

PRIVACY POLICY

460 HOLDINGS INC. PRIVACY POLICY

1. Introduction and Effect

This Privacy Policy describes the practices of 460 Holdings Inc. and its affiliates and subsidiaries, including 460 Realty Inc., and 460 Property Management Inc. (“**460**”, “**we**”, “**us**” and “**our**”) with respect to our collection, use, storage and disclosure of personal information, including personal information provided to us by employees, customers and users of 460realty.com, 460pm.com or such other websites made available by 460 from time to time, as described more fully below (the “**Websites**”). The policy also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

This policy has been developed in compliance with British Columbia’s **Personal Information Protection Act** and the federal **Personal Information Protection and Electronic Documents Act**, and the regulations promulgated thereunder (the “**Privacy Legislation**”), which sets out rules regarding how organizations such as 460 can collect, use and disclose personal information.

For the purposes of this policy, “personal information” is information about an identifiable individual, such as (but not limited to) name, home address, telephone number, social insurance number, sex, income and family status. Personal information does not include information that would enable an individual to be contacted at a place of business (for example, an employee’s name, position or title, business telephone number, or business address) or any information exempted by the Privacy Legislation. We will only collect, use or disclose personal information in accordance with this policy or in accordance with the Privacy Legislation.

This Privacy Policy was last updated on **November 8, 2013**. We may change this Privacy Policy from time to time in order to update it with our current business practices as well as to accommodate changes in Privacy Legislation. When we do so, we will post the newest version of this Privacy Policy on our Websites. Policy changes will apply to the information collected from the date of the revised Policy as well as to existing information held by us, subject always to the Privacy Legislation.

2. 460 Values

460 respects and upholds an individual’s right to privacy and to protection of his or her personal information. We know how important it is to protect your personal information. In keeping with that goal, we have developed this policy to explain our practices for the collection, use and disclosure of your personal information.

3. Collection and Use

We collect two types of information through our communications with customers, contractors and contacts: personal information and non-personal information, depending on the nature of your interaction with us. We may collect the following personal information from you:

- (a) Contact information such as name, email address, mailing address, phone number.
- (b) Billing information such as credit card number, banking information and billing address.
- (c) Unique identifiers such as user name, account number, password.

As is true of most businesses with websites, we may also automatically gather non-personal information about your computer such as your Internet Protocol (IP) address, browser type, referring/exit pages, and operating system, and may collect your phone number or other personal information through caller ID, return addresses, or other materials or contacts you make with us.

From employees and independent contractors, we may collect the following personal information: (1) contact information such as name, home address, phone number; (2) financial information such as bank account number; and (3) emergency contact information, together with the information needed to maintain the employment relationship.

4. Use of Personal Information

(a) Examples of Uses

- (i) We may use your personal information, in combination with your non-personal information, for a variety of business purposes, for example:
 - a. To fulfil your requests (such as, for example, if you are utilizing our real estate brokerage services, to solicit offers to buy or sell real estate; or, if you are utilizing our property management services, to administer the contracted properties).
 - b. To send you confirmations.
 - c. To assess your needs, or the needs of your business, to determine suitable products or services.
 - d. To send you requested product or service information.
 - e. To respond to customer service requests.
 - f. To administer your account with us.
 - g. To send you a newsletter or other marketing communications.
 - h. To respond to your questions and concerns.
 - i. To improve our Websites and marketing efforts.
 - j. To conduct research and analysis; and
 - k. For other purposes as described in this policy.

- (ii) In addition, for our employees and contractors, we collect and use personal information for the following purposes:
 - a. To administer compensation, benefits, and pension programs.
 - b. To comply with legal and regulatory requirements.
 - c. To protect and manage corporate assets.
 - d. To provide security measures.
 - e. To otherwise establish and manage the working relationship and to plan and manage 460's workload and business activities.

(b) General Use

Some of our uses of personal information (see "Disclosure of Personal Information" below, as well) may result in personal information collected by us being stored or processed in other jurisdictions such as the United States, and, as a result, your personal information may be accessible to law enforcement and regulatory authorities in accordance with applicable laws of other jurisdictions.

5. Consent

We will collect, use, or disclose your personal information only with your knowledge and consent, except where required or permitted by the Privacy Legislation. When you choose to provide us with your personal

information, you consent to the use of your personal information as identified in this policy and as may be further identified at the time of collection.

(a) Express Consent

Sometimes you will be asked to give your express consent to our collection, use or disclosure of personal information – for example, by being asked to check a box to indicate your consent.

(b) Implied Consent

Other times, you may provide your implied consent to our collection, use or disclosure of personal information when we can reasonably conclude that you have given consent by some action you have taken or an action you have decided not to take. Generally, this occurs where the purpose for the use of your personal information would be reasonably apparent to you – for example, when you provide us with personal information through forms when contacting us through our Websites, you provide us with implied consent to use that information to contact you.

The acceptance of employment or an independent contractor relationship by an employee or contractor is viewed as implicit consent for 460 to collect, use and disclose personal information about the people involved therein for the purposes identified above and to maintain and administer such relationship.

(c) Withdrawing Your Consent

Subject to applicable Privacy Legislation, you may notify us at any time that you wish to withdraw or change your consent to our use and disclosure of your personal information. We will accommodate your request subject to legal and contractual restrictions.

If you have “opted in” or subscribed to one of our mailing lists, we will always provide you the opportunity to “opt out” or unsubscribe. For example, if you receive emails from us, we will provide a link in the email which you can use to unsubscribe from that mailing list, or you may contact our Privacy Officer (see contact information below).

