

***Paddington Green***  
***Winnipeg Condominium Corporation #85***

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**Privacy Policy**

In accordance with the legal requirements, the Board of Directors of Winnipeg Condominium Corporation No. 85 has established the following Privacy Policy.

Winnipeg Condominium Corporation No. 85 respects its owners' privacy and is committed to protecting personal information that it collects, uses and discloses. Winnipeg Condominium Corporation No. 85 commits to upholding its obligations under the **Personal Information Protection and Electronic Documents Act ("PIPEDA")** and as such explains our privacy practices within the "guiding principles" set out in PIPEDA which organizations are required to comply with.

The Board of Directors of Winnipeg Condominium Corporation No. 85 will designate a Privacy Officer who will be responsible for the following:

- 1) Responding to requests for access to personal information;
- 2) Addressing issues that may arise concerning personal information;
- 3) Working with the Office of the Information and Privacy Commissioner during the investigation of any privacy complainants against Winnipeg Condominium Corporation No. 85.

**Scope and Application**

This Privacy Policy applies to information about an identifiable individual ("personal information"), but does not include the name, title, business address or telephone number of an employee of an organization, in any form, collected, used or disclosed by Winnipeg Condominium Corporation No. 85 in the course of its activities.

The application of this Privacy Policy is subject to the requirements and provisions of PIPEDA and other applicable laws.

**Principle 1 - Accountability**

**Winnipeg Condominium Corporation No. 85 is responsible for personal information under its control and shall designate one or more persons who are accountable for Winnipeg Condominium Corporation No. 85's compliance with the following principles.**

We are responsible for all personal information under our control and have designated the Winnipeg Condominium Corporation No. 85 Privacy Officer to oversee our privacy compliance. Other individuals within Winnipeg Condominium Corporation No. 85 or its management company may be delegated to act on behalf of the Winnipeg Condominium Corporation No. 85's Privacy Officer. We inform our employees and contractors, as appropriate, to honour this Privacy Policy.

As appropriate, we implement privacy practices to properly enforce this Privacy Policy and use contractual or other means to provide a comparable level of privacy protection while personal information is being processed or used by a third party.

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**Principle 2 - Identifying Purposes for Collection of Personal Information**

**Winnipeg Condominium Corporation No. 85 shall identify the purposes for which Personal Information is collected at or before the time the information is collected.**

We may collect personal information from you for the following purposes:

- to maintain our accounts receivable systems and to collect owners' contributions to the common expenses in a timely manner and in compliance with Winnipeg Condominium Corporation No. 85's declaration and by-laws;
- to maintain a "Unit Owner Information Listing" so that we may contact or communicate with you to provide services or information;
- to provide information to third parties, such as contractors, when necessary to complete renovations or repairs;
- to provide you with newsletters, communiques or other important information;
- to record information in the minutes of meetings of the owners and/or Board of Directors;
- to ensure that we have emergency contact information;
- to fulfill your requests for services or information;
- to assess your need for services and to refer you to service providers;
- to meet legal and regulatory requirements; or
- to carry out any other purpose that you have authorized or as permitted by law.

Examples of personal information that Winnipeg Condominium Corporation No. 85 regularly collects from its owners includes, without limitation:

- 1) Registered owner(s) name, unit number, phone number and mailing address if residing offsite;
- 2) Email address;
- 3) Banking information, (such as information required for automatic bank withdrawal of condo fees);
- 4) Occupant / tenant name, unit number and phone number;
- 5) Phone number to be entered into the Intercom/Telephone Entry System;
- 6) Emergency contact person: name and phone number;
- 7) Information on pets that reside in a unit.

Further reference to "identified purposes" mean the purposes identified in this Principle.

**Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information**

**The knowledge and consent of an individual are required for the collection, use, or disclosure of personal information, except where inappropriate. In certain limited circumstances personal information may be collected, used, or disclosed without the knowledge and consent of the individual.**

We generally collect, use, retain and disclose your personal information only with your knowledge and consent. We may depart from this general consent principle only in accordance with the limited exceptions set forth in applicable laws such as PIPEDA. In obtaining your consent, whether express or

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implied, we will explain the purposes for which we will manage your personal information. We will not depart from the identified purposes unless you have provided further consent or unless otherwise required or permitted by law.

You may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. However, if you withdraw your consent, we may not be able to provide you with certain services. Please contact us for more information regarding the implications of withdrawing consent.

**Principle 4 - Limiting Collection of Personal Information**

**Winnipeg Condominium Corporation No. 85 shall limit the collection of personal information to that which is necessary for the purposes identified by Winnipeg Condominium Corporation No. 85. Winnipeg Condominium Corporation No. 85 shall collect personal information by fair and lawful means.**

We typically collect personal information directly from you only as necessary for the purposes identified in this Privacy Policy.

**Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information**

**Winnipeg Condominium Corporation No. 85 shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Winnipeg Condominium Corporation No. 85 shall retain personal information only as long as necessary for the fulfillment of those purposes.**

We will not use or disclose personal information for purposes other than those purposes for which it was collected, except with your consent or as required or permitted by law. We may disclose your personal information:

- with your consent, whether express or implied;
- to third party agents, suppliers or contractors engaged by us to perform functions on our behalf;  
or
- where required or permitted by law.

In such circumstances, we will not disclose more information than is required. We will also, whenever it is reasonable and practicable to do so, enter into privacy agreements with third parties with whom we share personal information.

We will retain personal information for a period of time only as long as it remains necessary or relevant for the identified purposes or as required or permitted by law.

**Principle 6 - Accuracy of Personal Information**

**Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.**

We make reasonable efforts to ensure that the personal information we collect, use or disclose is as accurate, complete and up-to-date as necessary for the purposes for which it is to be used. If you find

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any errors in our personal information holdings, we should be informed and will make the appropriate corrections. We will convey these corrections to relevant third parties as appropriate. For personal information that remains in dispute, we will make note in our records of your opinion as to accuracy of the relevant personal information.

**Principle 7 - Security Safeguards**

**Winnipeg Condominium Corporation No. 85 shall protect personal information by security safeguards appropriate to the sensitivity of the information.**

We protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures.

**Principle 8 - Openness Concerning Policies and Procedures**

**Winnipeg Condominium Corporation No. 85 shall make readily available to individuals' specific information about its policies and procedures relating to the management of personal information.**

Please forward questions or concerns regarding our policies and procedures relating to the management of personal information to the Winnipeg Condominium Corporation No. 85 Privacy Officer.

**Principle 9 – Access to Personal Information**

**Upon request, Winnipeg Condominium Corporation No. 85 shall inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.**

You may access your personal information in our control by sending a written request to the Winnipeg Condominium Corporation No. 85 Privacy Officer. We may advise you in advance if there is a minimal charge to conduct a search of our records and will respond within 30 days. In some circumstances, we may not be able to provide certain personal information, but will explain our reasons for such a decision. Where you have been provided with access to your personal information, you may challenge the accuracy and completeness of your personal information and have it amended as appropriate.

**Principle 10 - Challenging Compliance**

**An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Winnipeg Condominium Corporation No. 85's compliance with The Winnipeg Condominium Corporation No. 85 Privacy Policy.**

All questions or concerns regarding our personal information management practices should be directed to the Winnipeg Condominium Corporation No. 85 Privacy Officer. We will investigate all complaints concerning compliance with this Privacy Policy and if a complaint is found to be justified,

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we shall take the appropriate measures to resolve the complaint including, if necessary, amending our privacy policies and procedures.

**Additional Information**

Please contact the Winnipeg Condominium Corporation No. 85 Privacy Officer at: Sunrex Management <paddingtongreen@sunrex.ca>