

## Scope and Application of this Privacy Policy

This Privacy Policy and the nine accompanying principles are observed by 20|20 Group when collecting and disclosing the personal information of its clientele. The information, including these nine principles, contained in this Privacy Policy must be read and understood as a whole. This Privacy Policy has been customized to personal information issues specifically related to 20|20 Group.

The general scope and application of the Privacy Policy for 20|20 Group is as follows:

1. This Privacy Policy applies to personal information about clients of 20|20 Group that is collected, used or disclosed by 20|20 Group and which is protected by privacy legislation in Canada.
2. This Privacy Policy does not apply to personal information, such as:
  - a. A client's name, title, business address, including the business e-mail address, or business telephone or fax number.
  - b. Other information that is not protected by privacy legislation in Canada.
  - c. Other information about a client that is publicly available.

## Definitions

**20|20 Group** – includes 20|20 Group Inc. and its affiliated companies, 20|20 Properties Inc., 20|20 Real Estate Partners Inc., 20|20 Resorts Inc. and 20|20 Financial Inc.

**Client** – a client is any individual, in their capacity as an individual either personally or through a business carried on as a sole proprietorship or partnership, who uses or applies to use the products and services of 20|20 Group. The term 'client' includes a prospective client who has provided 20|20 Group with personal information.

**Collection** – the act of gathering, acquiring, recording and/or obtaining personal information.

**Consent** – the voluntary agreement with respect to the collection, use and disclosure of personal information for defined purposes. Consent can either be expressed, implied or deemed and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of 20|20 Group. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. 'Deemed consent' is consent that is deemed to be given pursuant to applicable legislation or other regulations.

**Personal Information** – information about an identifiable individual, but does not include aggregated information that cannot be associated with a specific individual. 'Personal information' also excludes certain information that is excluded pursuant to applicable legislation or regulations, such as publicly available information or business contact information, as and when applicable.

## 20|20 Group's Nine Privacy Principles

### 1. Accountability

20|20 Group's management team is ultimately responsible for ensuring compliance with this Privacy Policy and related privacy legislation in Canada. 20|20 Group is responsible for the personal information under its control and shall designate up to two persons to act as privacy officers accountable for 20|20 Group's compliance with the following principles:

1.1 Upon request, 20|20 Group will make known the title of the person(s) designated to oversee this Privacy Policy and 20|20 Group's compliance with said policy.

1.2 20|20 Group is responsible for the personal information in its possession or under its control and shall use appropriate means to protect this personal information while being processed by a third party.

1.3 The internal policies and procedures needed to give effect to this Privacy Policy will be put in place by 20|20 Group.

## **2. Identifying Purposes for the Collection of Personal Information**

20|20 Group collects personal information for the following identified purposes:

- To establish and maintain a responsible relationship with clients and to provide ongoing service.
- To understand the needs and preferences of its clients and to then provide information related to these needs and preferences to these clients.
- To develop, enhance and market its products and services to clients.
- To provide these products and services to clients.
- To manage and develop the business and related operations of 20|20 Group
- To meet legal and/or regulatory requirements.

## **3. Consent for the Collection, Use or Disclosure of Personal Information**

Generally, the knowledge and consent of an individual are required for the collection, use or disclosure of personal information. When obtaining this consent, 20|20 Group will use reasonable efforts to ensure the individual is advised of the purpose for using or disclosing this personal information, and this purpose shall be expressed in a way that is reasonably understood by the individual.

Personal information may be collected, used or disclosed without the knowledge or consent of the individual by 20|20 Group under certain circumstances in the case of an emergency where the life, health or security of an individual is threatened.

An individual may withdraw their consent at any time, subject to legal or obligations and reasonable notice. Individuals should contact 20|20 Group for more information regarding the implications of withdrawing consent.

## **4. Limiting the Use, Disclosure and Retention of Personal Information**

Except with the expressed consent of the individual or as required by law, 20|20 Group will not use or disclose personal information for purposes other than those for which this information was collected.

