

**PRIVACY POLICY**

Effective Date: August 28, 2025

At G & E Construction, we respect your privacy and take great care in protecting your personal information. As a leading homebuilder, developer and investment manager, we are a fully integrated real estate company that interacts with tenants, homeowners, prospects, investors and visitors of our websites and mobile applications daily. Through these interactions, our customers and stakeholders entrust us with their personal information.

Individuals rely on us to safeguard personal information and ensure its responsible collection and use. To do so, we have committed to the following principles:

1. We will be transparent about how we handle your personal information and our privacy practices;
2. We will use your personal information to benefit you and enhance your customer experience;
3. We will protect your personal information and handle it responsibly.

Definition of Personal Information

“Personal information” is any information about an identifiable individual, other than an individual’s business contact information that is used to communicate with the individual in relation to their business, employment or profession. Thus, personal information includes, but is not limited to, your name, contact information, date of birth, financial information (including account numbers, payment history, credit limits and cred scores), hours of availability, personal preferences and interests, family size, income, employment details, opinions, information collected during background checks, information collected automatically when you interact with us online, and demographics that help G & E Construction service your specific needs.

Personal information does not include anonymous or aggregated information that cannot be tracked back to you personally. Aggregate information refers to personal information compiled and expressed in a summary form where no personal identifiers are included. For example, we may use aggregate data to improve the quality and efficiency of our programs, products and services, and to enhance our marketing efforts.

Table of Contents

1. Scope And Application
2. How Do We Collect Personal Information?
3. How Do We Use Personal Information?
4. How Do We Share Personal Information?
5. How Do We Manage Consent?
6. How Do I Change My Privacy Choices?
7. How Do We Protect and Store Personal Information?



- 8. What Are Your Rights in Relation to Your Personal Information?
- 9. How Do I Know if there are Changes to the Privacy Notice?
- 10. Who Do I Contact with Privacy Questions?

## 1.0 Scope and Application

This Privacy Notice ("Notice") relates to the personal information collected by G & E Construction. In this Notice, we describe what personal information we collect; how we use, share and manage it; how you can access, update and/or correct your personal information; and the privacy choices available to you.

### A. What does this Privacy Notice Include?

This Notice describes how we handle your personal information specifically, what we collect, and how we collect it, use, share, protect and store it. We also explain your Privacy Choices and how you can exercise those choices.

This Notice applies to you when you visit one of our websites, sign up to receive information from us, register for any of our programs, promotions or events, express interest in or receive any of our products or services, or enter into a contract with us.

Please note that additional terms and conditions may apply to how we use or manage your personal information when you engage with us under certain circumstances. For example, you are required to accept terms and conditions when you enter into a contract with G & E Construction. Those terms and conditions apply together with this Privacy Notice.

## 2.0 How Do We Collect Personal Information?

We limit the collection of personal information to what is reasonably required to fulfill the purposes for which it was collected. We collect personal information in a variety of ways, including: directly from you; from technologies used at our properties; from third parties who we engage to promote and support our business; and when you are interacting with us online or through our mobile applications.

We collect personal information in the following ways:

### *Directly From You:*

You may provide personal information to us on-site when you visit one of our properties, on the phone or via email when you express interest in one of our properties, through our websites or mobile applications, or in any other direct manner.

For example, when you voluntarily share information about yourself with us, we will collect that information in order to provide you with availability, respond to your inquiry, or for any other purpose disclosed to you at that time.

### *From Other Sources:*

We may receive personal information from other sources or if the law requires or permits us to do so (e.g., to meet our anti-money laundering compliance or other legal and regulatory obligations), and if we have your consent to do so (e.g. when we collect information from credit reporting agencies in order to process your application).

In order to ensure the accuracy of the personal information that you provide us, we may retain the services of a service provider to verify and, if necessary, update, complete or otherwise supplement your information. This helps us protect you and us against error and fraud, and to manage our business operations. It is the responsibility of those who provide us with information about you to comply with applicable laws and obtain any necessary consents. Similarly, if you provide us with personal information about another person, it is your responsibility to obtain consent from such person, for example, if you provide a personal guarantor's information.

*From Technologies Used at Our Properties:*

We may collect personal information through various types of technologies used across our properties, such as: video surveillance used for security purposes, to protect against theft, to prevent damage to our properties and to prevent fraud; and any devices used to collect information from rental or sales office walk-ins.

