

As the ICE District JV Inc. ("ICE District JV"), we are committed to maintaining the accuracy, confidentiality, and security of your Personal Information. We have developed this Privacy Policy to describe how we collect, use and disclose the Personal Information of those individuals who visit or interact with our Site. We have developed other documents that describe our privacy policies and practices with respect to our employees and with respect to our customers, suppliers and other parties with whom we interact. If you are unsure of which Privacy Policy applies to you, please contact our Privacy Officer for more information.

DEFINITIONS

In this Privacy Policy, we use the following defined terms: **"We" or "us"** means ICE District JV and our Affiliates. **"Site"** means the ICE District JV website at www.icedistrictproperties.com. **"Personal Information"** means information about you as an identifiable individual, other than your business title or business contact information when used or disclosed for the purpose of business communications. This includes information such as your name, home address, telephone number, personal e-mail address, and personal social media addresses. **"Affiliates"** means other corporations, partnerships or other business entities that are under common ownership with ICE District JV. **"Service Providers"** means other companies and individuals who provide us with services but who are not our employees or Affiliates.

UPDATES

WE MAY UPDATE THIS PRIVACY POLICY WITHOUT PRIOR NOTICE TO YOU, AND ANY CHANGES WILL BE EFFECTIVE IMMEDIATELY UPON THE POSTING OF THE REVISED PRIVACY POLICY ON THE SITE. WE ENCOURAGE YOU TO REFER BACK TO IT ON A REGULAR BASIS. THIS POLICY WAS LAST UPDATED ON JUNE 13, 2017

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1. APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy applies to Personal Information that we collect through the Site or when you contact us via the Site or the email links provided therein.

2. INFORMATION WE COLLECT

We may collect information when you provide it to us. We may also collect information about you through automated technologies on our Site and from third parties. When we link information to you that was collected through automated technology, we treat that information as Personal Information.

INFORMATION THAT YOU PROVIDE

ICE District JV and our Affiliates and Service Providers may collect Personal Information from you when you provide it. For example, you might provide us with your Personal Information when you e-mail us, sign up for an e-mail newsletter, submit a resume or job application, participate in a promotion, survey or other feature of the Site, or communicate or interact with us through our Site. If you do not want your Personal Information collected, please do not submit it.

AUTOMATED INFORMATION AND COOKIES

When you visit or interact with the Site, we and our Affiliates and Service Providers may use technologies that automatically collect information about how you access, navigate and leave the Site. For example, we may collect information on what other website(s) you came from before visiting the Site, what browser type and operating system you are using, the internet protocol (IP) address you are accessing the Site from, the pages you are navigating through and the website you go to after visiting our Site. In general, we do not associate this type of information with other Personal Information about you. Our Site uses cookies. Cookies are data files that are placed on the device or computer you use to access our Site. These cookies may be used to remember your language preference and to facilitate your navigation of our Site. We may also use technologies such as web beacon technologies (sometimes referred to as pixel tags and clear GIFs). These are transparent images that provide us, our Affiliates or our Service Providers with information about whether a page or e-mail has been viewed or forwarded and may communicate with our servers or those of our Affiliates, or our Service Providers in order to obtain images and other content and to relay information about the IP address being used to access our Site and information about your browser. We may use cookies and web beacons to present advertisements to you that we think may be of interest to you. Although the information we collect through cookies and web beacons is typically not combined with information that would identify you, there is the potential for this information to be associated with you and, therefore, where it is associated with you, we treat it as Personal Information. This Site uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the Site analyze how users use the site. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Site, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP

address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser; however please note that if you do this you may not be able to use the full functionality of this Site. For more information on how Google collects, uses or discloses your Personal Information, please see Google's privacy policies at [www.google.com/privacy]. We are not responsible for Google Analytics' or Google's privacy practices. Please also see [cookies, advertising and how to opt-out](#) for more information on how we use cookies and web beacons and how you may opt-out of their use.

