



Privacy Policy

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1. Our Privacy Philosophy

At Tricon Residential Inc. (“**Tricon**”, “**we**” or “**us**”) we sincerely value the trust that you have placed in our business. We have adopted this privacy policy (the “**Policy**”) to explain how we maintain the accuracy, confidentiality, and security of personal information. Tricon has many affiliate entities located in different cities and countries, some of which are subject to different laws. This Policy will govern the operations of each Tricon affiliate unless and to the extent a Tricon affiliate has its own independent and separate policy governing personal information provided to you by such affiliate, in which case such independent policy shall govern. If and to the extent this Policy is to apply to one of Tricon’s affiliates, the terms “Tricon”, “we” and “us” will be deemed to include such affiliate.

This Policy explains how we collect, use, disclose and safeguard the personal information that you or a third party provide on our websites (each a “**Website**”), any of our apps, or through any other interaction with us (together, the “**Services**”). Providing personal information or authorizing a third party to disclose personal information to us signifies your consent to Tricon’s collection, use and disclosure of personal information in accordance with this Policy. If you provide personal information to us about a third party (for example, the name, address, and other information of an emergency contact) or authorize a third party to disclose personal information to us, you agree that you were authorized to do so.

Notwithstanding anything to the contrary herein, the meaning of “personal information” shall be interpreted in a manner that conforms with the minimum requirements of applicable privacy legislation.

2. Identifying Purposes and Obtaining Your Consent

Typically, the reasons Tricon collects and uses personal information are reasonably clear or can be reasonably anticipated when you provide the personal information to us. For example, and without limitation, at Tricon, we collect and use personal information so we can: (i) identify and communicate with you about matters relating to our properties and respond to your inquiries; (ii) establish eligibility for tenancy; (iii) assess your creditworthiness; (iv) process payments; (v) properly respond to emergency situations; (vi) ensure the orderly management of properties entrusted to our care; (vii) comply generally with privacy laws and all other applicable regulatory requirements; (viii) manage the common elements of our buildings or properties; (ix) assist you when you contact our customer support services, including to direct your questions to appropriate individuals, to investigate and address any of your concerns, and to improve and monitor our customer support responses; (x) ensure the safety, security and appropriate use of our properties; and (xi) communicate with you regarding investments you have made.

We may also use your personal information to provide you with information on upcoming opportunities, properties, products, services or opportunities we reasonably believe would be of interest to you.

We may use your personal information to communicate with you and to perform activities that are otherwise described in this Policy, as well as for those activities not described in this policy but which are permitted or required by law.

Should we require your information to fulfill a purpose that is not identified in this Policy or that is otherwise not permitted or required by law, we will obtain your consent before proceeding as required.

3. Categories and Types of Personal Information We Collect

We collect the following categories and types of personal information:

- **Contact Information:** your first and last name, home address and/or mailing address, past mailing address, email address, business phone number, cell phone number and emergency phone number;
- **Other identifying information:** social security/insurance number, official government documents, IP address, social media usernames, passwords and other security information for authentication and access;
- **Financial Information:** payment, banking and other financial history information;
- **Demographic information:** age, date of birth, household information, employment information and salary information;
- **Geolocation data;**
- **Internet or other electronic activity:** your browsing and click history, including information about how you navigate within our Services and which elements of our Services you use the most;
- **Commercial information:** properties viewed on our websites or through our Services
- **Preferences:** details that you provide to us about any special needs of residents and occupants, including disabilities and health concerns;
- **Inferences:** inferences drawn from the categories described above in order to create a profile about you to reflect your preferences, characteristics, behaviour and attitude; and
- **Video Surveillance Systems:** information collected through the use of video surveillance systems, which may be installed in the common areas or entrance areas of our buildings or properties or which may accompany technicians or service providers in the course of a service call.

