

# OMERS Private Markets Privacy Statement

LEGAL



Camille Glover  
cglover@borealis.ca



Effective  
November 1, 2014

## OUR COMMITMENT TO YOUR PRIVACY

At OMERS Private Markets, we are committed to preserving the privacy of your personal information. This Privacy Statement sets out the details of this commitment.

The way in which we collect, use and disclose personal information may change from time to time, and we reserve the right to change or clarify our Privacy Statement. You can review our Privacy Statement by visiting our website or requesting a copy from our Privacy Officer.

**This Privacy Statement applies to all operations within Borealis Infrastructure and OMERS Private Equity, but does not apply to the personal information of OMERS Private Markets' employees, prospective employees or contractors.**

## What is personal information?

Personal information is any information that identifies a person, that could reasonably be used to identify a person, or that is about an identifiable person.

Personal information we collect can include non-sensitive information, such as your name, contact information, and demographic information, or more sensitive personal information, such as your income and credit history.

## How is my privacy promoted?

Under the guidance of our Privacy Officer, OMERS Private Markets promotes compliance with privacy laws and internal policies and procedures.

We have established processes for identifying potential privacy breaches and providing appropriate notification of any breaches in order to maintain accountability to the owners of all personal information in our possession and control.

## Why is my personal information collected?

Reasons we collect your personal information include the following purposes (the "identified purposes"):



*Promoting your privacy is important to us.*



*Underlying our commitment to privacy is the protection of personal information – information about you or that can identify you.*

- evaluating, establishing and maintaining commercial relationships and fulfilling contractual obligations
- facilitating business transactions, including evaluating, effecting, monitoring and managing investments
- maintaining appropriate business records, and generally managing and administering our business
- researching, developing, managing, protecting and improving our services
- investigating and settling claims
- tracking website usage, transaction history and patterns
- investigating specific transactions or patterns of transactions to detect unauthorized or illegal activities
- responding to inquiries
- facilitating safety and security
- performing functions required or authorized by law
- for any other purpose to which you consent

We only collect and use your personal information as reasonably necessary for the identified purposes.

### Is consent needed for collection, use and disclosure of my personal information?

Depending on the jurisdiction, privacy laws may require your knowledge and consent prior to our collection, use and disclosure of your personal information. Where consent is required, your consent can be expressly provided or implied where it is reasonable in the circumstances.

Subject to legal requirements, your consent can be refused or withdrawn for OMERS Private Markets' collection, use or disclosure of your personal information by notifying our Privacy Officer in writing.

The following are examples of consent, collection, use and disclosure:

#### Information You Provide To Us:

When you directly disclose personal information to OMERS Private Markets or to our service providers and agents, you are consenting to our collection, use and disclosure of your personal information in order to fulfill the identified purposes. This may include the sharing of information with our service providers (for example, financial institutions, actuaries, consultants, auditors, legal advisors, etc.).

We may verify your personal information, or obtain additional personal information about you by checking with credit bureaus and other fact-collecting and verifying entities to assist us in the identified purposes.

If you provide us, our service providers, or our agents with personal information about another person, you represent that you have all necessary authority and/or have obtained all necessary consents from that individual to enable us to collect, use and disclose that personal information.

#### Business Transactions:

Where reasonably necessary for business transactions, we may collect your personal information from, or disclose your personal information to third parties. This may include background checks (including criminal and credit checks), proposed or actual



*The type of personal information we collect about you and the reason for the collection will depend on your interaction with us.*



*Your consent can be express or implied where it is reasonable in the circumstances.*



*Where reasonable in the circumstances, we imply your consent for business transactions.*

purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance, financing or investment. In these cases, consent is implied, unless express consent is legally required.

#### **Website:**

Use of our website is subject to our policies and procedures. By using our website, you are providing us with consent to collect, use and disclose any information that may be provided to us through its use.

