

R I O  C A N

Video Surveillance Policy

Effective as of September 27, 2019

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OVERVIEW

This Policy applies to all overt video surveillance camera recording devices located at RioCan properties. Video surveillance cameras are installed to enhance and maintain safety and security reasons at RioCan properties.

The safety of individuals (employees, tenants, visitors and others) as well as property is protected and maintained at RioCan by means such as, alarm systems, security guards, alert observation by staff and a security-conscious design of the property.

However, the additional protection provided by surveillance cameras is considered to be one of the most effective means of meeting RioCan's legitimate business objectives. These objectives include loss prevention (detering and providing evidence of theft or vandalism), and maintaining a safe and secure environment for all.

This Video Surveillance Policy provides detailed direction concerning the context, procedures and protocols within which RioCan installs and operates surveillance cameras within its properties. The Policy is based on applicable federal and provincial privacy laws, and guidelines set out by Office of the Privacy Commissioner of Canada.

VIDEO SURVEILLANCE SYSTEM IMPLEMENTATION

The following implementation of RioCan's video surveillance system is based on a review of how the collection and recording of images can help RioCan achieve its objectives.

- (a) Given the need to protect individuals, some video surveillance cameras record at all times, while others only record when motion is detected. Cameras are installed to record only video not audio.
- (b) Cameras are installed to monitor only those spaces that have been identified consistent with the business objectives outlined above, such as at a main entrance, in storage, facing doorways and around the external perimeter of the building. External cameras may capture passersby but are focused on the premises and positioned to minimize that possibility as much as reasonably possible, consistent with the business objectives outlined above.
- (c) Recording equipment has strictly controlled access. Limited RioCan authorized personnel and their agents, as appropriate, have access to the equipment containing camera recordings and only on an "as needed" basis in order to comply with their roles and responsibilities.

Approval of the Site Property Manager is required before cameras can be adjusted or manipulated to overlook spaces.

NOTICE OF VIDEO SURVEILLANCE

The following signage is displayed where overt cameras have been installed "THESE PREMISES ARE UNDER SURVEILLANCE FOR SECURITY PURPOSES". This ensures that reasonable and adequate warning is provided that cameras are in operation before entering RioCan's premises.

INTERNAL USE OF VIDEO RECORDINGS

Video recordings generally are viewed by authorized RioCan personnel for certain internal purposes, including:

- a) To ensure the premises remain secure on a day-to-day basis;
- b) To assist in the internal safety or security investigation of a pre-defined occurrence such as a suspected criminal offence or other potential unlawful activity;
- c) To investigate a possible breach of contract;
- d) For training purposes, such as educating a select group of RioCan representatives on identifying suspicious activity;
- e) Other purposes consistent with the business objectives for the use of such recordings;
or
- f) As otherwise deemed appropriate by the authorized RioCan personnel.

Authorized RioCan personnel will be given appropriate training and/or resources to understand their obligations pursuant to this Policy.

DISCLOSURE OF VIDEO RECORDINGS

In the event that an incident captured on camera is determined by RioCan to be potentially illegal, appropriate action will be taken, which may include disclosure of relevant images to law enforcement.

EXTERNAL REQUESTS FOR ACCESS TO VIDEO RECORDINGS

All requests for access of any kind from any external party including police services or an officer of the courts for video recordings must be in writing and forwarded to the RioCan Property Manager for review prior to executing the request. The Property Manager shall, in turn, forward such request to the Chief Privacy Officer for review and response.

If access to a video surveillance record is required for the purpose of a law enforcement or private investigation, the requesting investigator shall be required to specify in writing the location, date, timeframe and any other relevant information regarding the recordings being requested, as well as a description of the investigation being undertaken or the incident of interest.

When providing access to video recordings, RioCan reserves the right to crop out information beyond the requesting individual's right of access, including but not limited to, images of other individuals irrelevant to the request, before providing access to the images, in order to, among other things, respect the privacy of such other individuals. This may require that alternative forms of the record be made available to the requester, such as still images of a recording, to allow for such modifications.

RETENTION OF VIDEO RECORDINGS (RECORDS)

Ordinary course recordings may be stored for up to 90 days. A record of an incident may be stored up to 3 years (from the date of creation) where it may be required as part of a criminal, safety, security or breach of contract investigation, or for training and evidentiary purposes. A record that has been identified as relevant evidence to a legal proceeding (criminal, civil, or regulatory) may be preserved in accordance with RioCan's litigation hold procedures, for as long as the hold is in place. Such recordings shall be saved to a secure file and/or disc and stored in a secure environment until completion of the training, investigation or any relevant proceedings.

DESTRUCTION OF VIDEO RECORDINGS (RECORDS)

Camera recorded images that are used or stored in accordance with this Policy will be completely overwritten or securely destroyed upon expiry of the relevant retention period.

UNAUTHORIZED ACCESS AND/OR DISCLOSURE (PRIVACY BREACH)

Any RioCan employee who becomes aware of an unauthorized use or disclosure of a video record in contravention of this Policy, and/or a potential privacy breach, has a responsibility to ensure that the Chief Privacy Officer is immediately informed of the breach.

The Chief Privacy Officer will take the necessary steps to contain the extent of the privacy breach; investigate the cause of the breach with the goal of eliminating potential future incidents; notify individuals and report the breach to the relevant regulators or authorities, if appropriate or necessary; notify other organizations or government institutions of the breach if this may reduce the risk of harm or mitigate the harm that could result from the breach, as well as document the breach and steps taken to resolve the issue.

Any RioCan employee who accesses or discloses a video record without authorization or in contravention of this Policy may face disciplinary consequences, up to and including termination of employment.

CONTACT INFORMATION

Any concerns about this Policy, or other policies and practices should be directed to:

Chief Privacy Officer
RioCan Real Estate Investment Trust
RioCan Yonge Eglinton Centre
2300 Yonge St., Suite 500, Box 2386
Toronto, Ontario M4P1E4
E-mail: privacy@riocan.com

Version History:

Version	Date	Author(s)	Description
1.0	27-Sep-19	SVP, GC & Corporate Secretary	Initial Release – development of current best practices.