4. How we Use Personal Information

We use your personal information for the following purposes:

- **Transactional Purposes:** We use your contact information, financial information, and commercial information to:
 - Establish your eligibility for tenancy;
 - Identify and communicate with you about matters related to our properties and investments you have made;
 - Assess your creditworthiness;

- Process payments; and
- Ensure the orderly management of properties entrusted to our care.
- **Analytical Purposes:** We use your internet activity and browsing history and geolocation data to analyze preferences, trends and statistics.
- **Marketing Purposes:** We use your contact information, commercial information, demographic information, internet or other electronic activity, and inferences to:
 - Inform you of our new properties, products, services, opportunities and offers;
 - Provide you with targeted advertising; and
 - Provide you other information from and about us, including personalized marketing communications.
- **Maintenance and Improvement of Services and Websites:** We use your contact information, commercial information, and internet activity and browsing history to:
 - Provide and maintain functionality on our Websites, including our live chat feature;
 - Manage the common elements of our buildings or properties;
 - Handle your customer services requests, including direct your questions to appropriate individuals, investigate and address any of your concerns, and improve and monitor our customer support responses; and
 - Help us diagnose technical and service problems and administer our Websites.
- **Security and Fraud Prevention:** We use your contact information, visual information, other identifying information, financial information, geolocation data, internet activity and browsing history, and inferences to protect the Websites, our company, our properties and others, and for, fraud detection, theft prevention, emergency response purposes, and legal compliance.

5. How your information is collected

Personal information may be collected in a number of ways, including but not limited to: in person, over the phone, by mail, by fax, over the Internet (including from our Websites, applications or by email) and from third parties. Personal information collected from third parties may include financial information, demographic information and other identifying information from third party service providers, such as your credit reporting agencies, background check service providers, and if you submitted your personal information to us via a third-party referral source, that third party referral source.

Personal information may be collected in a number of circumstances, including but not limited to when you: send an inquiry to us, complete a rental application form, complete a tenancy rental/lease agreement, submit a maintenance request, submit a request for proposal, execute service contracts and execute transaction documents.

Personal information is often collected from property owners, tenants, prospective tenants, prospective investors, shareholders, procurement professionals, employers, financial institutions,

credit reporting agencies, existing project management companies where management of existing properties are transferred to Tricon and trades companies.

Personal information may be collected from your financial, investment and/or legal advisors when you are looking at entering into investment and/or other commercial transactions with Tricon.

We collect Internet or other electronic activity passively using tools like browser cookies, SDKs and other similar technologies. This activity is further described in the Cookies and Online Tracking section below.

6. Cookies and Online Tracking

We may collect usage information from users of our Services, including through the use of cookies, web beacons and tracking pixels, SDKs, and other similar technologies. Cookies are very small text files that are stored on your browser or device. Usage information collected from our Websites and our applications may include your device type, device identifier, IP address, MAC address, location, browser type, operating system, duration of use, user behaviour, length of time spent on the Services, and frequency of use. The usage information may be associated with other personal information. We may use this information for purposes including remembering your preferences and settings, determining the popularity of certain content, authenticating users, determining the effectiveness of any advertising campaigns, targeting advertisements, and analyzing the behaviour and interests of people (including traffic and trends) accessing our Websites and applications. We may also allow others to provide analytics services (e.g. Google Analytics) and audience measurement services for us, to serve advertisements on our behalf on the Internet, and to monitor and report on the performance of those advertisements. These third parties may perform such services through the use of cookies, web beacons and tracking pixels, SDKs, and other similar technologies. By modifying your browser settings, you may be able to block cookies or otherwise make adjustments to the use of cookies, although this may impair the functioning of certain Tricon Services. You may also opt out of marketing cookies through our Privacy Preferences. Our systems do not recognize browser “Do Not Track” signals, but several of our service providers who utilize these cookies on our Website enable you to opt out of targeted advertising practices. To learn more about these advertising practices or to opt out of this type of advertising, and to opt out of certain other cookies, you can visit www.networkadvertising.org or www.aboutads.info/choices/.

We use Google Analytics on the Site and Services to analyze how users use the Site and Services, and to provide advertisements to you on other websites. For more information about how to opt out of having your information used by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout/>.

