PRIVACY POLICY
THE SHIU PONG GROUP

Philosophy Surrounding Privacy:

The Shiu Pong Group of Companies (as such term is defined below) values the trust that you have shown in our companies and, in turn, we are committed to maintaining the accuracy, confidentiality and security of your personal information. To that end, The Shiu Pong Group of Companies we have adopted this privacy policy.

For purposes of this privacy policy, the **Shiu Pong Group of Companies** shall include the following companies: Shiu Pong Enterprises (Canada) Inc.and its affiliates, including without limitation, Shiu Pong Developments Limited, Shiupong (231 College) Limited and Shiu Pong Management Limited.

This policy explains how The Shiu Pong Group of Companies collects, uses, discloses and safeguards the personal information provided to us either directly by you or by a third party. If you would like further information about how a particular member of the Shiu Pong Group of Companies collects, uses or discloses your personal information please contact **Thomas Lam** at **416.596.8885** (phone), **416.596.1700** (fax) or write Mr. Thomas Lam at **131 Baldwin Street, Toronto, Ontario, M5T 1L7**, Attention: Thomas Lam, thomasl@shiupong.com (email)

By providing personal information to us or authorizing a third party to provide your personal information to us, you signify your consent to The Shiu Pong Group of Companies' collection, use and disclosure of your personal information in accordance with this privacy policy.

For purposes of this privacy policy, **"personal information"** shall mean any information that can identify an individual directly or through other reasonably available means. Personal information will not include an individual's business address or business telephone number.

As part of The Shiu Pong Group of Companies' commitment to treat your personal information with respect, each of our members operate in accordance with the following ten principles (the **"Principles"**):

- Principle 1 - Accountability
- Principle 2 - Identifying Purposes
- Principle 3 - Consent
- Principle 4 - Limiting Collection
- Principle 5 - Limiting Use, Disclosure and Retention
- Principle 6 - Accuracy
- Principle 7 - Safeguarding Customer Information
- Principle 8 - Openness
- Principle 9 - Customer Access
- Principle 10 - Handling Customer Complaints and Suggestions

Principle 1 - Accountability

We will maintain and protect the personal information under our control. We have designated an individual who is accountable for compliance with the Principles. If you have a question about privacy, confidentiality or the personal information handling practices of The Shiu Pong Group of Companies, our employees or service suppliers, please contact **Mr. Thomas Lam** at:

131 Baldwin Street
Toronto, Ontario
M5T 1L7
Attention: Thomas Lam

Phone: 416.596.8885
Fax: 416.596.1700
Email: thomasl@shiupong.com

Principle 2 - Identifying Purposes

We will identify the purposes for which we collect personal information in this privacy policy at or prior to the time of collection of the personal information. In regard to the personal information collected by Shiu Pong Developments Limited, Shiupong (231 College) Limited and Shiu Pong Management Limited, please see below for the list of reasons why such entities collected your personal information. Such list is

broken out into the purposes Shiu Pong Developments Limited, Shiupong (231 College) Limited collects personal information and the purposes Shiu Pong Management Limited collects personal information.

Principle 3 - Consent

Except where required or permitted by law, your informed consent is required for our collection, use or disclosure of your personal information. With respect to personal information collected before the publication of this policy, The Shiu Pong Group of Companies will only use or disclose this personal information for the purposes for which it was collected (except as required or permitted by law). If you have any questions at all about why your personal information was collected by a particular member of The Shiu Pong Group of Companies, please do not hesitate to contact us at the contact information provided under Principle 1 above which is restated on the first page and the last page of this privacy policy.

By providing personal information to us or authorizing a third party to provide your personal information to us, you signify your consent to The Shiu Pong Group of Companies' collection, use and disclosure of your personal information in accordance with this privacy policy.

Principle 4 - Limiting Collection

The personal information collected by us shall be limited to those details necessary for the purposes identified to you at or prior to its collection.

Principle 5 - Limiting Use, Disclosure and Retention

We will only use or disclose your personal information in accordance with the purposes for which it was originally collected unless you have otherwise consented, or when it is required or permitted by law. We will retain your personal information only for so long as is required to fulfill the purpose for which it was collected or as required by law. In regard to the personal information collected by Shiu Pong Developments Limited, Shiupong (231 College) Limited and Shiu Pong Management Limited, please see below for the list of reasons how such entities use your personal information and why such entities might need to disclose your personal information to third parties. Such list is broken out into how Shiu Pong Developments Limited, Shiupong (231 College) Limited uses and discloses your personal information and how Shiu Pong Management Limited uses and discloses your personal information.

If you have any questions at all about how a particular member of The Shiu Pong Group of Companies uses and discloses your personal information, please do not hesitate to contact us at the contact information provided under Principle 1 above which is restated on the first page and the last page of this privacy policy.

