

Privacy statement for the customer and direct marketing data file

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1. Controller

Asuntosäätiö sr (0101242-5)
Tuulikuja 2, 02100 Espoo
Tel. +358 20 161 2400

(hereinafter "we")

2. Contact person in matters concerning the registers

Niina Savikko
Data Protection Officer
Tuulikuja 2, 02100 Espoo
tietosuoja@asuntosaaio.fi

3. Content of the registers

The customer register comprises the following personal data files:

- Register of applicants for a right-of-occupancy apartment
- Register of applicants for a rental apartment
- Register of agreements; parties to agreements on right-of-occupancy and rental apartments
- Register of applicants for a part-ownership apartment
- Register of shareholders; holders of part-ownership apartments
- Register of advance reservation agreements; persons who have reserved shares in new properties
- List of purchasers of shares; buyers of owner-occupied apartments
- Register of residents; persons living in right-of-occupancy and rental apartments
- Register of holders of golf playing rights

The direct marketing register comprises the following sub-registers:

- Register of newsletter subscribers
- Direct marketing register for marketing golf playing rights
- Mailing list for information on new properties

4. What are the purpose of and legal basis for the processing of personal data?

The purposes of the processing of personal data in the customer and direct marketing registers are:

- rental and sale of apartments and business premises
- customer relationship management
- fulfilment of our contractual and other promises and obligations
- rent and residence charge administration
- collection of receivables arising from a rental or right-of-occupancy agreement
- termination of a rental or right-of occupancy agreement
- implementation of resident administration
- apartment and property maintenance
- key management and the prevention and investigation of
- possible crimes/vandalism/misuse at properties
- processing of the received feedback and provision of customer service
- marketing and advertising
- customer communication, such as sending newsletters
- carrying out opinion polls, market research and marketing campaigns
- monitoring communication on our social media channels in general in order to develop our services and provide customer service
- organising customer events and any related invoicing and collection

The basis for the processing of personal data is our legitimate interest based on a customer relationship and/or other appropriate connection, the performance of an agreement and consent.

The purpose of the register of holders of golf playing rights is to reconcile the use of golf shares and to market playing rights. In addition, personal data are collected for sending the newsletter.

The customer can register in the direct marketing register used for marketing playing rights in order to obtain information on the start of the sale of playing rights.

5. What information do we process?

In connection with the customer registers, we process the following information about applicants for an apartment, buyers, co-applicants, tenants, holders of the right of occupancy, shareholders, persons who have reserved an apartment in advance, co-payers, other persons moving in, users of websites for residents and persons who have submitted a fault report (the

information marked with an asterisk is required for the establishment of a contractual relationship):

- **information of the applicant/holder/buyer of the apartment**, such as name*, personal identity code*, travel document identifier such as passport number in the absence of a personal identity code*, address, telephone number, email address, customer number, right-of-occupancy queue number*, date/city of issue of the queue number, start date of the customer relationship, information on trusteeship, employment, duration and type of employment, information on income and assets, credit report, information on current apartment, marital status, agreement details, payment information on rent/residence charge, information on security deposit for rent/residence charge, possible vehicle registration number, contact details and participation in activities/competitions organised by Asuntosäätiö;
- **information of a possible co-applicant** such as name*, personal identity code*, travel document identifier such as passport number in the absence of a personal identity code, address, telephone number, email address, customer number, start date of the customer relationship, information on trusteeship, employment, duration and type of employment, marital status, information on income and assets, credit report, information on current apartment, agreement details, payment information on rent/residence charge, information on security deposit, contact details and participation in activities organised by Asuntosäätiö;
- **information in share and shareholder lists**, such as the shareholder's name, address, language, nominee register information, type of book-entry security, and number and percentage of shares held;
- **information of possible other persons moving in**, such as name, date of birth, address, telephone number, email address;
- **registration information of registered users of our online service**, such as user ID and password, as well as any other identifier;
- **email addresses of subscribers to our newsletters**;
- **information concerning the customer relationship and agreement**, such as the user profile created on the basis of the customer relationship, the exchange of messages with the customer/data subject and other contacts, phone call recordings
- **cookies and information related to their use** (more information on the website);
- **log data stored on the use of systems**;