*Through our Websites and Mobile Applications:*

We may collect certain types of information electronically when you interact with our websites and mobile applications, email, social media accounts, online advertising, or through the use of our or a third party's technologies, which include cookies, web beacons, single pixel gifs and other technologies. This information helps us understand what actions you take on our websites and allows our sites to work correctly.

We may combine this information with other information collected about your existing or previous relationship with us, and aggregate demographic information, such as the average size of households in your area, which can help us gain insights about your interests and preferences. We do this to support our customer understanding, and to provide you with more tailored advertising and marketing communications. This includes serving interest-based advertising to you, subject to your right to withdraw consent.

The technologies we use include:

- Cookies, which are small text files that are saved on your computer when you visit a website so that information can be saved between visits, such as your previous property searches.
- Web beacons, and single pixel gifs, which are small image files that have information about you, such as your IP address, that can be downloaded when you visit a website or open an email. This allows us to understand your online behaviour, monitor our email delivery, and provide you with interest-based advertising. These tools also allow our third-party tracking tools to gather information, such as your IP address, and provide this back to us in an anonymized, aggregate form (i.e. in a manner that prevents us from identifying you personally).
- Data clean rooms, which are secure environments where de-identified personal information from one or more sources can be processed in accordance with defined rules and restrictions for analytics, measurement, data transformation or other purposes in a privacy-compliant manner.
- Other technologies, such as data management platforms, ad-buying platforms, ad servers, reporting tools and analytics engines, which pull usage data from multiple sources and help manage and collect this data to use for personalization, interest-based advertising, customizing content and other methods to gain insights into our customers' needs and preferences.
- You may delete or disable many of these technologies at any time via your browser. However, if you do so, you may not be able to use some of the features on our websites or mobile applications.

### 3.0 How Do We Use Personal Information?

We use your personal information to provide you with our programs, products, and services, to manage our business operations, to communicate offers and information we think might interest you, to enhance your customer experience with us, and as permitted or required by law.

We use your personal information for the following purposes:

#### A. Providing you with Exceptional Service

We use your personal information in order to provide you with our programs, products and services, which include:

- Understanding your needs and responding to inquiries or requests for information;
- Verifying your identity and the information that you provide to us;
- Processing your application, determining your eligibility to enter into a contract with us and completing business transactions such as the leasing or purchase of a property;
- Facilitating financing or approval of an application, and processing financial transactions;
- Providing appropriate levels of service following completion of a transaction, such as repairs, maintenance/correction of deficiencies, fulfilling homeowner options, and the provision of telecommunications and utility services; and
- Conducting customer satisfaction surveys.

#### B. Managing our Business

We use your personal information for many business reasons, which include:

- Deploying and managing our information technology applications and systems, including managing our websites and mobile applications;
- Facilitating the use of our websites and mobile applications, which may include using cookies and other similar technology;
- Enabling your participation in contests, promotions, surveys, chats, events;
- Maintaining the safety and security of our customers, employees and properties (e.g., through video surveillance and other monitoring technologies);
- Protecting contracting parties from errors and fraud;
- Monitoring and investigating incidents and managing claims; and
- Meeting our legal and regulatory obligations.

#### C. Communicating with You

We use your personal information to communicate with you for a variety of reasons, such as:

- Establishing a relationship with you, providing support, reminding you of upcoming appointments or events, as well as communicating about G & E Construction property updates, service developments or other G & E Construction news;
- Taking or verifying instructions from you;
- Providing safety and security services;
- Informing you of urgent matters, for example a health concern where we believe an exposure may have affected one of our properties, in accordance with public health laws; or a security concern that requires your attention;
- Informing you in a variety of ways (e.g., email, telephone, SMS, direct mail) about programs, products, services, special offers, promotions or events that may be of interest to you; and
- Delivering interest-based advertisements that may be of interest to you.

If you no longer wish to receive commercial electronic messages, please let us know by following the unsubscribe directions provided in any promotional messages sent by G & E Construction.

#### D. Conducting Market Research

We may use your personal information in order to conduct market research by tracking and analyzing current or previously collected information to improve or to develop new offerings, and to better understand our customer base. When doing so, we generally will use your information in an aggregated format or with direct personal identifiers removed.