You may choose not to provide us with your personal information. However, if you make this choice, we may not be able to provide you with the service or information that you requested.

(d) Consent Not Required

The **Personal Information Protection Act** allows 460 to collect, use or disclose employee personal information without consent if it is reasonable for the purposes of establishing, managing or terminating an employment relationship between 460 and an employee. Employee personal information may include name, home address, educational history and employment history. The **Personal Information Protection Act** requires 460 to notify an employee before collecting employee information and to identify the purpose for collecting it.

(e) Information Obtained from or about Third Parties

If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

6. Disclosure of Personal Information

We will share your personal information with third parties only in the ways that are described in this policy. We will not sell your personal information to third parties.

We may provide your personal information to companies that provide services to help us with our business activities such as our independently contracted real estate agents, our payment processors or other service providers, or customer service agencies. These companies are authorized to use your personal information only as necessary to provide these services to us, and in a manner consistent with this policy.

We may also disclose your personal information:

- (a) As required by law such as to comply with a subpoena, or similar legal process.
- (b) When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.
- (c) If 460 is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Websites of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.
- (d) To any other third party with your prior consent to do so.

7. Information We Collect Automatically on Our Websites

In some cases, we automatically collect certain information from our Websites.

(a) Our Websites

When using our Websites, we may collect the IP address of your computer, the IP address of your Internet Service Provider, the date and time you access our Websites, the Internet address of the website from which you linked directly to our Websites, the operating system you are using, the sections of our Websites you visit, the Websites' pages read and images viewed, and the content you downloaded from the Websites. This information is used for the Websites and system administration purposes, and to improve the Websites.

(b) Cookies

Our websites may use "cookies", a technology that installs a small amount of information on a user's computer to permit the Websites to recognize future visits using that computer. Cookies enhance the convenience and use of the Websites and 460's products. For example, the information provided through cookies is used to recognize you as a previous user of the Websites, to offer personalized content and information for your use, to track your activity at the Websites, to respond to your needs, and to otherwise facilitate your Websites experience. You may choose to decline cookies if your browser permits, but doing so may affect your use of the Websites and your ability to access certain features of the Websites or engage in transactions through the Websites.

(c) Links to Other Websites

Our Websites may contain links to other websites or Internet resources that are provided solely for your convenience and information. When you click on one of those links, you are contacting another website or Internet resource. We have no responsibility or liability for, or control over, those other websites or Internet resources or their collection, use and disclosure of your personal information. We encourage you to read the privacy policies of those other websites to learn how they collect and use your personal information.

8. Security of Personal Information

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us through our Websites, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Websites, you can contact our Privacy Officer (see contact information below).

More generally, 460 will make reasonable efforts to ensure that personal information is protected against such risks as loss, theft, unauthorized access, disclosure, copying, use, modification or destruction. Safeguards include physical, administrative and electronic security measures.

If personal information is disclosed to a third party in accordance with this policy, 460 will make reasonable efforts to ensure that the third party has appropriate security procedures in place for the protection of the personal information transferred to it.

We may use third-party service providers (for example, web hosting providers and/or payment processors) to manage one or more aspects of our business operations, including the processing or handling of personal information. When we do use an outside company, we use contractual or other appropriate means to ensure that personal information is used in a manner that is consistent with this policy. As stated above, information may be stored, accessed or used outside of Canada; see "General Use" under "Use of Personal Information" above.

9. Accuracy

460 will make reasonable efforts to ensure that personal information is as accurate, complete and current, as required for the purposes for which it was collected.

In some cases, 460 relies on employees to ensure that certain information about them, such as their home address and phone number, bank account information or emergency contact information, is current, complete and accurate.

10. Access

The Privacy Legislation allows any individual the right to access and/or request the correction of errors or omissions in his or her personal information that is in our custody or under our control. Our Privacy Officer will assist you with such an access request. This includes:

- (a) Identification of personal information under our custody or control.
- (b) Information about how personal information under our control may be or has been used by us.
- (c) The names of any individuals and organizations to which the individual's personal information has been disclosed.

We will respond to requests within the time allowed by the Privacy Legislation and will make every effort to respond as accurately and completely as possible. Any corrections made to personal information will be promptly sent to any organization it was disclosed to.

In certain exceptional circumstances, we may not be able to provide access to certain personal information we hold about an individual. If access cannot be provided, we will notify the individual making the request within 30 days, in writing, of the reasons for the refusal.

11. Storage and Removal of Your Information

We keep your personal information only as long as we need it for legitimate business purposes and to meet any legal requirements. Personal information used to make a decision that directly affects an individual will be kept for at least one year after such a decision. We have retention standards that meet these parameters. We destroy your information when it is no longer needed or required to be kept, or we remove your personally identifiable information to render it anonymous.

12. Updates or Changes to Policy

We may update this policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of a notice on the Websites prior to the change becoming effective. We encourage you to periodically review this policy for the latest information on our privacy practices.

13. Privacy Officer and Concerns or Questions

You can direct any questions or concerns regarding our compliance with this policy to our Privacy Officer by writing or emailing as follows:

Randy Forbes,
Privacy Officer
privacy.officer@460realty.com

If any individual is not satisfied with our Privacy Officer's response to their question or concern, they may be able to make a complaint under the Privacy Legislation. Our Privacy Officer can provide you with the contact information to make such a complaint.