



LCG RESIDENTIAL BUILDERS LTD. WEBSITE PRIVACY POLICY

POLICY STATEMENT

LCG Residential Builders Ltd. (referred to in this Policy as “LCG”, “we”, “us” or “our”) is committed to protecting the privacy of individuals and understands that upholding the trust of the public requires it to be transparent and accountable regarding the collection, use and disclosure of the personal information that comes within its care and control. LCG strives to protect all personal information it acquires and to take precautions to help maintain the security of this data.

WHAT, AND WHO, DOES THIS POLICY APPLY TO?

This Policy applies to LCG’s use, collection and disclosure of personal information acquired from individuals. If your personal information is in LCG’s possession, then this Policy applies to you.

Personal information may be collected by LCG in various situations. You may provide personal information to LCG when you contact us, make inquiries, apply for a job or request our services. We also may acquire your personal information for reasons related to us performing our business.

This Policy does not apply to personal information of LCG employees collected in the course of their employment.

YOUR CONSENT

You are not required to provide personal information. Rather, it is provided with consent, and it is on the legal basis of consent that personal information is gathered by LCG. Consent to LCG’s collection, use and disclosure of your personal information may be provided in several ways. It may be expressly provided, for example in a written consent form, or it may be implied, for example when you provide information voluntarily when dealing with or requesting services from us. When you provide your personal information to us, through your use of our website or otherwise, your consent to our collection, use and disclosure of your personal information as described in this Policy or as otherwise described to you at the time the information is collected, is assumed. For personal information received by us from a third party, such as a client of ours which provides the personal information to allow us to perform the services for which we were engaged by the client, consent for the purpose for which we receive the information is assumed. Your consent is considered to be ongoing. Nonetheless you may withdraw your consent at any time.



However, a withdrawal of consent may affect your ability to receive, and may affect our ability to provide, responses, information, products or services. Through your use of our website, you also agree to be bound by LCG's Website Terms and Conditions (which are also publicly available for review on our website). If you do not agree with this Policy or LCG's Website Terms and Conditions, please do not use our website.

PERSONAL INFORMATION COLLECTED

Whether information is personal depends on the context and applicable law, but may include,

- ▶ Names, addresses, telephone numbers and other contact information
- ▶ Employment history, education information and other information provided through job applications
- ▶ Other personal information provided to LCG through our website (for example, through the "Contact Us" form, the "Subcontractor and Supplier Registration" form, the "Donation Request" form, or through the creation of an account)

LCG also receives and records certain Internet or other electronic network activity information through your use of our website, including computer IP addresses and domain names, the date of your visit to our website and "cookie" information. You may configure your Internet browser software to disable cookies, though your ability to access some web pages may be affected. The information collected in relation to your activity on our website is subject to analysis in aggregate form, meaning it is compiled in a manner which does not contain personal information. This information is used to enable us to better manage our website and its contents, to diagnose any technical problems and to improve our marketing and promotional efforts.

This website is not designed for or targeted to individuals under the age of 16, nor do we knowingly receive or process the personal information of children under the age of 16. Any such personal information knowingly received by us will be deleted.

USE OF PERSONAL INFORMATION

Personal information may be used by LCG for the following purposes, without limitation:

- ▶ Registering and recording you as a potential or actual customer or client of ours
- ▶ Compiling lists of individuals who have registered or inquired to receive information from us
- ▶ Communicating with you with respect to inquiries made or services provided by us
- ▶ Sending you information or news which you have requested or subscribed to
- ▶ Generating and managing account information and confirming access to accounts and software
- ▶ Performing job application activities and determining eligibility for employment opportunities
- ▶ Determining eligibility for sponsorships or donations
- ▶ Verifying suitability of subcontractors or suppliers for work opportunities with us
- ▶ Conducting market research
- ▶ Marketing services and products provided by us, as allowable and as consented to by you
- ▶ Optimizing the functionality of, and your experience on, our website



- ▶ Improving the services and products provided by us
- ▶ Performing under an agreement you or another party may have with us
- ▶ Verifying your identity and protecting against fraud and other unlawful activity
- ▶ Complying with applicable laws
- ▶ Otherwise for the purpose consented by you or as allowable under applicable law

LCG does not conduct profiling or automated decision making with personal information.