#### E. Conducting Data Analytics

We may use your personal information in order to conduct data analytics or research for business purposes. Wherever possible, we use aggregated, anonymized or de-identified information and minimize the risk of re-identification.

Types of analytics and research we may perform include:

- Managing our properties and operations (e.g., analyzing and improving our costs);
- Improving our programs and offerings (e.g. improving our websites and mobile applications);
- Understanding customer needs and preferences and customizing how we tailor and market our properties to prospects based on their interests; and
- Measuring the effectiveness of our marketing.

#### F. Automated Decision Making

Automated decisions are defined as decisions about individuals that are based solely on the automated processing of personal information and that produce legal effects that significantly affect the individuals involved. In most cases, these tools assist, but do not replace, human judgment in making a decision. If automated decisions are made by G & E Construction, we will inform you, and affected persons will be given an opportunity to express their views on the automated decision in question and object to it.

### **4.0 How Do We Share Personal Information?**

We may share your personal information within our company or with our service providers (companies operating on our behalf) and other third parties (companies with which we provide programs, products or services) for the purposes described in this Notice and in accordance with applicable law. Additionally, if you authorize us to share information with a third party (for example if you add household members to your G & E Construction account), we may do so as necessary and in connection with your relationship to us.

We do not sell your personal information to any organization or person; the only exception to this would be if we sell or transfer any part of our business.

Categories of third parties and service providers with whom we may share personal information include:

- Property management companies
- Homebuilder partners
- Utility providers
- Tenant platforms for payment of rent and submission of maintenance or service requests
- Trades and contractors who perform various functions to provide or assist in the delivery of service
- Insurance and financial service providers
- Investment service providers
- Credit reporting agencies
- External legal counsel and auditors
- Software service providers



- Hosting and data storage service providers
- Marketing and direct advertising partners.

There are circumstances where a disclosure without consent is justified or permitted, for example in the context of a legal investigation or a request from law enforcement authorities, or where G & E Construction believes, upon reasonable grounds, that the disclosure is necessary to protect the rights or safety of an identifiable person or group.

We will not share your personal information outside of our group of companies, except as indicated below.

#### A. Service Providers

In the course of providing our programs, products, services, promotions and events we may share personal information with our service providers. These service providers help us operate our business, technology systems and applications, internal procedures, infrastructure, advertising, marketing, risk mitigation, and analytics capabilities as well as assist us with meeting our legal and regulatory obligations. They provide services to us such as property management, data hosting, email deployment, customer service, marketing, financial services, fraud mitigation, sales and processing or analysis of personal information. We require these service providers to limit their access to and/or use of personal information to what is required to provide their services and to comply with our privacy requirements.

#### B. Third Parties

In the course of providing certain of our programs, products and services, we may do so through arrangements with third parties. As a result, your personal information may be collected, used and shared by us and the applicable third party. These third parties may have their own privacy policies and terms and conditions, which will govern their use of your personal information. You should review the relevant privacy policies that apply when providing them with your information. For example, if you share your details on an Internet Listing Services (ILS) platform, we have no control over their information-handling practices.

#### C. Sale or Transfer of Business or Other Transaction

We may decide to sell or transfer all or part of our business to a related company or to a third party, to merge with another entity, to insure or securitize our assets, or to engage in another form of corporate or financing transaction (including the proceedings of insolvency or bankruptcy), corporate reorganization, share sale, or other change in corporate control. If your personal information is required in connection with any such business transactions, we will comply with the legal requirements for the disclosure of personal information.

#### D. Other Permitted Reasons

Canadian law permits or requires the use, sharing, or disclosure of personal information without consent in specific circumstances. These circumstances include situations where use, sharing, or disclosure is necessary to protect G & E Construction, our employees, our customers, or others (e.g., when investigating and preventing suspected or actual illegal activities, including fraud, or to assist government and law enforcement agencies). If this happens, we will not share more personal information than is reasonably required to fulfill that particular purpose.

#### E. With your Consent

Other than the purposes listed above, we may, with your implied or express consent, share or disclose your personal information outside of our group of companies, in accordance with



applicable law.

## **5.0 How Do We Manage Consent?**

Unless otherwise permitted or required by law, G & E Construction shall not use or disclose personal information for any new purpose that is not outlined in this Notice without first identifying and documenting the new purpose and obtaining the consent of the individual. In some cases, your consent may be “implied” i.e. your permission is assumed based on your action or inaction at the point of collection, use or sharing of your personal information.

