

Privacy notice of the investment business carried on by LocalTapiola Group's real estate and other alternative investments

This privacy notice describes what data are saved in LocalTapiola Group's investor data file, and it outlines the purposes for which the data are used, how the data are protected, and where the data subject can get more information with regard to their personal data.

1. Controllers

LocalTapiola Group
Revontulenkuja 1
FI-02010 LÄHITAPIOLA

The controllers are the following companies part of LocalTapiola Group:

1. Seligson & Co Fund Management Company Plc
2. LocalTapiola Real Estate Asset Management Ltd
3. The LocalTapiola regional companies.

The following are also controllers: the alternative investment funds administered by Seligson & Co Fund Management Company Plc and structures administered by LocalTapiola Real Estate Asset Management Ltd, or structures which the foregoing entities own.

For more information about LocalTapiola Group, visit the LocalTapiola website www.lahitapiola.fi.

2. Data Protection Officer's contact details

For more information about personal data and the processing of personal data, contact LocalTapiola Group's Data Protection Officer. In addition, the LocalTapiola 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
FI-02010 LÄHITAPIOLA

3. Purposes of the processing of personal data, and the basis for the processing

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

Purposes of the processing

Personal data are used for the real estate investment business related to the business operations of the following entities: Seligson & Co Fund Management Company; the alternative investment funds which it manages; and Real Estate Asset Management. The data are also used for the purpose of trading carried on by the alternative investment funds that Seligson & Co Fund Management Company administers and by the co-investment structures managed by Real Estate Asset Management, and for the purpose of trading in property related to the real estate investment carried on by certain LocalTapiola Group insurance companies.

The data are needed for the execution and targeting of transactions, and for customer service and customer communications, reporting, risk management and to fulfil the necessary regulatory requirements. Furthermore, 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 product and service development and for ensuring the quality and security of the services and investigating abuses.

Profiling

The processing of personal data may involve profiling. Profiling is used, for example, in the targeting of marketing efforts in order for the products and services marketed to meet customers' needs.

For general information on profiling, visit the LocalTapiola 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 business partners or counterparties and the data subject's other personal data may be used for preventing, countering, exposing and investigating money laundering and terrorist financing, and for initiating 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.

The data subject's personal data may be used for investigating whether any of the sanctions or asset freeze decisions with which the controller complies apply to the data subject.

The basis for the processing

In the main, LocalTapiola processes the data subject's personal data on the basis of contractual relationship and pre-contractual measures.

Personal data may also be processed on the basis of:

- the data subject's consent, including consent to execute electronic direct marketing;
- the controller's statutory obligations, including the obligations laid down in tax legislation;
- the controller's legitimate interests, including the use of 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 the customer relationship between the controller and the data subject, or on a comparable relationship.

4. Registered groups of persons

- The persons who have or who have had a real estate investment business-related customer relationship with Real Estate Asset Management, Seligson & Co Fund Management Company or an alternative investment fund which it administers (investor clients)
- The parties selling real estate investment-related property to, or buying such property from, alternative investment funds administered by Seligson & Co Fund Management Company, to/from co-investment structures administered by Real Estate Asset Management or to/from structures that they own, and to/from certain LocalTapiola Group insurance companies (buyers and sellers)
- Potential investor clients as well as potential buyers and sellers

- The persons linked to investor clients, buyers and sellers, underlying funds, potential investor clients or buyers and sellers or underlying funds, including trustees, agents or other representatives as well as persons acting on behalf of entities or firms (representatives and agents).

5. Personal data stored in the data file

- The basic data on the investor client, including:
 - name, contact details
 - personal identity code or date of birth
- The basic data on the buyers and sellers, including:
 - name, contact details
 - personal identity code or date of birth
- The basic data on the potential investor client, including:
 - name, contact details
- The basic data on the potential buyer and seller, including:
 - name, contact details
 - personal identity code or date of birth
- The basic data on the representatives and agents, including:
 - name, contact details
 - personal identity code or date of birth
- The data on the investor client and potential investor client, and on buyers and sellers or potential buyers and sellers, that are needed for identification and classification, 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
 - professionalism-related data
- Investor client tax liability data
- The complaint and appeal data, including:
 - unique identification data
 - unique identification data of decisions issued by the appeal or dispute settlement body
 - documents and other materials related to the complaint or appeal
- The customer communication 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, data are obtained directly from the data subject, from parties authorised by the data subject and from registers maintained by public authorities.

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 permitted by data protection legislation.

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. Storage period of personal data

LocalTapiola Group determines the periods for which personal data are stored with due consideration of the requirements laid down in applicable legislation and of the smooth operation of business. The purpose of the storage periods is to safeguard the data subjects' and LocalTapiola's rights.

The period for which the data subject's personal data are stored varies according to the type of transactions which the data subject conducts or has conducted. For instance, investor clients' data are, as a general rule, stored for 10 years from the termination of the client relationship.

9. Principles for the protection of personal data

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

- Access rights limitations and management
- Registration of personal data processing operations

- Training of and the provision of instructions to personnel
- Various encryption and protection techniques
- Monitoring of cyber security
- Firewalls, and the differentiation of environments
- Ensuring the security of facilities
- Access control.

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

10. The data subject's rights

Withdrawal of consent

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

Right of access

The data subject has a right to obtain confirmation as to whether or not their personal data are being processed, and they enjoy the right to be given a copy of their data.

Right to rectification

The data subject has a right to demand rectification of all inaccurate or incomplete data.

Right of erasure

The data subject has a right to request erasure of their personal data.

Other rights

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

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

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