Personal information may be disclosed by 20|20 Group to:

- a. A person who in the reasonable judgment of 20|20 Group is seeking the information as an agent of the individual.
- b. A company or individual employed to perform functions on behalf of 20|20 Group, such as research or data processing.
- c. Another company or individual for the development, enhancement, marketing or provision of any of 20|20 Group's products and services including Signature Service, Finepoint Resort Group, 20|20 Realty and related companies.
- d. An agent used by 20|20 Group to evaluate the client's creditworthiness or to collect the client's account.
- e. A credit reporting agency.
- f. A public authority or agent of a public authority, if in the reasonable judgment of 20|20 Group, it appears that there is imminent danger to life or property that could be avoided or minimized by disclosure of the information.
- g. A third party or parties where the client consents to such disclosure, where disclosure is permitted by the privacy legislation of Canada or where disclosure is required by other laws.

Furthermore, personal information will be kept by 20|20 Group only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the particular circumstance, where personal information has been used to make a decision about a client, 20|20 Group will retain, for a period of time that is reasonably sufficient to allow access by the individual, either the actual information or the rationale for making the decision.

## **5. Accuracy of Personal Information**

Reasonable steps will be taken by 20|20 Group to ensure the personal information of its clients is as accurate, complete and up-to-date as is appropriate and reasonable for its purposes.

5.1 Personal information used by 20|20 Group shall be sufficiently accurate, complete and up-to-date as to minimize the possibility that inappropriate information may be used to make decision about an individual.

5.2 20|20 Group shall update personal information about individuals as and when reasonably necessary to fulfill the identified purposes or as reasonably requested by the individual.

## **6. Security Safeguards**

20|20 Group will take reasonable steps through appropriate security measures to protect personal information against risks, such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction. Personal information disclosed to third parties shall be protected by contractual agreements that require a comparable level of protection which 20|20 Group provides to clients and stipulates the confidentiality of the information and the expressed purposes for which it is to be used.

20|20 Group's employees that have access to personal information will be required to respect the confidential nature of this information.

## **7. Openness – Policies and Procedures**

20|20 Group shall make information about its policies and practices related to the management of personal information readily available to individuals. This includes providing copies of its Privacy Policy upon request and making said information easy to understand. The title and addresses of the person(s) accountable for 20|20 Group's compliance with this Privacy Policy and to whom inquiries or complaints can be made shall be readily available.

## **8. Access to Personal Information**

20|20 Group shall, upon request, allow a reasonable opportunity to its clients to review the personal information collected, at a minimal or no cost to the individual. This individual will then be able to challenge the accuracy and/or completeness of this personal information and have it duly amended as needed.

8.1 In certain circumstances, 20|20 Group may not be able to provide access to all of the personal information it holds about an individual. For instance, 20|20 Group may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, 20|20 Group may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law. If access to personal information cannot be provided, 20|20 Group shall provide the reasons for denying access upon request.

8.2 An individual requesting access to their personal information may be required to provide sufficient identification to permit 20|20 Group to authorize access to the individual's files, in order to safeguard this personal information.

8.3 Individuals seeking access to their personal information must do so by written request to the designated 20|20 Group Privacy Officer.

## **9. Compliance Challenges and Inquiries**

Procedures for addressing and responding to all inquiries or complaints from individuals about the handling of their personal information shall be maintained by 20|20 Group. The designated Privacy Officer will be responsible for addressing these inquiries or complaints. This officer may seek external advice, where appropriate, before providing a final response.

Individuals protected by this Privacy Policy may seek advice from the Office of the Privacy Commissioner in British Columbia by calling 1-250-387-5629, or file a written complaint with this office. All individuals are, however, encouraged to follow 20|20 Group's internal processes and procedures for addressing their concerns.

Please contact our Privacy Officer with any questions or concerns you may have about this Privacy Policy or practices.

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