may be interested in, or may purchase;

- For purchasers and potential purchasers, detailed identification, credit reporting and financial information including your Social Insurance Number, occupation, whether you are an investor or end-user, solicitor information, FINTRAC identification number, and transaction and payment information, including bank account and credit card information. This information will be collected and used as provided for in applicable purchase and other agreements, as well as to comply with anti-money laundering laws; and
- Where you provide Personal Information to us about other people (e.g., family members, co-owners, co-tenants) you must ensure that you have given those individuals appropriate notice that you are providing that information to us and have obtained their consent to disclose that personal information to the Company.

Why Do We Collect Personal Information From You?

We collect Personal Information from you to:

- Respond to inquiries that you may make with respect to developments, properties, communities or units, and to better understand your interests and needs;
- Communicate with you about and to market new developments, properties, communities or units that you have expressed interest in, or which we feel will reflect your interests;
- Communicate with you to respond to inquiries, to clarify your interests, to facilitate viewings and visits to our properties, communities and model suites and to consider offers to purchase;
- Better understand the interests and needs of potential customers for our developments, properties and communities;
- Confirm your identity;
- Facilitate credit checks, purchase agreements, financing arrangements, to comply with anti-money laundering legislation, and to respond to questions or requests from you or from third parties as authorized by you (e.g., your bank);
- Complete transactions and process payments;
- Facilitate access to and use of a Site;
- For the cookies used on a Site, to enable our server to recall information from a previous request or transaction. You may set your browser to turn cookies off, but this may affect the functionality of a Site for you; and
- Send commercial electronic messages (“**CEMs**”) by e-mail or by text, to respond to an inquiry from you, when you agree in advance to receive CEMs, or where we have your implied consent as set out in CASL, such as where we have an existing business relationship with you.

How Do We Collect Your Personal Information?

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible we collect Personal Information directly from you, but we may also obtain Personal Information about you in other ways and from other sources, such as:

- Directly from you, when you send a request or inquiry to us, register your interest in a development, property of community, or when you reply to an information request from us. Your consent may be express or may be implied by the nature of the communication. For example, we will collect Personal Information when you make an inquiry about one of our properties or communities, register to receive emails or make information requests, set up an appointment to visit a sales centre, engage in a phone call with members of our sales and marketing teams or our agents, participate in a site visit, provide feedback to an online survey or complete a questionnaire, participate in promotional contests or other offers, or make an offer to purchase;
- Indirectly from you, based on your communication with us, your social media posts (e.g., Facebook, Instagram), your feedback to a Site or to marketing communications we send to you, or based on your participation in events that we sponsor or attend with you; and
- Indirectly from you, based on your mailing address, telephone number, IP address, browser type and version and any identifiers associated with your communications to us.

Consent

In most cases, we shall ask you to provide explicit consent (in writing, or verbally) if we collect, use, or disclose your personal information. Sometimes, your consent may be implied through your conduct or communication with us.

How Do We Use Your Personal Information?

We use your Personal Information as identified above under, “Why Do We Collect Personal Information From You?”

Aggregated, non-identifiable information. Mirabella uses aggregated, non-identifiable information, which is not Personal Information that can be associated with any individual, for its internal marketing purposes, e.g. to track interest in and responses to a Site, and in our properties and communities. Aggregated information may be used to design programs and promotions that may be of interest to identified groups of customers or potential customers.

How Do We Disclose Your Personal Information?

We do not sell, rent or trade any of the Personal Information that we collect. We disclose Personal Information to our agents, professional advisors, promotional and marketing agencies and other service providers in connection with the services that they provide to the Company. For example, potential customer and customer Personal Information will be disclosed to professional advisors and service providers in connection with our marketing and sales within our properties or communities. In addition, we may disclose Personal Information to third-party financial institutions or credit card processors in association with payments for products or services.

Under certain circumstances, the Company will also disclose Personal Information, including:

- When you have consented to the disclosure;
- As permitted by law, e.g., to engage in business-to-business marketing or referral marketing as permitted by CASL.
- When we are required or authorized by law to do so, for example to comply with anti-money laundering requirements or to comply with a subpoena or court order;
- When the products or services we are providing to you require us to give your information to a third party, your consent will be implied, unless you tell us otherwise;
- Where it is necessary to establish or collect amounts owed to us or in association with legal proceedings to establish, protect or defend our legal rights;
- If the Company or its assets are sold to another business, we may disclose your Personal Information to the buyer since customer information is typically one of the assets that is transferred on the sale of a business;
- Where we engage a third party service provider, such as a host for a Site, other technology providers (including for email, and computer back-up services, archival file storage), or accounting, legal and marketing service providers, and the third party is bound by this Privacy Policy; or
- Where the information is already publicly known.

In addition, Mirabella may disclose certain aggregated, non-identifiable information, to partners and advertisers, e.g. to track interest in and responses to advertisements posted on a Site.

Is My Personal Information Secure?