If you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party directly. If the third party does not sufficiently respond to your inquiries, please let us know immediately.

Your personal information will only be used or disclosed in accordance with the purposes for which it was collected, unless you have otherwise consented or except where required or permitted by law.

7. Browsing Session Information

We use technology that maintains a record of your browsing session, including without limitation, the Facebook pixel. We use this information for quality control, customer service, fraud prevention and security, and marketing purposes. To learn more about Facebook ads, click [here](#).

8. We may monitor and record telephone calls and chats

For the purpose of maintaining quality service, telephone calls and chats to our customer service lines may be recorded. If your call is subject to a quality assurance program, you will be so advised prior to speaking with a representative.

9. Combining Information

We may combine personal information: (a) internally with other information collected and/or stored by our affiliates in relation to our different products and Services offered by Tricon and (b) with demographic information, publicly available records and other third-party information sources. We may use this information to provide you with a customized experience, to promote and properties and Services available through Tricon, or as otherwise permitted by this Policy.

10. Categories of Third Parties We Share Personal Information With

We will only disclose your personal information to third parties pursuant to the terms of this Policy, if you have otherwise so consented or if required or permitted by law. Tricon's affiliated companies, partners and third-party service providers may be located in countries outside Canada and the United States, such as Europe, where the data protection laws differ, and may be subject to disclosure in accordance with the laws of such foreign jurisdictions including rights afforded to officials from government or law enforcement in those jurisdictions who may be authorized under law to request and be granted access to personal information.

Parties Related to Your Obligations:

We may share personal information with third parties, such as co-residents of your obligations under the terms of your residential lease agreement, or to any third-party payor of your obligations under the terms of your residential lease agreement or a related housing agreement. Because Tricon Residential often owns properties together with other investors, we may share personal information with such investors for audit, management, legal, billing, strategy or administrative purposes including defending and enforcing our legal rights or the legal rights of third parties.

Our Service Providers:

We may contract with companies or persons to provide certain services including for purposes of payment processing, data hosting and processing, website development, analytics, billing, leasing or similar services, fulfilling audit or reporting requirements financing, insuring, sale, securitization, assignment or other disposal of all or part of our business or assets. We call them our Service Providers. We provide our Service Providers with the information needed for them to

perform these services. We also ask our Service Providers to confirm that their privacy practices are consistent with ours.

Our Select Partners:

From time to time we might establish a business relationship with other persons or entities whom we believe trustworthy and whom we have asked to confirm that their privacy policies are consistent with ours. These are known as our “Select Partners.” In such cases we might rent, exchange, share and/or cross-reference information, including contact information about you that will enable such persons or entities to contact you regarding products and services that may be of interest to you.

Homeowner’s Association – USA only

We may disclose your personal information to Homeowner’s Associations (HOAs) for the purpose of satisfying HOA requirements.

Our Affiliates:

We may share personal information with businesses controlling, controlled by, or under common control with Tricon Residential for the purpose of providing support on behalf of Tricon Residential.

For Law Enforcement and Courts

The type of information we are legally required to disclose may relate to government investigations and tax reporting requirements. In some instances, such as a legal proceeding or court order, we may also be required to disclose your personal information to authorities.

Your personal information may be disclosed in situations where we are legally permitted to do so, such as in the course of employing reasonable and legal methods to enforce our rights or to investigate suspicion of unlawful activities. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property and safety of ourselves and others.

Sale of Assets

You also understand and agree that we may use your personal information and disclose your personal information to third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of our business or assets (including a lease agreement) for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples, permitting such parties to determine whether to proceed or continue with the transaction, fulfilling any reporting or audit requirements to such parties, and/or disclosing personal information as part of concluding a sale or transfer of assets. In such cases, we will take reasonable measures to protect the personal information we disclose. Our successors and assigns may retain, collect, use and disclose your personal information for

substantially the same purposes as those set out in this Policy. In the event the transaction does not go through, we will require, by contract, the other party or parties to the transaction not to use or disclose your personal information in any manner whatsoever for any purpose, and to return or destroy such personal information.