Access to personal information within LCG is limited to employees and contractors who require it for the fulfillment of their roles and responsibilities. These may, depending on the purpose for which the information was collected, include communications, marketing, human resources, information technology, operations or other personnel. Only the minimum amount of information required for a particular purpose is provided or accessible, and every employee and contractor is required to be bound by confidentiality obligations covering information used in our business.

STORAGE AND DISCLOSURE OF PERSONAL INFORMATION

Personal information will only be kept by LCG for the period of time necessary to fulfill the purpose for which it was collected or as required for other legal purposes. Our information retention practices are intended to apply the minimum time periods necessary for retention, based on categories of data we customarily deal with and within which personal information may exist.

Personal information may be used, processed or stored in Canada, the UK or the US. Once the information is no longer needed, it will be deleted or destroyed in accordance with our document retention and destruction policies.

LCG uses reasonable measures to ensure personal information is safeguarded to prevent unauthorized access, use and disclosure. These include:

- administrative measures such as employee privacy training, our document retention and destruction policies and limits on access to personal information to those who require it
- technical measures such as password requirements for computer system access, network firewalls and regular updates to security software
- physical measures such as restricted access to our facilities and offices, locked server rooms and secure storage for physical documents

Despite our continuing efforts to ensure our security is effective, data storage and internet transmission are not guaranteed to be completely secure.

LCG does not disclose personal information unless it is necessary to do so for the purpose for which it has been collected. We may transfer personal information to outside agents or service providers that perform services on our behalf, such as professional advisors, data processing service provider, information technology service providers or other technical service providers. We will only disclose personal information to the extent necessary to allow the services to be performed. We do not sell personal information.



LCG may be required or permitted under applicable laws to collect, use or disclose personal information, for example to comply with a court order, to comply with an inquiry by a government agency or to prosecute or defend our interests in legal proceedings. We will disclose personal information only to the extent we are required to.

YOUR RIGHTS

As stated above, you have the right to withdraw your consent to LCG's use of your personal information. Additionally, depending on applicable laws and in certain circumstances, you may have the following rights related to your personal information collected by us:

- ▶ To request a copy of your personal information
- ▶ To request deletion of your personal information
- ▶ To object to our use of your personal information
- ▶ To request that our use of your personal information be restricted
- ▶ To request corrections to your personal information if it contains errors
- ▶ To request a transfer of your personal information to another party for its use
- ▶ To opt out of any marketing which may involve your personal information (for example, unsubscribing from email communications)
- ▶ To not be discriminated against for exercising your rights
- ▶ To complain to applicable privacy regulatory bodies

You may exercise your rights by contacting us as set out below in the "Links, Updates and Contact" section. The exercise of your rights may, however, affect our ability to provide responses, information, products or services.

LINKS, UPDATES AND CONTACT

LCG is not responsible or liable for the content or privacy policies of third-party websites found on this website, linked from this website or on websites that link to our website. You are encouraged to review the privacy policies of other sites you visit or use.

This Policy may be updated by us from time to time and you are encouraged to review this Policy regularly in the event changes are made. We commit to reviewing this Policy at least annually. This Policy was last updated November, 2025.

For information, questions or requests in relation to this Policy or in relation to LCG's management of personal information generally, please contact LCG's Privacy Officer at the address set out below. We may request that you provide us with information to verify your identity, although personal information collected to determine your identity or whether your request is a verifiable request will not be used for any other purpose.



Privacy Officer
LCG Residential Builders Ltd.
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Toronto, ON, M9W 1A2

Email: privacyofficer@lcgresidential.ca

LCG commits to reviewing the policy annually.