

Privacy notice of LocalTapiola Real Estate Asset Management Ltd and LocalTapiola Alternative Investment Funds Ltd

This privacy notice describes what data are saved in LocalTapiola Real Estate Asset Management Ltd and LocalTapiola Alternative Investment Funds Ltd's data file, the purposes for which the data are used, how the data are protected, and where the data subjects can get more information with regard to their personal data.

1. Controllers

LocalTapiola Real Estate Asset Management Ltd
Revontulenkuja 1
02010 LÄHITAPIOLA

and

LocalTapiola Alternative Investment Funds Ltd
Revontulenkuja 1
02010 LÄHITAPIOLA

2. Data Protection Officer's contact details

For more information on personal data and the processing of personal data, contact LocalTapiola Group's Data Protection Officer. In addition, LocalTapiola's website www.lahitapiola.fi provides information on the principles governing the processing of personal data at LocalTapiola Group as a whole.

By email: tietosuoja@lahitapiola.fi
By mail: LocalTapiola Group
Legal & Compliance / Data Protection Officer
Revontulenkuja 1
02010 LÄHITAPIOLA

3. Purposes of and legal grounds for the processing of personal data

Data subjects' personal data are processed in accordance with the EU's General Data Protection Regulation (hereinafter 'the Data Protection Regulation'), Finnish data protection legislation and all other applicable provisions.

Purposes of the processing

The personal data are used for Real Estate Asset Management's rental and leasing business and investment business and for the funds business of Alternative Investment Funds. The data are needed for the execution and targeting of transactions, for customer service and customer communications, for risk management and to fulfil the necessary regulatory requirements. Additionally, the data are also used for the marketing, use monitoring and analysis of, and to compile statistics on the use of, LocalTapiola Group's services and products, as well as for the development of products and services, for ensuring the security of the services, and for the investigation of abuses.

Profiling

The processing of personal data may involve profiling. Profiling is employed in tasks such as the targeting of marketing efforts in order for the products and services marketed to meet customers' needs.

For general information on profiling, visit LocalTapiola's website www.lahitapiola.fi/henkilotietojenkasittely.

Customer due diligence, and prevention of money laundering and countering of terrorist financing

The customer due diligence data, the due diligence data on other related business partners or counterparties and the data subjects' other personal data may be used to prevent, counter, expose and investigate money laundering and terrorist financing, and to initiate investigations of money laundering and terrorist financing and of criminal offences committed to obtain any property or proceeds of crime that are subject to money laundering or terrorist financing.

A data subject's personal data may be used to investigate whether any of the international sanctions with which the controller complies apply to the data subject.

Legal grounds for the processing

In the main, LocalTapiola processes the data subjects' personal data on the basis of the relevant contractual relationship and the measures that precede the conclusion of a contract.

Personal data may also be processed on the basis of:

- a data subject's consent, such as consent to execute electronic direct marketing;
- the controller's statutory obligations, such as the obligations laid down in tax legislation;
- the controller's legitimate interests, such as use of the data for direct marketing, provided that the data subject is aware of this and has not prohibited this. Usually, the controller's legitimate interest is founded on a customer relationship between the controller and a data subject, or a comparable relationship.

4. Registered groups of persons

- Any persons who are or who have been in a customer relationship or some other business relationship with Real Estate Asset Management or Alternative Investment Funds (customers and other business partners)
- Potential customers and business partners
- Any persons linked to the customer, to some other business partner or to a potential customer or business partner, such as trustees, agents or other representatives.

5. Personal data stored in the data file

- The basic data on customers and other business partners
- The basic data on potential customers and other business partners
- The basic data on persons linked to the customer, other business partner, or potential customer or business partner, including:
 - name, contact details
 - personal identity code or date of birth
- The necessary identification and classification data concerning customers, other business partners, and potential customers and business partners, including:
 - an explanation of the source of the funds
 - data on financial position
 - reasons for executing a transaction or using a service
 - any political influence
 - beneficial owners
 - ownership data
- The customer (investor customer) tax liability data

- The customer (tenant customer) transaction data, including:
 - banking details, including contact details, bank account, and payment reference data
 - indication of the services selected by the customer
 - orders, transactions and meetings completed
 - payment data, including rent paid and payments made
- The basic lease data
- The complaint and appeal data, including:
 - unique complaint identification data
 - unique identification data of decisions by appeal bodies
 - documents and other materials relating to complaints or appeals
- The customer communications data, including:
 - customer letters and newsletters
 - chat conversations
 - telephone recordings
 - online messages.

6. Regular sources of data, and disclosure of personal data

In the main, all data are obtained directly from the data subjects, parties authorised by the data subjects, registers maintained by public authorities, and the credit register.

Personal data may be disclosed within LocalTapiola Group insofar as permitted under the law.

Personal data are disclosed to parties external to LocalTapiola Group only with the data subject's consent or whenever there is a specific legal ground for the disclosure of data.

7. Transfer of personal data outside the European Union or the European Economic Area

Personal data may be transferred outside the EU or the EEA insofar as data protection legislation permits.

Some external service providers or other recipients of personal data may be located, or they may process personal data, outside the EU or the EEA. LocalTapiola employs the necessary transfer mechanisms available in legislation to ensure that the level of the protection of personal data is not compromised in cases where they are transferred outside the EU or the EEA. Such transfer mechanisms include the European Commission's equivalence decisions and the conclusion of standard clauses with any recipient of data located outside the EU or the EEA.

8. Retention period of personal data

LocalTapiola Group determines the retention periods of personal data with due consideration of the requirements set in the applicable legislation and the smooth operation of business. The purpose of the retention periods is to safeguard the data subjects' and LocalTapiola's rights.

The retention periods of data subjects' personal data vary according to the type of transactions they conduct or have conducted. For instance, as a general rule, lease and tenancy data must be kept for a period of 10 years from the date of contract termination or from the date of discharging the related obligations.

9. Principles for the protection of personal data

In the protection of personal data, we use the necessary technical and organisational means that are aligned with best practices, including:

- limitation and management of access rights
- registration of personal data processing operations
- training of and provision of instructions to personnel
- various encryption and protection techniques
- monitoring of cyber security
- firewalls, and differentiation of environments
- ensuring the security of facilities
- access control.

LocalTapiola Group also requires that the subcontractors it uses ensure the appropriate protection of the personal data processed, and the activity of subcontractors is inspected and audited where necessary.

10. Data subject's rights

Withdrawal of consent

Where the processing of personal data is based on a data subject's consent, the data subject has the right to withdraw their consent to process their data. Such withdrawal has no impact on any processing that has taken place before the withdrawal.

Right of access

A data subject has the right to obtain confirmation as to whether or not their personal data are being processed, as well as enjoying the right to be given a copy of their data.

Right to rectification

A data subject has the right to demand rectification of all inaccurate or incomplete data.

Right of erasure

A data subject has the right to request erasure of their personal data.

Other rights

A data subject has the right to object to the processing of their data for the purposes of direct marketing and direct marketing-related profiling. Under some circumstances, a data subject has the right to request restriction of the processing of their personal data, or to otherwise object to the processing of their personal data. In addition, the data subjects may request the transfer, in a machine-readable format, of the data they themselves have submitted, if technically feasible.

The data subjects may exercise their rights using the contact details provided under Section 2 or some other contact details communicated for this purpose.

Where a data subject finds that the processing of their personal data is not lawful, they may lodge a complaint with the relevant supervisory authority.