- **information concerning the communication link and the device used**, such as IP address and cookie information;
- **information on fault reports**, such as the name of the person submitting the report, address, description of the fault report and other information provided in connection with the report;
- **key management information**, such as the name, address and other possible contact details of the key holder, key handover and return dates, as well as door access data from properties, such as key identification information, date and time;
- any **access control data from apartments** equipped with an electronic locking system and any access control data that may be recorded from other premises
- any **camera surveillance recordings** from properties with such surveillance;
- **measurements of apartment** conditions in apartments with systems for measuring the conditions;
- **any profiling and interest information provided by the data subject**;
- **any authorisations, consents and marketing bans**; and
- **any other information necessary for the customer relationship that has been collected with the consent of the data subject**;
- **information collected for the sale of golf playing rights, stock reconciliation and marketing**, the person's name, date of birth, telephone number, email address, home club, membership number and personal handicap (HCP).

Photos taken of people at events organised by Asuntosäätiö or in its office may be used in publications within the law.

6. Where do we obtain information from?

As a rule, information is collected from the person themselves, e.g. from an apartment application, in connection with the conclusion of an agreement, from a subscription to the newsletter, from an advance reservation notice, from the list of holders of golf playing rights, in connection with the purchase of playing rights and from electronic services.

Personal data can also be collected and updated using information from the controller's other personal data files, customers terminating their agreement/giving up their apartment, the controller's partners and authorities and companies providing services related to personal data, such as the Digital and Population Data Services Agency, Posti, the credit register of Suomen Asiakastieto Oy for credit reports and KELA for information on the resident's housing allowance.

Access control data and camera recordings can be recorded from any apartment/premise equipped with an electronic locking system and surveillance.

We obtain any information collected for managing the use of information systems from the customer themselves.

Log data are automatically stored when using information systems. IP address and cookie information is collected in connection with the use of the website and extranet and application editing.

7. To whom do we disclose and transfer data, and do we transfer data outside the EU or the EEA?

As a rule, we do not disclose the contact details we have collected without the consent of the customer, unless otherwise required by law or the preparation, presentation or defence of a legal claim. With regard to active residents, the information of the resident members of the board of Asokodit, the members of the development working group and the chairpersons of the residents' committees is published on the property's website for residents or notice board, unless they have specifically prohibited it.

We use subcontractors acting on our behalf in the processing of personal data. For example, we have outsourced the following tasks to our subcontractors:

- management of our customer relationships and services
- maintaining and supplementing our customer data
- sale and rental of apartments or other premises
- property management, maintenance, construction, repairs and safety monitoring
- customer support in the Help Centre; e.g. receiving fault reports
- orders for apartment keys and key storage
- collection activities
- activities related to the development of our information systems

We have taken care of protecting your data with our subcontractors by drawing up processing agreements regarding the processing of personal data, which, in accordance with the EU General Data Protection Regulation, agree on, for example, the level of data security, confidentiality obligations and reporting of data breaches between Asuntosäätiö and the contracting party.

We only disclose personal data to the extent permitted and required by applicable legislation.

In the case of ARA rental and right-of-occupancy apartments, the Housing Finance and Development Centre of Finland and in the case of Hitas apartments, the City of Helsinki act as supervisory authorities, which have the right to receive the information they need for supervision. In addition, information may be disclosed to the City of Helsinki for the purpose of performing Hitas apartment draws. All right-of-occupancy residents are approved by the authority of each city, which has the right to receive the information necessary for approval. In addition, information related to the offer round is provided to the same authority.

KELA is entitled to receive information about the recipients of its allowances.

