

Otto by Oxford Privacy Notice

Last Updated: March 11, 2021

Thank you for using Otto by Oxford™. Please read this Privacy Notice and the [Oxford Privacy Statement](#).

The Oxford Privacy Statement provides general information on how Oxford Properties Group (Oxford) uses your personal information. This Privacy Notice provides supplemental information relevant to your use of Otto. References to **App** in these Terms of Use means the software and services comprising the mobile app and web-based platform called **Otto by Oxford**. References to **Oxford's services** means products and services provided by Oxford within the App.

You agree to this Privacy Notice when you use the App even if you choose not to read it. The App is not for children under the age of 16.

What does “powered by Lane” mean?

Lane Technologies Inc. is the developer and provider of the App. The [Lane Privacy Policy](#) applies to personal information collected and used by Lane to provide the App. Oxford is not responsible for how Lane uses your personal information or for the security of the personal information you provide to Lane.

What do I need to know about third party services in the App?

The App provides you with access to a virtual marketplace. You will find information and services provided by third parties, such as tenants, retailers and others.

The personal information collected by a third party will be governed by that third party's privacy policy. Oxford is not responsible for how a third party uses your personal information or for the security of the personal information you provide to a third party.

How does Oxford collect personal information?

Oxford collects personal information when you use the App in two ways:

- directly from you when you interact with Oxford through the App
- from Lane as part of Lane sharing data about usage of the App

Oxford may combine personal information that Oxford collects through the App with other information about you that Oxford collects through other Oxford services. You can find more information about privacy and these other services in the [Oxford Privacy Statement](#).

What personal information does Oxford collect and use?

The most common types of personal information that Oxford collects and uses are:

<i>Type of personal information</i>	<i>Why Oxford collects it</i>
App Registration Information <ul style="list-style-type: none">- first and last name- buildings you subscribe to	Identifying users of the App and the buildings they visit Providing registration confirmations Communicating with you, such as when you interact with Oxford's contests, offers, promotions, and questionnaires Fulfilling prizes, offers and promotions Responding to your inquiries and requests
Email address	Emailing newsletters and promotions (if subscribed) Providing registration confirmations Communicating with you, such as when you interact with Oxford's contests, offers, promotions, and questionnaires Fulfilling prizes, offers and promotions Responding to your inquiries and requests
Phone number	Sending SMS messages (if subscribed) Providing registration confirmations Communicating with you, such as when you interact with Oxford's contests, offers, promotions, and questionnaires Fulfilling prizes, offers and promotions Responding to your inquiries and requests
COVID-19 Attestation	Recording your self-reported COVID-19 exposure or symptoms attestation
Communications	Responding to your inquiries and requests Maintaining records of building notices and other communications Oxford has sent you
Use of Oxford content such as: <ul style="list-style-type: none">- building operation notices- building services and amenities- Oxford promoted events, offers, contests- in-app notifications- push notifications	Measuring engagement with Oxford content Tailoring email newsletters and promotions (if subscribed) Tailoring SMS messages (if subscribed) Improving the relevancy of Oxford's offers and services

Aggregated information relating to use of third-party content such as:

- tenant notices
- third party promoted events, offers and contests

Mobile key usage

Measuring engagement with third party content

Improving the relevancy of Oxford's offers and services

Enabling access to building areas

Monitoring access for security purposes

Measuring building traffic

As you use the App you may interact with other services provided by Oxford. These services may collect, use and disclose other information. Please review the privacy notices and explanations when you use these services. You can find more information about privacy and these other services in the [Oxford Privacy Statement](#).

Oxford retains your personal information for as long as is necessary to fulfill the purposes for which Oxford collected it or as may be required to comply with applicable laws. You can find more information about retention in the [Oxford Privacy Statement](#).

Who does Oxford share personal information with?

Oxford does not sell your personal information.

Oxford may share personal information for the following legal or business reasons:

Who Oxford shares with

Lane

Technology service providers

Promotional partners

Merchants, retailers and other providers of goods and services

Event hosts

Tenants, police, and other third parties

Why Oxford shares

Solving technical support requests

Reporting security issues or breaches of Oxford's or Lane's Terms of Use

Hosting and powering Oxford services

Solving technical support requests

Reporting security issues

Assisting Oxford in promoting Oxford's events and services

Jointly promoting an event, product or service

Fulfilling a contest prize, gift or promotion

Facilitating your registration for events

Conducting investigations

Filing police reports, insurance claims

Obtaining legal advice

Responding to emergencies

Enforcing this Privacy Notice, the Oxford Privacy Statement or the App Terms of Use

Affiliates or third-party purchasers of Oxford's business

Corporate group planning and business operations

Completing the sale of Oxford's business, in the event that Oxford sells its business to a third party

Managers

If you are an Oxford or OMERS employee and use the App to communicate with Oxford or OMERS for work-related reasons.

As you use the App you may interact with other services provided by Oxford. These services may collect, use and disclose other information. Please review the privacy notices and explanations when you use these services.

How does Oxford protect personal information?

You have a shared responsibility with Oxford for protecting your personal information.

Oxford's responsibilities:

- require Lane and other service providers to use appropriate technical security measures and policies and procedures to protect your personal information
- use complex passwords and unique user IDs when Oxford accesses information that is stored in Lane's systems
- only allow employees to access what they need to do their jobs
- train employees on privacy and security

Your responsibilities:

- install the latest operating system and patches for your device
- use a complex password for your device's lock screen and a different complex password for the App (complex passwords include capital letters, numbers and special characters)
- do not use the same password for multiple apps
- do not share your password with others
- do not jailbreak your device to remove operating system restrictions

Please see the [Lane Privacy Policy](#) for how Lane protects your personal information.

Where is personal information stored and used?

Oxford's operations are in Canada and the United States. Oxford's main technology service providers are in Canada and the United States. Oxford may also use service providers located in other countries. When your information is transferred outside of the country in which you reside, it will also be subject to the laws of the other jurisdiction. Those laws may be different than the laws where you reside.

How do I exercise my rights?

You have the right to:

- access your personal information
- request corrections to your personal information
- delete personal information that Oxford no longer need to retain

Please use the tools provided in the App to access, correct or delete personal information. If these tools are not sufficient for what you want to access to or what you want to correct or delete, please make your request in writing to:

Oxford Properties Group Privacy Officer
900-100 Adelaide Street West
Toronto, Ontario, Canada M5H 0E2

privacy@oxfordproperties.com

Sometimes Oxford won't grant access to or correct or delete your personal information. If that happens, Oxford will tell you why and what you can do about it if you are not satisfied.

To access personal information collected by Lane, please see the [Lane Privacy Policy](#).