Public Information

If you post a review, make a comment, or otherwise submit personal information on a public forum such as social media accounts or public forums, on our Websites or other applications, your communications may be viewable by the public.

Sharing Between Jurisdictions

Tricon has operations in both Canada and the United States and there is often sharing of administrative, processing and storage functions among the Tricon entities. With that in mind, personal information may be used, processed and stored in both Canada and the United States, and such personal information will be subject to the laws of the jurisdiction in which it is used, processed and/or stored, including access rights by government authorities.

11. Keeping your information accurate

We make every reasonable effort to keep your personal information as accurate, complete and up to date as necessary. If desired, you may verify the accuracy and completeness of your personal information in our records.

Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file, we will remedy any such errors on a timely basis. In the event that inaccurate information is mistakenly sent to a third party, we will communicate relevant changes to the third party where appropriate.

12. Protecting Your Personal Information

a) Access to your information within Tricon

Our employees and contractors understand the importance of keeping your information private. All employees and contractors are expected to maintain the confidentiality of personal information at all times and failure to do so will result in appropriate disciplinary measures, including dismissal.

b) Disposal and Retention

Except as otherwise permitted or required by law, your personal information will be retained for so long as is reasonably necessary to fulfil the purposes for which it was collected or as required by law.

c) Safeguarding your information

To ensure that your personal information is protected, we utilize security safeguards that are on par with the industry standard. We use modern technologies to ensure that your confidential

information is not compromised. We keep electronic customer files in a secured environment with restricted access and use. Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your information, to the extent permitted by law, we do not guarantee or warrant the security of any information you transmit to or from our web sites, and you do so at your own risk.

13. Investors and Subscriber's Personal Information

Occasionally, individuals are also investors in Tricon's business, typically through subscribing for units, shares or other securities in Tricon or one of Tricon's projects and/or investment vehicles (for this section, those individuals shall be referred to as "**Subscribers**"). The terms in the rest of this Policy shall govern, in addition to the terms in this section, in relation to each Subscriber. Each Subscriber agrees that their personal information is being collected and may be used by Tricon or transfer agents for the purposes of completing the offering or transactions requested by the Subscriber. This includes, without limitation, determining the Subscriber's eligibility to purchase the units, shares and/or other securities, preparing and registering certificates representing securities or arranging for non-certificated, electronic delivery of same, and completing filings required by any securities regulatory authority or exchange. Such personal information may be disclosed by Tricon to: (a) securities regulatory authorities, stock exchanges, such as the Toronto Stock Exchange; (b) Tricon's registrar and transfer agent; (c) any government agency, board or other entity; (d) as required or permitted by law; and (e) other parties involved in the transactions to whom the personal information must reasonably be disclosed for purposes of assessing or concluding the transactions, including Tricon's legal counsel and its other agents and representatives, and may be included in documentation in connection with the transaction. Information in the custody and control of a public sector entity may be subject to disclosure through freedom of information legislation.

If the Subscriber is resident or otherwise subject to Canadian securities laws: (i) the Company may deliver to the applicable securities regulatory authority or regulator certain personal information pertaining to the Subscriber, including such Subscriber's full name, residential address and telephone number, email address, the number of units, shares and/or other securities purchased by such Subscriber, the aggregate subscription or purchase price, the prospectus exemption under Canadian securities laws relied on, if applicable, and the date of distribution of the share, unit and/or other securities; (ii) such information is being collected indirectly by the applicable securities regulatory authority or regulator under the authority granted to it in securities legislation; (iii) such information is being collected for the purposes of the administration and enforcement of applicable Canadian securities laws of the local Canadian jurisdiction; and (iv) the Subscriber may contact the public officials with respect to questions about the security regulatory authority's or regulator's indirect collection of such information.

14. Privacy Rights Under Certain State Privacy Laws

If you are a resident of California Connecticut, Utah or Virginia, you may have certain privacy rights under applicable laws in your state ("**State Privacy Laws**"). This section describes those rights and how you can exercise them with Tricon.