Through our website, we may place a text file called a “cookie” in the browser directory of your computer’s hard drive. A cookie is a small piece of information that a website can store on a web browser and later retrieve. The cookie cannot be read by any website other than the one that set up the cookie. Most browsers can be set to reject all cookies. If you choose to modify your browser in this manner, some pages of our website may not function optimally and you may not be able to use all features of our website in the future.

Our website sometimes provides links to websites that are operated by third parties not under our control. This Privacy Statement does not describe the privacy policies of any third party websites or their privacy practices. OMERS Private Markets is not responsible for how such third parties collect, use or disclose your personal information, so it is important to familiarize yourself with their privacy policies before providing them with your personal information.

#### **Video Surveillance:**

For safety and security reasons, we may use video surveillance technologies at our properties to monitor public access areas of those properties (for example, parking lots, entrances, and lobby areas) as well as internal meeting rooms and offices. By entering our premises, you are consenting to the use of your personal information for these purposes. For questions about our use of video surveillance at our properties, please contact our Privacy Officer.



*For security purposes, we use video surveillance on our properties.*

#### **Regulated Disclosures:**

Where permitted by the law, we may disclose your personal information to government agencies in accordance with their statutory authority.

#### **Where is my personal information stored?**

Usually your personal information is stored in the jurisdiction in which it was collected. However, OMERS Private Markets or our service providers and agents may store or access your personal information outside of the jurisdiction in which it has previously been collected, used or disclosed. For example, personal information collected in Ontario may be transferred outside of Ontario and/or Canada. Similarly, personal information collected within the European Economic Area (EEA) may be transferred to, and stored at, a destination within or outside of that area. When such transfer takes place, it may also be processed by staff operating outside of the jurisdiction who work for us or for one of our service providers.



*Your personal information may be stored in, transferred to, and accessed from, a variety of jurisdictions.*

By providing your personal information to us, you agree to the transfer and storage of your personal information, and accept that your personal information may be subject to the laws of those other jurisdictions, and in certain circumstances that the courts, law enforcement agencies, regulatory agencies or security authorities in those other jurisdictions may be entitled to access your personal information.

## How is my personal information kept safe?

Whether in electronic or paper-based format, we endeavour to safeguard your personal information from loss, theft and unauthorized access, use or disclosure. These include secure servers and firewalls. Physical access to those areas where information is gathered, processed or stored is restricted to authorized employees. Controls are in place over computer systems and data processing procedures and these controls are reviewed on an ongoing basis to ensure compliance with our security and privacy requirements.

We require our service providers and agents to protect personal information collected by them on our behalf, or disclosed to them by us.



*We use a variety of mechanisms – including physical, technological, and organizational ones – to help keep your personal information secure.*

## How can I access or correct my personal information?

In most cases, we collect personal information in the course of business transactions. We rely on the parties providing the information to us to ensure that the personal information we collect about you is accurate, complete and up-to-date. In other cases, we rely on you to provide accurate information, and to notify us when there is a change in your personal information. We will not routinely update your personal information and will only do so when such updates are necessary to fulfill the identified purposes. As such, in certain circumstances we may verify personal information, or obtain additional personal information through third parties.

Where you provide us your personal information for a particular matter, or believe the personal information we have about you is inaccurate, you have a right, subject to certain exceptions, to access and correct your personal information in our possession or control.

You may access and correct your personal information by writing or emailing our Privacy Officer as described below. There may be an administrative charge for retrieving this information.



*We rely on you to help us keep our records accurate, but may occasionally seek external verification.*



*You can access your personal information by making a written request to our Privacy Officer.*

## Who can I contact with questions or concerns?

If you have any comments or questions about our Privacy Statement, or if you believe that we have not complied with our Privacy Statement, please contact our Privacy Officer.

Our Privacy Officer can be contacted as follows:

Camille Glover  
 Privacy Officer  
 Royal Bank Plaza  
 South Tower, Suite 2100  
 200 Bay Street  
 Toronto, ON M5J 2J2

e-mail: [cglover@borealis.ca](mailto:cglover@borealis.ca)



*Our Privacy Officer is ready to respond to your questions and concerns.*