The Company takes all reasonable precautions to ensure that your Personal Information is kept safe from loss, unauthorized access, modification or disclosure. However, because the transmission of information via the Internet is not completely secure we cannot guarantee the security of your Personal Information and such transmission is at your own risk. Among the steps taken to protect your Personal Information are:

- Physically securing our office premises and other locations where Personal Information may be stored or accessed;
- Restricting access to Personal Information, including limiting access to those of our employees, service providers, and others who need it for their work with the Company;
- Using secure servers and competent technology and telecommunications service providers for technology and business services;
- Deploying technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access; and
- Maintaining Personal Information in secure databases which are protected by internal user ids, passwords and security policies.

How Can You Access and Update Your Personal Information?

It is important that the Personal Information we hold about you be accurate and up-to-date. If any of your contact or other Personal Information changes, please inform us so that we can make any necessary changes.

As provided for in PIPEDA, you have the right to access any Personal Information we hold about you. Summary information is available on request. More detailed requests which require archive or other retrieval costs may be subject to our normal professional and disbursement fees.

As provided for in PIPEDA, you also have the right to correct or update any Personal Information we hold about you. Following receipt of notification from you, the Company will take reasonable steps to correct it.

If you opt-out or Unsubscribe to CEMs as described in CASL, we will update our records within ten (10) business days of the date of your request. We will not send any CEMs to you after that, although as permitted by CASL we may continue to communicate with you to respond to inquiries, or with respect to an existing business relationship between you and the Company (such as a purchase) for as long as we have an existing business relationship with you.

Can I be Denied Access to My Personal Information?

Your rights to access your Personal Information are not absolute. We may deny access as provided for by PIPEDA, including when:

- Denial of access is required or authorized by law;
- When granting you access would create risks for other people's privacy rights;
- To protect the Company's rights and property; or
- Where the request is frivolous or vexatious.

If we deny your request for access to, or refuse a request to correct information, we shall explain why.

Credit Reporting and Anti-Money Laundering

To help us make credit decisions about our customers, to prevent fraud, to confirm the identity of customers, and to comply with anti-money laundering regulations, we may on occasion request information about you from the files of consumer reporting agencies.

Third Party Websites

Our Sites may include links to web sites operated by third parties. Mirabella does not control, and does not assume any responsibility for the privacy practices, policies or actions of any third parties. Please review the privacy policies on each website and make your own informed decision whether or not to visit or provide Personal Information to such third parties.

Minors' Privacy

The Sites and the Company's products and services are not intended or permitted for use by minors under the age of majority in their jurisdiction of residence. In the event that we collected Personal Information from a minor without parental or guardian consent, please contact our Privacy Officer identified below and we will delete that information.

How Long Do You Retain my Personal Information?

We keep your personal information as long as is reasonably necessary for us to respond to your inquiry, engage in follow-up marketing to reflect your interests, to facilitate a purchase that you may make from the Company, and to market and deliver future products and services to you based on the existing business relationship that we may have. We will retain your Personal Information as long as necessary for these purposes, including in connection with payments or collections, or as may be permitted or required by law (e.g. anti-money-laundering laws), whichever is longer.

Communicating with Us

Although we are careful to take the security precautions described above, please be aware that the use of telecommunications (use of a Site, emails, or texts) can never be guaranteed to be 100% secure. You may decide to provide Personal Information or other confidential information to us in person, by personal delivery or by mail.

Changes to Our Privacy Policy

This Policy is effective as of the date referenced above, and may be updated from time to time. Updated versions will be posted on each Site, and are also available upon request from the Privacy Officer identified below.

Privacy Officer Contact

You have the right to access, verify and correct or update your Personal Information in our files. To make a request to access, update or delete your Personal Information, or if you have any questions about this Privacy Policy please contact our Privacy Officer:

By mail: Privacy Officer, 2 St. Clair Ave. W, Suite 1201, Toronto, ON M4V L15

By e-mail: info@mirabellacorp.com

Please note that a decision to withhold certain Personal Information may limit your ability to complete purchases from Mirabella, or to access certain promotions or features of a Site.

To Unsubscribe, or opt-out of receiving CEMs from us, please use the Unsubscribe mechanism contained in any of our messages or contact the Privacy Officer with that request. Your request can be tailored to limit the CEMs you wish to receive or to stop receiving them entirely.

Governing Law

This Privacy Policy and any disputes that may arise in connection with it shall be governed by the laws of the province of Ontario and by applicable federal law. Any disputes shall be resolved in provincial courts located in Toronto, Ontario.

Employment Inquiries

Although PIPEDA does not apply to our employee information, we have elected to follow privacy best practices in this area. If you apply to the Company for a job, or to work with us on a short term contract, we will collect and use your Personal Information as part of our application review process. We may collect, use and disclose additional information beyond that described in this Policy; for example, to confirm your education, certifications and qualifications, contacting references, or conducting criminal or financial reference checks. We normally retain information from applicants after a decision has been made for possible use in connection with future job openings. Please let us know if you would like us not to retain your personal information for this purpose. If we offer you a job, which you accept, the personal information will be retained as described in our procedures relating to employee records.