Rights Requests

Right to Know, Right to Correct and Right to Deletion

You can request what personal information we have collected, used, disclosed, shared/processed for targeted advertising and sold in the preceding 12 months, unless you request a longer period of time.

You can also request the following categories of information:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information was collected;
- The business or commercial purpose for collecting, selling or sharing the personal information; and
- The categories of third parties with whom we sold personal information to or shared personal information with.

You can also request that we delete your personal information. We may not delete all of your personal information if one of the following exceptions applies:

- **Transactional:** to complete a transaction for which the personal information was collected, provide a good or service requested by you, or perform a contract we have with you;
- **Security:** to detect data security incidents; preserve the integrity or security of systems; or investigate, report, or prosecute those responsible for any such action.
- **Error Correction:** to debug or repair any errors;
- **Legal:** to protect against fraud, harassment, malicious or deceptive activities, or illegal activity or to comply with applicable law or a legal obligation, or exercise rights under the law, such as the right to free speech; to assist another party with any of its obligations under applicable privacy laws; or
- **Internal Use:** to use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information (i.e. to improve our services).

You may also request that we correct certain inaccurate information that we have about you. For a faster way to correct your information, you may go to your account to correct it yourself.

To submit a request to know, a request to correct or a request to delete, please click [here](#). In order to verify your identity, we will send you a verification email. In order to designate an authorized agent to act on your behalf you must provide the authorized agent with written permission to do so, and your authorized agent must submit that written proof mailed to the address below so that it is received prior to the time the agent makes the request on your behalf. A request to know, a request to correct or a request to delete may alternatively be initiated by emailing us at privacy@triconresidential.com. If you wish to make multiple requests under this section, we recommend sending the deletion request last, as we will not be able to fulfill your other requests once we have deleted your information.

California based employees, former employees, prospective employees and contractors can click [here](#) to submit a request to know, a request to correct or a request to delete personal information.

Do Not Sell or Share My Personal Information/Use My Personal Information for Targeted Advertising

Personal Information that We Sell or Share/Use for Purposes of Targeted Advertising

Under California law, “share” means disclosing your personal information by us to a third party for cross-context behavioral advertising, in exchange for money or anything else of value. Thus, when we use the term “share” under this section, we are using it in the narrow meaning of how it is defined under California law. Other State Privacy Laws do not use the term “share,” but describe the concept as using personal information for targeted advertising.

Under California law, “sell” means exchanging your personal information by us with a third party for money or anything else of value. Under Virginia law, “sell” is the exchange of personal information for money only. Through our participation in digital advertising networks, we may sell, or share/use for targeted advertising purposes, the following categories of personal information:

- Identifiers
- Characteristics of protected classifications under State Privacy Laws and federal law;
- Internet/electronic activity;
- Geolocation data;
- Commercial Information; and
- Inferences drawn from the categories described above in order to create a profile about you to reflect your preferences, characteristics, behavior and attitudes.

We do not knowingly sell or share the personal information of consumers under 16 years of age.

Right to Opt Out of Sale or Sharing/Using your Personal Information for Targeted Advertising

You can request to opt-out of the sale of or the sharing of/use of your personal information for targeted advertising by clicking and toggling the toggle button off in the “Targeting Cookies” tab, or by enabling opt out preference signal for a browser or plug-in that recognizes requests for “Do not Sell”, “Do not Share” or “Opting Out of Targeted Advertising”.

We do not “sell” or “share” Sensitive Personal Information (as defined under State Privacy Laws).

Sensitive Personal Information

We do not collect or process Sensitive Personal Information, as defined by California law, for inferring characteristics or use or disclose Sensitive Personal Information for purposes other than those permitted by law.

Non-Discrimination

We will not discriminate against you for exercising any of your rights under State Privacy Laws and we will not deny you goods or services, charge you a different price, or provide you with a lesser quality of goods or services if you exercise any of your rights under State Privacy Laws.

