

Privacy notice for LocalTapiola Group's letting business

This privacy notice describes what data are saved in LocalTapiola Group's letting-business 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
Revontulenkujä 1
FI-02010 LÄHITAPIOLA

The LocalTapiola Group insurance companies as well as funds and structures administered by LocalTapiola Real Estate Asset Management Ltd and LocalTapiola Alternative Investment Funds Ltd, or structures which the foregoing own, act as the controllers for the sites they let from time to time.

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

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, 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
Revontulenkujä 1
FI-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

Personal data are used for the carrying on of the letting business of the LocalTapiola Group insurance companies and of funds and structures which Real Estate Asset Management and Alternative Investment Funds administer.

The data are used for the management of leases, for related customer service and communications, for opinion and market polls, 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 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 related partners or counterparties and the data subject's other personal data may be used for the prevention, countering, exposure and investigation of 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.

Legal grounds for the processing

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

Personal data may also be processed on the basis of:

- the 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 the data subject, or on a comparable relationship.

4. Registered groups of persons

- The persons who have or who have had a customer relationship in the letting business carried on by a LocalTapiola Group insurance company or by a fund or structure which Real Estate Asset Management or Alternative Investment Funds administers (lessee customers)
- Potential lessee customers
- The persons linked to the lessee customer or potential lessee customer, such as trustees, agents or other representatives.

5. Personal data stored in the data file

- The basic data on the lessee customer, potential lessee customer or persons linked to the lessee customer or potential lessee customer, such as:
 - name, contact details and language of communication
 - personal identity code or date of birth
 - credit history
- The data on the lessee customer or potential lessee customer that are needed for identification and classification, such as:
 - 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 lessee customer transaction data, including:
 - banking details, including contact details, bank account, and payment reference data
 - an indication of the services selected by the customer
 - orders, transactions and meetings completed
 - payment data, including rent paid and payments made
 - security deposits received
- Basic lease data
- The complaint and appeal data, including:
 - unique complaint identification data
 - unique identification data of decisions issued by the appeal body
 - documents and other materials relating to the complaint or appeal
- The customer communications data, such as:
 - messages in which the data subject is a party

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

In the main, all data are obtained directly from the data subject, from parties authorised by the data subject, from registers maintained by authorities and from 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. Personal data may be disclosed for example if the controller sells a building, a real estate company or a limited liability housing company to a third party.

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 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 the data subject conducts or has conducted. As a general rule, lease and tenancy data are stored for the following six years after the contract termination year or the year in which the last payment was received. The data of potential customers for whom no lease is concluded are erased within three months of reception of the latest lease application.

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

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

Data subjects have 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

Data subjects have a right to demand rectification of all inaccurate or incomplete data.

Right of erasure

Data subjects have a right to request erasure of their personal data.

Other rights

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

Data subjects 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.