If Asuntosäätiö rents, sells or transfers the ownership of a building to another company, the up-to-date information of its residents will be disclosed to the new owner of the building.

We notify Pickala Golf of the holders of playing rights and shares.

As a rule, we do not transfer personal data outside the EU or the EEA. If personal data are processed outside the EU or the EEA, we ensure that the subcontractor is committed to the EU Commission's model clauses on the processing of personal data.

8. How do we protect your information and how long do we keep it?

The information in the register is confidential. Personal data may only be processed for a predefined purpose and by persons performing tasks related to them only to the extent required by the work tasks. This is ensured by controlling access rights. Employees who process data are bound by the obligation of secrecy, which continues after the termination of their employment.

The ERP systems are located on the server equipment in the service provider's service centre. All traffic is always encrypted with strong encryption methods.

The disk system on Asuntosäätiö's server can only be accessed in a secure internal network or via a secure remote connection.

The use of the systems requires a personal user ID and password. In order to obtain user IDs, the employee undertakes to comply with Asuntosäätiö's data protection principles. Access rights are restricted to work tasks only. Managers decide on granting and withdrawing access rights and sign the requests for access rights. Access rights will expire when the person leaves the tasks for which they were granted. Access rights are granted in accordance with the user's task and are based on user roles that have been assigned the right to perform actions according to the task. The rights to read, write and erase data are defined separately for different user roles.

We strive to ensure that, within the framework of the available technology, the systems register all logins and processing and viewing of data performed in the systems in the log data.

Manual documents are stored at employees' workstations and in locked archive facilities.

The storage, archiving and destruction of personal data are determined by legislation and the principles and guidelines of the operating process based on it. We regularly assess the necessity of data retention, taking into account the applicable legislation. In addition, we take reasonable steps to ensure that no personal data that are incompatible, outdated or inaccurate in relation to the purposes of the processing are stored in the register. We will rectify or erase such data without delay.

9. What are your rights as a data subject?

The data subject has the right to review the data concerning them in the register. The request to access the processed data is submitted to Asuntosäätiö's data protection officer. The information requested will be provided in writing and we aim to provide it without delay, at least within a maximum period of 30 days. If the right of access is exceptionally denied, the customer will be given a written reply. The decision states the reasons why the right of access was denied. The data subject may refer the matter to the Data Protection Ombudsman.

Insofar as the data subject has themselves submitted information to the customer register, which is automatically processed based on consent or a mandate, the data subject has the right to obtain such information for themselves, as a rule, in machine-readable form and the right to transfer this information to another data controller.

If inaccurate, unnecessary, incomplete or outdated information is detected in the register, we will rectify it on our own initiative or at the request of the data subject. To request the rectification of data, please contact our customer service. If the request for the rectification of data is refused, the data subject concerned will be provided with a certificate of refusal stating the reasons why the request was refused. The person will be informed of their right to refer the matter to the Data Protection Ombudsman.

Insofar as the processing is based on consent, the data subject also has the right to withdraw or change their consent at any time. Withdrawal of consent does not affect the legality of the processing that has taken place prior to the withdrawal of consent.

The data subject has the right to object to or request the restriction of the processing of data. For special personal reasons, the data subject also has the right to object to processing actions directed at them when the basis for processing the data is a legitimate interest. The request must specify the special situation on the basis of which the processing is objected. We can only refuse to comply with a request for objection on the grounds provided for by law.

The data subject has the right to lodge a complaint with the supervisory authority if the data subject considers that the processing of personal data concerning them is in breach of the EU General Data Protection Regulation or national laws and regulations governing data protection.

Contact details of the supervisory authority:

Office of the Data Protection Ombudsman
Postal address: P.O. Box 800 00531 Helsinki
Visiting address: Lintulahdenkuja 4, 00530 Helsinki
tel. +358 29 566 6700
tietosuoja@om.fi

10. Who can you contact?

All contacts and requests regarding this statement must be made in writing to the contact person named in section two (2).