An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. For example, you are always given the ability to opt-out of receiving promotional electronic messages from G & E Construction by using the available “unsubscribe” link. G & E Construction will inform customers of the implications of withdrawing consent, as we may be limited or unable to provide information, products or services as a result.

We will obtain consent when we want to use personal information for a new purpose or for a purpose other than those stated at the time of collection in this Notice or in the terms and conditions of a specific program, product, service, promotion or event you signed up for, participated in or purchased.

Your consent can be withdrawn at any time, except in limited circumstances, including where withdrawal of consent is restricted by legal or regulatory requirements or as a result of your contractual obligations with us.

*For example:* To apply for financing for your new home, you are required to provide consent on your application to the ongoing collection, use and sharing of your personal information to allow us to obtain and update credit reports and other credit history information about you from time to time with credit bureau agencies and other entities that support the credit reporting system. Your consent for these purposes cannot be withdrawn during the time you have credit with us and for a reasonable period afterwards.

If you choose not to provide us with certain personal information or if you withdraw your consent, where such withdrawal is available, we may not be able to offer you the programs, products, services, promotions, events or information that you requested or that could be offered to you.

## **6.0 How Do I Change My Privacy Choices?**

We want you to clearly understand your choices and make informed decisions about your privacy options. There are several options available for you to manage your privacy preferences, including, for example: contacting us directly; changing your browser settings on your device; and/or, where available, using third party unsubscribe functionality.

### **A. When you Register or By Contacting Us Directly**

You may opt-in to receiving email or SMS marketing communications at the time that you register for our programs, products, or services, enter our promotions or any time thereafter when you interact with us. You may opt-out of:

- Receiving email or SMS marketing communications from the sender, by clicking “unsubscribe” within any marketing email you receive or texting “STOP” within any SMS

marketing you receive;

- Receiving surveys by following the unsubscribe instructions provided in the email; or
- Receiving interest-based advertisements or other communications from us.

Please note that even if you have opted out of receiving marketing communications from us, we may still contact you for transactional purposes, in compliance with applicable laws (e.g. for customer service, pertinent information about your property or service or reminder notices). We may also need to contact you with questions or information regarding your contract with G & E Construction.

It may take some time for all of our records to reflect changes in your preferences (e.g., if you request that you not receive personalized marketing communications from G & E Construction, your preference may not be captured for a promotion already in progress).

#### B. Changing your Browser Settings on your Device

We use technologies to enhance your customer experience and present offers to you. For example, technologies such as cookies allow us to recognize when you use or return to our websites, providing you with a more seamless experience. You may delete or disable certain of these technologies at any time via your browser. However, if you do so, you may not be able to use some of the features of our websites.

Please refer to your browser instructions or help screen to learn more about how to block, delete and manage cookies on your computer or mobile device.

#### C. Using Third Party Unsubscribe Functionality

You can manage your privacy preferences with respect to certain third parties, such as RentCafe, by using the unsubscribe functionality within their platforms. Any interest-based advertising you receive from one of G & E Construction's partners can also be opted out of from their specific platforms. We also may embed links to other sites, including social media websites, on our websites. For more information about social media plug-in protocols, such as "Like" buttons on Twitter, Facebook or Instagram and their impact on your privacy rights, please visit the appropriate social media help centre (e.g., Facebook's Help Center at <https://www.facebook.com/help/>).

### **7.0 How Do We Protect and Store Personal Information?**

We take the security of your personal information very seriously and are committed to protecting your privacy by using a combination of administrative, physical, and technical safeguards. These measures include multi-factor authentication, masking, encryption, logging and monitoring, as described below. We store your personal information for as long as it is necessary to provide you with our programs, products, and services and for a reasonable time thereafter, or as permitted or required by law.

#### A. How We Protect Your Personal Information

To protect your personal information, we maintain administrative, technical, and physical safeguards in our properties, offices, and information storage facilities. By implementing these safeguards, we aim to avoid the loss, misuse, unauthorized access, disclosure, or modification of

your personal information that we hold. These safeguards also apply when we dispose of or destroy your personal information.

