

Privacy Policy of Borealis Services-Conseils inc.

Borealis Advisory Services

Effective Date : June 26, 2025

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At **Borealis Services-Conseils inc.** ("**Borealis**"), we recognize the importance of protecting the personal information you entrust to us. This policy aims to transparently explain how we collect, use, retain, disclose, and safeguard your personal information in accordance with the *Personal Information Protection and Electronic Documents Act* (S.C. 2000, c. 5) and the ethical rules and professional practice standards applicable to members of the Ordre des Évaluateurs Agréés du Québec (OEAQ).

As a private firm providing professional real estate valuation and advisory services to the commercial real estate industry in Quebec, we collect, use, and disclose information daily to deliver our advisory, litigation, and transactional services. Confidentiality is fundamental to us, and professional secrecy is a cornerstone of our client relationships. We adhere to the highest ethical standards when handling all information, especially personal information.

This Privacy Policy is intended to help you understand our practices regarding the collection, use, disclosure, and retention of personal information. By providing us with personal information (via our website, secure portal, client portal, email, in person, or by phone), you agree that your information will be processed in accordance with this Privacy Policy and authorize **Borealis**, its third parties, and service providers to process your personal information for the purposes described below.

This Privacy Policy does not apply to third-party websites accessible via hyperlinks on our website. **Borealis** assumes no responsibility for the privacy practices of such external sites. If you follow a link to a third-party site, it will have its own privacy policies, which you should review before submitting any personal information.

Who we are and what we do

Borealis Services-Conseils is a private firm providing professional real estate valuation and advisory services for all purposes to the commercial real estate industry in Quebec. Our professionals are designated Chartered Appraisers (C. App.), all governed by the *Ordre des Évaluateurs Agréés du Québec* (OEAQ), with several decades of combined professional experience.

1. Scope of the Policy

This policy applies to all professional and advisory services offered by **Borealis** in the context of its real estate valuation and related advisory activities, regardless of whether information is collected in person, by phone, email, via our website, or by any other means of communication.

Unless otherwise stated, **Borealis** is the “**data controller**” of your personal information, meaning we determine the purposes and means of processing that information.

2. Definition of Personal Information

“**Personal information**” means any information about an identifiable individual, including but not limited to: name, address, telephone number, email address, financial data, property-related information, legal documents, or any other data that can identify a natural person.

3. Collection of Personal Information

We collect only the personal information necessary to deliver our professional services. This includes, without limitation:

- Information to identify our clients or their representatives (e.g., name, title, professional contact details);
- Information required to carry out any kind of real estate valuation mandate (e.g., notarial deeds, leases, financial statements, plans, environmental reports, etc.);
- Any information voluntarily provided in the context of a mandate or service request;
- Information may be collected directly from you or authorized third parties, where necessary and with your consent.

4. Use of Personal Information

The personal information collected by **Borealis** is used strictly for the following purposes:

- To provide any kind of real estate valuation and advisory services in accordance with the mandate received;
- To communicate with you regarding our services;
- To comply with our legal, regulatory, and ethical obligations, including those imposed by the *Ordre des Évaluateurs Agréés du Québec* (OEAQ);
- To improve the quality of our services;
- To produce analyses or statistical reports for professional purposes, where data is aggregated and anonymized so that no individual can be identified directly or indirectly.

5. Consent, Collection and Use of Personal Information

We collect, use, and disclose your personal information only with your informed consent, except if it were permitted or required by law. Consent may be explicit (written, verbal, or electronic) or implied under appropriate circumstances.

Borealis collects, uses, or discloses personal information only with the informed consent of the individual concerned, unless required by law or when necessary to deliver the requested professional services or conduct our business in compliance with our professional obligations.

Personal information is used only for the purposes for which it was collected and retained only as long as necessary to fulfill those purposes or to meet **Borealis'** legal and ethical obligations.

6. Disclosure to Third Parties

Your personal information may be disclosed to third parties in the following cases:

- When required to execute a professional mandate or deliver a real estate valuation report for any purpose;
- When required or permitted by law;
- With your prior consent;
- To our service providers (e.g., IT or secure archiving services) who are contractually bound to maintain confidentiality.

Your information will never be sold, rented, or exchanged for commercial purposes.

7. Retention and Destruction of Information

We retain your personal information for as long as necessary to fulfill the mandate and to meet our professional, legal, and tax obligations. Once this period has elapsed, the information is securely destroyed or anonymized.

8. Safeguarding Information

We implement reasonable administrative, technical, and physical safeguards to protect your personal information from loss, theft, unauthorized access, disclosure, or modification. These measures include, among others:

- Limiting access to authorized employees and professionals only;
- Secure storage of documents;
- Use of password-protected and firewall-secured IT systems;
- Staff training in confidentiality and data protection.

9. Access and Rectification

You have the right to access your personal information and request corrections if it is inaccurate or incomplete. To do this right, please contact our Privacy Officer (see Section 11 below).

10. Accountability and Oversight

Borealis is responsible for the personal information it holds. We have appointed a Privacy Officer to ensure compliance with this policy and to respond to your inquiries or complaints.

11. Internal Responsibilities Regarding Personal Information

All **Borealis** personnel are required to comply with this Privacy Policy and the applicable laws and regulations in Canada and the province of Québec.

Any situation that may constitute a breach of privacy or data security must be reported without delay to the immediate supervisor or the Privacy Officer designated by **Borealis**.

Borealis will investigate all reported concerns and take appropriate corrective action, which may include internal disciplinary measures, up to and including termination of employment. Legal recourse may also be pursued if warranted.

Protecting personal information is integral to our professional culture, ethics, and commitment to client excellence.

12. Contact Information for the Privacy Officer

Name: Jean-Bernard Parenteau
Title: Managing Partner and Privacy Officer
Email: jb.parenteau@borealisexpert.ca

13. Changes to the Policy

This policy may be updated periodically to reflect legislative or organizational changes. Any significant changes will be communicated via our website or directly to our clients.

14. Questions or Complaints

If you have any concerns or questions about the handling of your personal information, please contact our Privacy Officer using the above contact information. Any complaint will be handled promptly, thoroughly, and confidentially.