

### OVERVIEW

Dream Asset Management Corp., Dream Office REIT, Dream Industrial REIT, Dream Global REIT, Dream Hard Asset Alternatives Trust and their respective affiliates and subsidiaries (collectively, “Dream”) are committed to maintaining the accuracy, security and privacy of the personal information of all individuals whom Dream deals with, in accordance with Canada’s privacy legislation, the Personal Information Protection and Electronic Documents Act (PIPEDA). This Privacy Policy is a statement of principles and guidelines for the protection of the personal information that Dream collects, uses or discloses in the conduct of business. The Privacy Policy applies to all of Dream’s customers and potential customers, employees current, past, part time and full time (including, without limitation, Trustees, Officers, Individual Consultants, Contractors, Agents, and Co-op Students).

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#### **i) Definition of Personal Information**

Personal information means information about an identifiable individual, but does not include the name, title or business address, or telephone number of an employee of an organization.<sup>1</sup> This definition applies to Dream’s employees and to the personal information Dream collects, uses or discloses in the course of commercial activities.<sup>2</sup>

#### **ii) Privacy Policy Principles and Guidelines**

##### *Principle 1 - Accountability*

Dream is responsible for personal information under its control. Dream has designated a Chief Compliance Officer to be accountable for the organization’s personal information handling policies and practices, including but not limited to the Ten Principles and Guidelines.

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<sup>1</sup> [https://www.priv.gc.ca/leg\\_c/interpretations\\_02\\_e.asp](https://www.priv.gc.ca/leg_c/interpretations_02_e.asp)

<sup>2</sup> [https://www.priv.gc.ca/leg\\_c/interpretations\\_02\\_e.asp](https://www.priv.gc.ca/leg_c/interpretations_02_e.asp)



## Dream Privacy Policy

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

Dream commits to identify why it is collecting personal information at or before the time of collection. Dream will notify customers and employees before using personal information for any purpose not identified at the time of collection.

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

The knowledge and consent of an individual is required for the collection, use, or disclosure of personal information, except where inappropriate or as permitted by law. In obtaining consent, Dream uses reasonable efforts to ensure that an individual is advised of the purpose for which the personal information will be used or disclosed. An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Dream will advise the individual of the implications of such withdrawal.

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

Dream limits the collection of personal information to what is necessary for identified purposes and information is collected by fair and lawful means.

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

Dream does not use or disclose personal information for purposes other than the identified purposes for which it is collected, except with the consent of the individual or as required or permitted by law. Dream retains personal information only as long as is necessary to fulfill the identified purposes. Employee information is retained for seven years with the exception of pension information, which is retained indefinitely, after the termination of employment. Dream destroys, erases or makes anonymous personal information that is no longer required to fulfill the identified purposes, in a manner that continues to maintain your privacy.

### *Principle 6 - Accuracy of Personal Information*

Personal information held by Dream is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used. Dream updates personal information about individuals as and when necessary to fulfill the identified purposes or upon notification by the subject individual. Dream does not routinely update personal information, unless such process is necessary to fulfill the identified purposes.

### *Principle 7 - Security Safeguards*

Dream protects personal information by security safeguards appropriate to the sensitivity of the information. Dream uses reasonable efforts and security measures to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, modification, disposal or destruction. Dream operates secure data networks protected by industry standard firewall and password protection systems. Dream protects personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the limited purposes for which it is to be used.



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### *Principle 8 - Openness Concerning Policies and Practices*

Dream makes its Privacy policies and practices readily available through the DNN (company intranet) and through Dream's websites.

### *Principle 9 - Individual Access to Personal Information*

Upon written request from an individual, pursuant to Principle 8 - Openness Concerning Policies and Practices, Dream will inform the individual of the existence, use, and disclosure of his or her personal information and, subject to certain exceptions, will give the individual access to that information. If access is denied, Dream will notify the requesting individual in writing, give reasons for the denial, and inform the individual of the recourses open to him or her. If access is granted, Dream will give the requesting individual a reasonable opportunity to review the personal information collected by Dream.

### *Principle 10 - Challenging Compliance*

Individuals may address a challenge concerning compliance to Dream's Chief Privacy Officer. See Contact information below.

### **iii) Collection and usage of personal information**

We collect, use and disclose your personal information for the following purposes:

Recruitment for positions with Dream and its affiliates, including for the purpose of obtaining and providing references regarding personnel;

Establishing, managing and terminating relationships with personnel, and assessing and facilitating the implementation of programs, policies, procedures and opportunities for personnel;

Administration of Dream's policies and procedures regarding the training, retention, performance, evaluation, discipline and termination of personnel;

Administration of compensation, benefits, travel, rewards, company vehicles and vehicle allowances, advances, loans, garnishments, and other personnel services and fulfilling taxation and other legal requirements in respect of same;

Complying with other requirements imposed by law, including without limitation, collecting personal information required by applicable workplace insurance and safety legislation and occupational health and safety legislation;

Administering the physical and technological security of Dream's facilities and technology systems, and the safety of personnel and visitors, through the collection of personal information on security video, access-card access and other security surveillance systems, in accordance with Dream's policies;



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Detecting and protecting Dream and other third parties against error, negligence, breach of contract, theft, fraud and other illegal activity, and to comply with Dream audit requirements, and to audit compliance with Dream's policies, procedures, laws and contractual obligations;

Administration of Dream's Intranet, website and computer systems, including remote access from home or other non-Dream locations;

Providing computer system help desk services and technical support for personnel and ensuring that computer system, email, Intranet and Internet use by personnel complies with Dream's technology policies and applicable laws;

Marketing and promotion of Dream, including the use of personnel photographs and biographies on the Intranet, Internet, website and in responses to requests for proposals, brochures, announcements, advertising and other marketing, promotional and informational materials;

To promote the social interaction of personnel, including: organized events, contests, rebate programs, and to celebrate birthdays and holidays;

To engage in and carry out business transactions that may involve the sale or transfer of personal information, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving Dream or its affiliates; as permitted by and to comply with any legal or regulatory requirements and laws; and for any other purpose to which an individual consents

### **iv) Changes to the Personnel Privacy Policy**

Dream reserves the right to modify or supplement this Privacy Policy at any time. If we make any change to this Privacy Policy, we will post such changes on the company's internal website, Dream Network News (DNN), and will be available upon request from the Chief Privacy Officer.

### **v) Accessing Personal Information**

Employees have a right to access personal information that Dream has and to know how it is used, subject to certain legal exceptions. To submit a request to access your personal information, please contact the Chief Privacy Officer.

### **vi) Contact**

Should you have any questions or concerns about this policy or the procedures please contact the Chief Privacy Officer, Steven Grant, Director, Controls & Compliance at [sgrant@dream.ca](mailto:sgrant@dream.ca) and at 416-365-6562