Principle 6 - Accuracy

We shall make every reasonable effort to ensure your personal information is maintained in an accurate, complete and up-to-date form.

Principle 7 - Safeguarding Customer Information

We shall utilize no less than industry standard security safeguards to protect your personal information.

Principle 8 - Openness

A copy of this privacy policy can be obtained by contacting our office at the address listed on the last page of this policy.

Principle 9 - Customer Access

Upon your request, we shall inform you of: (i) the type of personal information we have collected; (ii) how we have used your personal information in the past and how we may use it in the future; and (iii) whether or not we have disclosed your personal information to any third parties (and, if so, to whom). Individuals may verify the accuracy and completeness of their personal information and may request that it be amended, if appropriate.

Please note that before we are able to provide you with any information or correct any inaccuracies we may ask you to verify your identity and to provide other details to help us to respond to your request.

Principle 10 - Handling Customer Complaints and Suggestions:

Customers may direct any questions or enquiries with respect to this privacy policy or about our information handling practices by contacting Shiu Pong at the address listed on bottom of this privacy policy.

PLEASE NOTE:

Shiu Pong Developments Limited, Shiupong (231 College) Limited And Shiu Pong Management Limited Each Collect Different Kinds Of Personal Information And For Different Purposes. To This End, Below We Have Provided Details For Each Of Shiu Pong Developments Limited , Shiupong (231 College) Limited And Shiu Pong Management Limited Regarding The Type Of Personal Information They Collect And The Purposes For Such Collection.

SHIU PONG DEVELOPMENTS LIMITED / SHIUPONG (231 COLLEGE) LIMITED

Types of Information Shiu Pong Developments Limited, Shiupong (231 College) Limited Collects:

The following is a description of the type of personal information that we may ask for:

(a) full name of each purchaser, home address, email address, facsimile number, telephone number, age, date of birth, marital status, occupation, employment status, current home ownership details and intention regarding rental or owner occupation of the unit;

(b) residency status, social insurance number**,** business identification number and GST registration number;

(c) financial and other information relating to each purchaser as may be reasonably required by Shiu Pong Developments Limited, Shiupong (231 College) Limited in order to confirm credit worthiness and ability to complete the transaction of purchase and sale; and

(d) information regarding each purchaser's preferred suite design and colour/finish selections.

The choice to provide us with your personal information, either directly or through a third party, is always yours. However, your decision to withhold particular information may result in limiting our ability to provide you with the services or products you requested or may result in adverse withholding tax or GST consequences or may result in Shiu Pong Developments Limited, Shiupong (231 College) Limited terminating the agreement of purchase and sale.

The Purposes Of Our Collection And The Uses We Make Of Your Personal Information:

At Shiu Pong Developments Limited, Shiupong (231 College) Limited , we gather and use personal information in order to:

(e) market, advertise and/or sell various products and/or services to purchasers;

(f) obtain information on customer preferences for future developments through surveys, newsletters, publications, special events and other market research activities;

(g) assist third-party marketing or data processing companies which handle or process marketing campaigns on behalf of Shiu Pong Developments Limited, Shiupong (231 College) Limited or other companies that are associated with, related to or affiliated with Shiu Pong Developments Limited, Shiupong (231 College) Limited and who may send

(by e-mail or other means) promotional information about new condominiums and/or related services to purchasers;

(h) assist financial institutions providing (or wishing to provide) mortgage financing, banking and/or other financial or related services to purchasers;

(i) assist lawyers providing (or wishing to provide) legal services to purchasers;

(j) assist title insurance companies providing (or wishing to provide) title insurance to purchasers;

(k) assist Shiu Pong Developments Limited's, Shiupong (231 College) Limited's, construction lender, the project monitor, Shiu Pong Developments Limited's, Shiupong (231 College) Limited designated take-out lender, the Ontario New Home Warranty Program and/or any warranty bond provider and/or excess condominium deposit insurer engaged in connection with the development and/or construction financing of each project;

(l) assist insurance companies providing (or wishing to provide) insurance coverage with respect to the property (or any portion thereof) and/or the common elements of the condominium project, including without limitation, any title insurance companies providing (or wishing to provide) title insurance to purchasers or their mortgage lenders;

(m) assist trades/suppliers or sub-trades/suppliers who have been retained by or on behalf of Shiu Pong Developments Limited, Shiupong (231 College) Limited (or who are otherwise dealing with Shiu Pong Developments Limited , Shiupong (231 College)Limited) to facilitate the completion and finishing of the units and the installation of any extras or upgrades ordered or requested by purchasers;

(n) assist providers of cable television, telephone, telecommunication, hydro-electricity, chilled water/hot water, gas and/or other similar or related services to the property and/or the condominium;

(o) assist relevant governmental authorities or agencies including, without limitation, the Land Titles Office (in which the condominium is registered), the Ministry of Finance for the Province of Ontario (i.e. with respect to Land Transfer Tax), and Canada Customs & Revenue Agency (i.e. with respect to the GST);