INFORMATION FROM THIRD PARTIES

As a general rule, we endeavor to collect Personal Information directly from you. In most circumstances where the Personal Information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such third party (such permission may be given directly by you, or implied from your actions: for example, if you are on another website and you opt-in to receive information from us, we may receive information about you).

3. USES OF THE INFORMATION WE COLLECT

We collect Personal Information to enable us to manage, maintain and develop our business and operations, including:

- to respond to your inquiries and provide you with information, such as information on our properties and events;
- to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to provide you with newsletters and other advertising;
- to administer your participation in a contest or promotion;
- to provide legal notices;
- to protect us against error, fraud, theft, and damage to our goods and property;
- to enable us to comply with applicable law or regulatory requirements; and
- any other reasonable purpose to which you consent.

In addition, we may use information in order to learn about our Site visitors in order to improve our Site and to develop new products and services. For example, we use information received from automated technologies to determine how many visitors visit areas of our Site, how long they remain on our Site, and whether they use the hyperlinks we provide. Please also see above for more information on how we use cookies and web beacons and cookies, advertising and how to opt-out for how you may opt-out.

4. HOW WE OBTAIN YOUR CONSENT

Typically, we will seek your consent at the time that we collect your Personal Information. In certain circumstances, your consent may be obtained after collection but prior to our

use or disclosure of your Personal Information. If we plan to use or disclose your Personal Information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure. By accessing the Site you are consenting to the collection, use, and disclosure of your Personal Information for the purposes described herein and for which it was collected when you provided it to us or to a third party and give the third party permission to send that information to us. The purposes for the collection of Personal Information that you provide to us are usually stated or implicit in the context in which you gave it to us or a third party that provides it to us. For example, if you provide us with your e-mail address so that we can provide you with a newsletter, we obtain your implied consent to use your e-mail address for providing you with our newsletters. If you provide us with your e-mail address when you make an inquiry, we obtain your implied consent to use it for the purposes of responding to your inquiry. We may ask you for your opt-in consent to use your e-mail for other purposes, such as adding you to our newsletter list. We may use opt-out consent for cookies and web beacons and other automated technologies to collect Personal Information as described above. If you do not want us to collect or use this information, please do not visit our Site. In addition, you may opt-out by using browser settings that will not accept cookies or by setting your e-mail application to not download images. In addition, you may opt-out of certain online advertising. Please see [cookies, advertising and how to opt-out](#) for more information. We may collect, use or disclose Personal Information without your knowledge or consent when authorized by law or regulatory requirements to do so, for example, we may collect Personal Information in connection with an investigation into our website security. You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Privacy Officer using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

5. HOW WE SHARE YOUR INFORMATION

We may share information we collect about you in the following circumstances: **AFFILIATES AND SERVICE PROVIDERS PROVIDING SERVICES TO US OR ON OUR BEHALF** Our Affiliates and Service Providers provide services to us and may provide services to you on our behalf. We may share your Personal Information or information that we have collected through automated means on our Site with our Affiliates and Service Providers. For example, our Affiliates and Service Providers may host our Site, analyze data collected from our Site, provide customer service on our behalf, administer our promotions, provide marketing or promotional assistance, post our advertisements, and collect your feedback on our Site and advertisements. **AGGREGATED OR DE-IDENTIFIED INFORMATION** We may share information in aggregated statistics and de-identified form with third parties. Information when aggregated or de-identified is not Personal Information. **WHEN YOU SPECIFICALLY AGREE TO US SHARING YOUR INFORMATION** In some situations, you may specifically agree with us sharing your information. For example, if you provide us with your contact information, e-mail address, Facebook account, or Twitter account for the

purposes of signing up for information or marketing offers from an Affiliate or third party, we may share your Personal Information for that purpose. Your Personal Information will be subject to the privacy policy and business practices of such Affiliate or third party. **BUSINESS MERGERS OR ACQUISITIONS** In addition, Personal Information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of or the grant of a security interest in, all or a part of ICE District JV through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your Personal Information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise. **OTHER LEGALLY REQUIRED OR PERMITTED DISCLOSURES** We may also disclose your Personal Information in the following circumstances: (a) if that disclosure is necessary for us to receive legal advice; (b) to collect a debt from you; (c) if we are required to disclose your Personal Information in order to comply with any legal obligation or the decision of a judicial authority; (d) if disclosure is requested by an investigatory body, law enforcement official or governmental authority which has lawful authority to request the disclosure of the information in respect of an investigation; (e) if we have reasonable grounds to believe that the information relates to a breach of an agreement or contravention of a law; or (f) where we are otherwise permitted to do so by applicable law or regulatory requirements.

6. HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION

We may retain your Personal Information to fulfill the purposes for which it was collected, including for legal purposes. We maintain and also require our Service Providers to maintain administrative, technical and physical safeguards in an effort to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of your Personal Information. For example, we endeavor to use password protection where appropriate and limit access to staff, employees, Affiliates and Service Providers who need to have access to it for the purposes for which it was collected and who have acknowledged their obligations to protect your Personal Information. When we transfer your Personal Information, we may use encryption where appropriate. Please understand, however, that we cannot and do not guarantee the security of your Personal Information. If you are located in Canada, please be aware that information we collect may be transferred to and processed in the United States and other countries in which our Affiliates and Service Providers have operations **[NTD: Need to list the relevant countries]**. The security of your Personal Information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of Personal Information that is in our custody or control.

7. LINKS TO EXTERNAL CONTENT

Our Site may link or direct you to other websites, services or external content resources which are outside of our control. Once you have left our Site, we cannot safeguard and are not responsible for the protection and privacy of any Personal Information which you

provide on other websites. These other websites may send their own cookies to your device and may independently collect data or solicit Personal Information. Please review the applicable terms of use and privacy policies for those other websites.

8. COOKIES, ADVERTISING AND HOW TO OPT-OUT

As described above, we, or our third-party advertising Service Providers, may use cookies, web beacons and other technologies. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject any cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it. You may also opt-out of network advertising programs that track your activities across multiple websites to deliver personalized advertising content to you. Please visit [Digital Advertising Alliance of Canada Opt-Out Page](#), [NAI Opt-Out Page](#) and the [Ad Choices Opt-Out Page](#). These websites provide tools that identify member companies that have cookies on your browser and provides mechanisms to opt-out of those cookies. You will still receive other types of advertising from participating companies; however, it will not be based on your interests. Deleting browser cookies can remove your opt-out preferences, so you should use these tools periodically to ensure that your preferences are up-to-date.

9. UPDATING AND ACCESSING YOUR PERSONAL INFORMATION

It is important that the information contained in our records is both accurate and current. If your Personal Information happens to change during the course of our relationship, please keep us informed of such changes. In some circumstances we may not agree with your request to change your Personal Information and will instead append an alternative text to the record in question. If you wish to verify, correct, or update any of your Personal Information collected by us or our Service Providers or Affiliates acting on our behalf and that we have received from these Service Providers or Affiliates, you may do so by contacting us at the address listed below in How to Contact Us. Please note that we may request Personal Information from you in order to authenticate your identity before providing you with access to your Personal Information or complying with any request to correct or update your Personal Information. Your right to access the Personal Information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the Personal Information that we hold about you. In addition, the Personal Information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your Personal Information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions. We may routinely delete certain records that contain Personal Information in accordance with our record-keeping practices. Although we will make efforts to comply with any request that you may make to destroy Personal Information

about you that is not otherwise required by us to fulfill legal requirements or to protect our interests, you should be aware that it is not always possible to completely remove or delete all of your Personal Information from our databases without some residual copies of data because of backups, archival systems and other reasons.

10. HOW TO CONTACT US

If you have any questions or comments about this Privacy Policy, please contact us at info@icedistrictproperties.com or via mail, at: Privacy Officer ICE District JV Inc. Suite 2500, 10111 - 104 Avenue NW Edmonton, Alberta T5J 0J4

10. INTERPRETATION

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'. This Privacy Policy does not create or confer upon any individual any rights, or impose upon ICE District JV or its Affiliates any obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.