Examples of safeguards we may use, where appropriate, include but are not limited to:

Multi-Factor Authentication, which is a method of confirming your identity by using more than one way to authenticate you, such as asking for your password and a code that is sent to your email address or phone number;

Masking, which is the process of obscuring your information so that the structure remains the same, but the content is no longer identifiable; De-identification, including pseudonymization techniques that replace, remove or transform your information with a pseudonym (e.g., replacing identifiers with codes) to preserve its informational value;

Anonymization, which is the process of altering your data so that it can no longer be used to identify you personally;

Encryption, which is the process of obscuring your information in order to make it unreadable without the use of a code or a key;

Logging and monitoring, which is the process of tracking, recording, and monitoring activity related to the access and/or use of your personal information; and

For paper records, security card access to premises, locked cabinets and secure shredding practices are all enforced.

## B. Data Governance

We maintain policies and practices which ensure the protection of your personal information. Depending on the volume and sensitivity of the information, the purposes for which it is used and the format in which it is stored, we implement a combination of measures to protect your personal information, including:

- Internal policies and procedures that govern our privacy and information handling practices, including responding to privacy complaints or inquiries, investigating potential incidents and records management;
- Regular employee privacy and security training;
- Contractual protections and other measures to ensure that service providers with whom we share personal information maintain adequate privacy protections and standards, as described above and in How Do We Share Personal Information?; and
- Regular review of privacy compliance initiatives.

## C. Where we Keep Personal Information

We use all reasonable safeguards, including contractual requirements with our service providers, to protect your personal information wherever it is used or stored. In general, we store, access, and use personal information in Canada. Some of our service providers may access, process, or store your personal information outside of your province or Canada in the course of providing their services to us. When we engage a service provider that operates outside of your province or Canada, personal information may be stored, processed, accessed, or used in a foreign

jurisdiction. In that case, the personal information is subject to the law of the jurisdiction in which it is used or stored, including any law permitting or requiring disclosure of the information to the government, government agencies, courts, and law enforcement in that jurisdiction. The jurisdictions where our service providers are currently located include Canada, the United States, and UK.

#### D. How Long We Keep Personal Information

We will store your personal information for as long as necessary to fulfill the purposes for which it was collected, except where otherwise required or permitted by law. Once no longer required, your personal information will be securely destroyed or anonymized (so the information no longer identifies you).

Please note that if your personal information is collected by a third party, it will be retained in accordance with the privacy policies and records retention requirements of that third party.

### **8.0 What Are Your Rights in Relation to Your Personal Information?**

Under Canadian privacy law, you have the right to request access to, correction, and deletion of the personal information we hold about you, or make a complaint, subject to any legal restrictions. We will respond to your request within a reasonable timeframe, in compliance with applicable laws.

You can request access or correction, deletion, request a review of certain automated decisions, or make a privacy complaint, through email or postal address.

### **9.0 How Do I Know If There Are Changes to the Privacy Notice?**

We may make changes to this Notice from time to time. Any changes we make will become effective when we post a modified version of the Notice on this webpage. If we make any material changes to the policy, we will post a notice on our websites or notify you directly. By continuing to participate in our programs, and/or use our services or purchase our products after being notified of such changes, you are accepting the changes to the Notice, subject to any additional requirements which may apply. If you do not agree to the changes in our Notice, it is your responsibility to stop participating in our programs and contact G & E Construction. It is your obligation to ensure that you read, understand, and agree to the latest version of this Privacy Notice. The “Effective Date” at the top of this page indicates when it was last updated.

### **10.0 Who Do I Contact with Privacy Questions?**

We have appointed a dedicated Privacy Officer who is responsible for overseeing our privacy program and ensuring compliance with applicable privacy laws and regulations. If you have any questions about how we handle your personal information, please contact us. If you are using a tool or service, or are participating in an event that is offered by us with a third party, the third party may hold your personal information. If you have any questions or concerns, we will direct you to the appropriate party so that you may make enquiries as to that party’s privacy policies and practices.



For all privacy related questions, contact:

G & E Construction  
787 Principale St  
Casselman, ON  
K0A 1M0

[philippe@gerenoconstruction.com](mailto:philippe@gerenoconstruction.com)

---

#### REVISIONS TO THIS POLICY

We reserve the right to modify this Privacy Policy at any time. Revisions will be effective when posted on G & E Construction's websites.