Right to Appeal

If you are a Virginia or Connecticut resident and we were unable to fulfill your request, you may appeal our request by emailing us at privacy@triconresidential.com within fourteen days of our decision, including “Appeal Request” in the subject line, with a detailed reason for your appeal, as well as your state of residence.

15. Canada Privacy Rights

Right to Know, Correct, Delete and Opt Out

You can request what personal information we have collected, used, and disclosed. You can also request that we correct or delete your personal information in certain circumstances. You can also request to opt out of certain information handling practices that are not reasonably necessary to respond to your request or fulfil your engagement with Tricon.

To submit a request to know, correct, or delete, please click [here](#). In order to verify your identity, we will send you a verification email. In order to designate an authorized agent to act on your behalf you must provide the authorized agent with written permission to do so, and your authorized agent must submit that written proof mailed to the address below so that it is received prior to the time the agent makes the request on your behalf. A request to know, correct, delete or opt out may alternatively be initiated by emailing us at privacy@triconresidential.com. Any request to delete or opt out may limit how Tricon can engage with you.

To opt out of sharing your personal information with third parties please e-mail us at privacy@triconresidential.com and clearly state your request, including your name, mailing address, e-mail address and phone number.

16. Addressing Your Inquiries and Concerns

We are happy to provide you with a copy of this Policy and to discuss any of its content with you. Upon request, we will also let you know what information we have collected on you, how it is used and any third parties to whom your personal information has been disclosed. See Section 11 below for additional rights you may have.

Please direct all questions or enquiries about this Policy to:

USA:

Tricon Residential
Attention: Privacy Compliance Officer

Canada:

Tricon Residential
Attention: Privacy Officer

15771 Red Hill Ave.
Tustin, CA 92780
Email Address: privacy@triconresidential.com

7 St Thomas St #801
Toronto, ON
M5S 2B7
Email: privacy@triconresidential.com

17. Updating this Privacy Policy

Tricon strives to evolve to meet our customer's needs and expectations and that means our products and services may change and how we offer our products and services may change. With that in mind, we review our privacy practices from time to time, and our information handling practices may change. If Tricon makes a material change to this Policy, we will post a notice on our Websites and highlight the changes. We may also notify you by email or other electronic means.

Any changes to our privacy standards and information handling practices will be reflected in this Policy in a timely manner. Tricon reserves the right to change, modify, add, or remove portions of this Policy at any time. Please check this page periodically for any modifications. To determine when this Policy was last updated, please refer to the modification date at the bottom of this Policy.

If at any point you do not agree with the terms of this Policy, you must not use Tricon's Services or provide personal information to Tricon.

18. Websites and Apps Governed by this Privacy Policy

Our Websites and any of our applications available from our Websites or third-party platforms are governed by the provisions and practices stated in this Policy. Our Websites and such applications may contain links to third-party sites or applications that are not governed by this Policy. Although we endeavour to only link to sites or applications that share our commitment to your privacy, please be aware that this Policy will no longer apply once you leave our Websites or such applications, and that we are not responsible for the privacy practices of third-party sites or applications. We therefore suggest that you closely examine the respective privacy policies of third-party sites and applications to learn how they collect, use and disclose your personal information.

19. Children

Our Websites are not directed to children under the age of 13, and we do not solicit or knowingly collect any personal information from children under the age of 13.

20. Governing Law and Personal Information in Other Jurisdictions

This Policy and all related matters shall be interpreted and construed in accordance with the laws of the relevant jurisdiction.

Tricon may perform activities outside of your location directly and also indirectly through third parties. Personal information provided to us, our service providers, payment processors, affiliates and subsidiaries may be stored inside or outside of Canada and the United States. The use made by such third parties shall be in accordance with the terms of this Policy. You acknowledge and

agree that, as a result, your personal information may be processed, used, stored or accessed in other jurisdictions and may be subject to the laws of those jurisdictions. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement in other provinces, states or countries.

Please print copy of this policy for your records and please check the Website frequently for changes.

Last Updated – [May 3, 2023]