

# Privacy notice of 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  
Revontulenkuja 1  
FI-02010 LÄHITAPIOLA

For the sites that they let from time to time, the controllers are: the LocalTapiola Group insurance companies; the structures managed by LocalTapiola Real Estate Asset Management Ltd; and the alternative investment funds administered by Seligson & Co Fund Management Company Plc; or structures which the foregoing entities own.

For more information about LocalTapiola Group, visit the LocalTapiola website [www.lahitapiola.fi](http://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](http://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](mailto: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 purposes of the letting business carried on by the following entities: the LocalTapiola Group insurance companies; the structures administered by Real Estate Asset Management; and the alternative investment funds managed by Seligson & Co Fund Management Company.

The data are used for tenancy management, related customer service and communication, opinion and market polls, 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 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](http://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 customer relationship in the letting business carried on by a LocalTapiola Group insurance company, a structure administered by Real Estate Asset Management or an alternative investment fund managed by Seligson & Co Fund Management Company (lessee clients)
- Potential lessee clients
- The persons linked to the lessee client or potential lessee client, including trustees, agents or other representatives.

## **5. Personal data stored in the data file**

- The basic data on the lessee client, potential lessee client or persons linked to the lessee client or potential lessee client, including:
  - name, contact details and language of communication
  - personal identity code or date of birth
  - credit history
- The data on the lessee client or potential lessee client 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

- The lessee client transaction data, including:
  - banking details, including contact details, the bank account and payment reference data
  - an indication of the services selected by the client
  - orders, transactions and meetings completed
  - payment data, including rent paid and payments made
  - security deposits received
- Basic lease agreement 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 communication data, including:
  - messages to which the data subject is a party.

## **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, 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 property, 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 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. As a general rule, lease agreement and tenancy data are stored for six years after the contract termination year or the year in which the last payment was received. The data of potential clients for whom no lease is concluded are erased within three months of receipt of the latest lease application.

## 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.