(p) assist Canada Customs & Revenue Agency, to whose attention the T-5 interest income tax information return and/or the NR4 non-resident withholding tax information return is submitted (where applicable), which will contain or refer to purchasers' social insurance numbers or business registration numbers (as the case may be), as required by Regulation 201(1)(b)(ii) of The Income Tax Act;

(q) assist Shiu Pong Developments Limited's, Shiupong (231 College) Limited's solicitors and purchasers' solicitors to facilitate interim occupancies and final closings, including closings by electronic means via the Teraview Electronic Registration System and electronic delivery of documentation via the internet; and

(r) assist the condominium corporation for purposes of facilitating the completion of the corporation's voting, leasing and/or other relevant records, and to assist the condominium's property manager for the purposes of facilitating the issuance of notices, the collection of common expenses and/or implementing other condominium management/administration functions.

We also use the personal information you have provided to us to communicate with you and safeguard your interests. We will send you important notices and respond to any special needs or enquiries you may have. We only use personal information for the purposes that we have disclosed to you. If for any reason your information is required to fulfill a different purpose, we will obtain your consent before we proceed.

How Shiu Pong Developments Limited , Shiupong (231 College)Limited, Collects Personal Information:

We may gather personal information from you when you visit our website, when you visit our sales presentation centre, when you sign an agreement of purchase and sale, from your solicitor prior to occupancy or final closing, from third-party agencies that provide credit check information, over the telephone or by corresponding with you via mail, facsimile, the internet, or from other third parties who have your authority to disclose personal information to us.

While we try to ensure that every third party who discloses personal information to us has your consent to do so, if you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party. If they do not adequately respond to your inquiries, please let us know immediately.

SHIU PONG MANAGEMENT LIMITED

Types of Information Shiu Pong Management Limited Collects:

The following is a description of the type of personal information that we may ask for:

(a) full name of each tenant / prospective tenant / customer, home address, email address, facsimile number, telephone number, age, date of birth, marital status, occupation, employment status including employment letter to certify current salary, current home ownership details and intention regarding rental, the intended trade of business to be used in the unit and experience in the intended trade of business;

(b) residency status**,** social insurance number, business identification number and GST registration number;

(c) financial and other information relating to each tenant / prospective tenant / customer as may be reasonably required by Shiu Pong Management Limited in order to confirm credit worthiness and ability to complete the transaction of leasing, lease renewal, lease assignment, lease amendment, and management agreement and;

(d) information regarding each tenant's / prospective tenant's / customer's preferred unit location, renovation layout, colour/finish selection, date of commencement of lease and date of occupancy.

The choice to provide us with your personal information, either directly or through a third party, is always yours. However, your decision to withhold particular information may result in limiting our ability to provide you with the services or products you requested or may result in adverse withholding tax, relevant non-resident taxes or GST consequences or may result in Shiu Pong Management Limited terminating and or the postponement of the agreement of Lease, Offer to Lease, Assignment of Lease, Renewal of Lease, Amendment of Lease and the Management Agreement.

The Purposes Of Our Collection And The Uses We Make Of Your Personal Information:

At Shiu Pong Management Limited, we gather and use personal information in order to:

(a) market, advertise and/or lease various product and/or services to tenant and/or prospective tenant;

(b) obtain information on customer preferences for future re-developments, advertising and promotional events and leasing and marketing through surveys, newsletters, publications, special events and other market research activities;

(c) assist third-party marketing or data processing companies which handle or process marketing campaigns on behalf of Shiu Pong Management Limited or other companies that are associated with, related to or affiliated with Shiu Pong Management Limited, and who may send (by e-mail or other means) promotional information about new buildings/shopping malls and/or related services to customers/tenants;

(d) assist lawyers providing (or wishing to provide) legal services to customers/tenants;

(e) assist insurance companies providing (or wishing to provide) building insurance coverage with respect to the property (or any portion thereof) and/or the common elements of the building, including without limitation, any insurance companies providing (or wish to provide) the insurance to customer, tenant;

(f) assist Shiu Pong Management Limited's lender, mortgagee to provide operating loan and or mortgage to the property;

(g) assist maintenance contractors/suppliers or sub-contractors/suppliers who have been retained by Shiu Pong Management Limited to facilitate the maintenance, cleanliness and safety of the property;

(h) assist relevant governmental authorities or agencies including, without limitation, the government agencies responsible for issuing building permits, liquor licenses, and the Ministry of Finance for the Province of Ontario and Canada Customs & Revenue Agency (i.e. with respect to the GST);

(i) assist Canada Customs & Revenue Agency, to whose attention the T-5 interest income tax information return and or the NR4 / NR6 non-resident withholding tax information return is submitted (where applicable), which will contain or refer to purchasers' social insurance numbers or business registration numbers (as the case may be), as required by Regulation 201(1)(b)(ii) of The Income Tax Act;

(j) assist Shiu Pong Management Limited's solicitors and/or solicitors of Shiu Pong Management Limited's mortgagee to facilitate the register the loan / mortgage by electronic means via the Teraview Electronic Registration System and electronic delivery of documentation via the internet; and

(k) assist Shiu Pong Management Limited (the landlord and/or the property manager for purposes of facilitating the completion of leasing, sub-leasing, assignment of lease and/or other relevant records, and to assist the building's property manager for the purposes of facilitating the issuance of notices, the collection of rent and additional rents, implementing other building management/administration functions and/or promotional activities.

We also use the personal information you have provided to us to communicate with you and safeguard your interests. We will send you important notices and respond to any special needs or enquiries you may have. We only use personal information for the purposes that we have disclosed to you. If for any reason your information is required to fulfill a different purpose, we will obtain your consent before we proceed.

How Shiu Pong Management Limited Collects Personal Information:

We may gather personal information from you when you visit our website, when you enquire the leasing information from our employee, representative, or agent, when you submit your Offer to Lease, letter of intent to lease, sub-lease, renewal, amendment of lease and assignment of lease, from third-party agencies that provide credit check information, over the telephone or by corresponding with you via mail, facsimile, the internet, or from other third parties who have your authority to disclose personal information to us.

While we try to ensure that every third party who discloses personal information to us has your consent to do so, if you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party. If they do not adequately respond to your inquiries, please let us know immediately.

THE SHIU PONG GROUP OF COMPANIES
General Information

Our Employees and Your Personal Information:

In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized employees of The Shiu Pong Group of Companies who have a legitimate business purpose and reason for accessing it. For example, when you call us, our designated employees will access your information to verify who you are and to assist you in fulfilling your requests.

As a condition of their employment, all employees of The Shiu Pong Group of Companies are required to abide by the privacy standards we have established. Employees are informed about the importance of privacy and they are required to agree to a code of conduct that prohibits the disclosure of any customer information to unauthorized individuals or parties.

Unauthorized access to and/or disclosure of personal information by an employee of The Shiu Pong Group of Companies is strictly prohibited. All employees are expected to maintain the confidentiality of personal information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

When May Members of The Shiu Pong Group of Companies Disclose Personal Information to Outside Parties:

Except as specifically provided for in this privacy policy, we do not disclose any personal information to third parties. The following are the limited instances where we may disclose your personal information to third parties:

- to investigate potentially fraudulent or questionable activities regarding your merchant account(s) or the use of our services;
- to offer you related products and services that might benefit you;
- in anticipation of and in the course of an actual or potential sale, reorganization, consolidation, merger or amalgamation of our business; and
- when required or permitted by law.

The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the request have legitimate grounds to do so.

There are some situations where we are legally permitted to disclose personal information such as employing reasonable and legal methods to enforce our rights or to investigate suspicion of illegal activities.

How The Shiu Pong Group of Companies Safeguards Your Private Information:

We use industry standard technologies and maintain current security standards to ensure that your personal information is protected against unauthorized access, disclosure, inappropriate alteration or misuse.

Electronic customer files are kept in a highly secured environment with restricted access. Paper-based files are stored in locked filing cabinets. Access is also restricted.

We manage our server environment appropriately and our firewall infrastructure is strictly adhered to. Our security practices are reviewed on a regular basis and we routinely employ current technologies to ensure that the confidentiality and privacy of your information is not compromised. When you call our customer service department you will be required to verify your identity by providing some personally identifying information.

Accessing and Amending Your Information:

You have the right to access, verify and amend the information held in your personal files. You may access and verify any of your information by calling The Shiu Pong Group of Companies' customer service department at **416.596.8885**.

To help us keep your personal information up-to-date, we encourage you to amend inaccuracies and make corrections as often as necessary. Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file, we will make the proper changes. Where appropriate, we will communicate these changes to other parties who may have unintentionally received incorrect information from us.

Questions, Concerns and Complaints:

If you have a question about privacy, confidentiality or the personal information handling practices of The Shiu Pong Group of Companies, our employees or service suppliers, please contact Barbara Kwan at:

131 Baldwin Street
Toronto, Ontario
M5T 1L7
Attention: **Thomas Lam**

Phone: 416.596.8885
Fax: 416.596.1700
Email: **thomasl@shiupong.com**

Before Shiu Pong is able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will endeavour to respond within an appropriate timeframe.

Changes to and Updating this Privacy Policy:

Any changes to The Shiu Pong Group of Companies' privacy policy and information handling practices will be acknowledged in this policy in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so. You may determine when this policy was last updated by referring to the modification date found at the bottom of this privacy policy.

Last revised: April 18, 2016

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