

PRIVACY POLICY – CUSTOMERS

The purpose of this privacy policy (“**Privacy Policy**”) is to describe how Espoon Asunnot Oy (“**Espoon Asunnot**”) collects, uses and discloses personal data. This Privacy Policy applies to apartment applicants, residents and other customers of Espoon Asunnot (“**Customers**”).

1. CONTROLLER

Espoon Asunnot acts as the controller referred to in data protection laws. Espoon Asunnot is responsible for ensuring that personal data is processed in accordance with this Privacy Policy and valid data protection laws.

The Data Protection Officer and principal contact person is:

Elina Lehtonen, legal counsel
Espoon Asunnot Oy (1565281-0)
Shopping centre Iso Omena
Suomenlahdentie 1, 02230 Espoo
Tel. +358 9 3544 5000
Email: asiakaspalvelu@espoonasunnot.fi

2. LEGAL GROUNDS AND PURPOSE OF THE PROCESSING OF PERSONAL DATA

Espoon Asunnot processes Customers’ personal data regarding ARAVA loan- and interest-subsidised rental apartments (“**ARA Apartments**”) and apartments other than ARA Apartments (“**Non-subsidised Apartments**”) for the purposes described below. ARA Apartments are subject to the Act on the Use, Assignment and Redemption of State-Subsidised Rental Dwellings and Buildings, as well as decrees and regulations issued on the basis of it.

2.1 Selection of residents

Personal data about apartment applicants are processed for the selection of residents. Residents are selected on the grounds of social appropriateness and financial needs. With regard to the selection of residents, the collection and processing of personal data are based on legal obligations and the necessity to take steps prior to entering into a lease agreement.

2.2 Rental relationship

Personal data about residents is processed to take care of rental relationships and related obligations, including, but not limited to, the invoicing and collection of rental receivables and other apartment-related expenses, such as rents for parking spaces and fees for sauna bookings, as well as communication towards residents regarding rental relationships, including upcoming

maintenance and increases in rents. With regard to rental relationships, the collection and processing of personal data are based on legal obligations and the rental agreement between the parties.

2.3 Communication and other notifications

Espoon Asunnot can issue notifications of new apartments and other changes in buildings and apartments by post, via email, by sending text messages or through social media services. Espoon Asunnot does not primarily send direct marketing messages to Customers. Here, the processing of personal data is based on consent given by data subjects and the controller's legitimate interests to provide Customers with information about new apartments, building maintenance and other changes in buildings and apartments.

After being contacted by telephone, Espoon Asunnot can send a text message link to a feedback survey to the contacting person for the development of customer service. Here, the processing of personal data is based on the controller's legitimate interests to develop its customer service by training its personnel through customer service situations. In addition, Espoon Asunnot can send a link to a resident satisfaction survey via email or through a text message for the development of the services that Espoon Asunnot provides for its residents. Here, the processing of personal data is based on the controller's legitimate interests to develop its services by collecting feedback on the services that it provides. Espoon Asunnot can arrange different prize draws and competitions in social media services, participation in which is voluntary and based on the consent of participants.

2.4 Recording customer calls and the use of CCTV systems in customer service areas

Customer service calls are recorded, and the recordings are used to ensure the quality of customer service, verify the content of calls, for example, in conjunction with customer complaints, train customer service employees and develop customer service. Here, the processing of personal data is based on the controller's legitimate interests to investigate unclear customer service situations and customer complaints and to develop customer service by training its personnel through customer service situations.

CCTV systems are used in customer service areas to protect the safety of the personnel and Customers. CCTV systems are targeted at customer service areas in general, not at any individuals. Here, the processing of personal data is based on the controller's legitimate interests to protect the safety of the personnel and Customers.

2.5 Strong electronic authentication

When using strong electronic authentication services, such as an electronic signature, you must disclose the requisite personal details to the provider of the authentication service and adhere to

the service provider's instructions. The service provider acts as the controller with regard to the personal data you supply.

3. PERSONAL DATA COLLECTED

3.1 Necessary data in the apartment application process

- Basic data, such as the name and personal identity code of applicants
- Contact data, such as telephone number, email address, street address
- Data about income, assets and debts
- Data about the current apartment, such as the number of residents, type of housing, floor area and type of control
- Factors affecting the need for an apartment, such as factors related to the family, work or current apartment
- Credit rating

The following data is collected about any other persons living in the same apartment

- Basic data, such as names and personal identity codes
- Income, assets and debts of applicants of at least 18 years (together with the primary applicant)
- Factors affecting the need for an apartment, such as factors related to the family, work or current apartment

The application may include or indirectly disclose sensitive personal data, including:

- Data about the state of health, such as medical certificates
- Data about the need for social or child welfare and its arrangement
- Data about religious beliefs or other belief systems
- Data about sexual orientation

3.2 Necessary data during the rental relationship

The following data is collected during rental relationships:

- Data about the rental agreement
- Changes in living arrangements, including other persons living in the same apartment
- Transfer of keys, parking spaces, sauna and laundry room bookings
- Fault notifications and maintenance
- Complaints and warnings
- Payment defaults, collection and eviction
- Contact by residents

3.3 Other data necessary considering safety and activities

Calls placed by Customers to the customer service are recorded. In this conjunction, the following data is collected:

- Customer service calls, including the name of the caller, the time when the call started, the name of the answering customer service employee, the customer's telephone number (if the caller ID is not hidden), and the duration and topic of the call

Images and videos recorded by CCTV systems are saved.

4. DISCLOSURE OF DATA

Espoon Asunnot can disclose personal data about residents and apartment applicants to third parties in the following situations:

- To the authorities, such as the Social Insurance Institution of Finland, social and child welfare units and the City of Espoo on the basis of laws or as permitted by laws
- To trusted service providers that operate in the name of Espoon Asunnot and that do not have any independent right to use the personal data that Espoon Asunnot discloses to them. For example, the collection of invoiced amounts, IT-support and the maintenance of lists of residents and the management of keys provided by a maintenance company have been outsourced to external service providers.
- When so required by laws, such as in response to a summons or in relation to a legal action
- If Espoon Asunnot is party to a merger or business transaction
- When the disclosure of data is necessary to protect our interests or the safety of you or others, to investigate criminal activities or to respond to official requests.

5. INTERNATIONAL TRANSFER OF DATA

Espoon Asunnot does not process personal data about Customers outside the European Economic Area.

6. RETENTION OF DATA

Espoon Asunnot only retains personal data about Customers for as long as it is necessary for the purposes defined in this Privacy Policy. The retention period is particularly affected by the purpose of using personal data and any legal provisions, on the basis of which Espoon Asunnot is obligated to retain personal data for a specific time. Primary retention periods for personal data are listed below.

Personal data about residents is primarily retained for five (5) years from the end of the lease agreement and, according to the Accounting Act, data related to the payment of rents is primarily

retained for six (6) years, unless Espoon Asunnot has the right or an obligation to retain personal data for a longer period based on applicable laws or a contractual relationship, for example, to collect rental receivables.

Customer call recordings are primarily retained for three (3) days after they have been recorded, and CCTV recordings are primarily retained for fourteen (14) days after they have been recorded, unless it is necessary to retain them for a longer period due to a specific reason related to the purpose of recording.

7. RIGHTS

Customers have the right to access their personal data, have their personal data rectified and updated and request the processing of their personal data to be restricted, as defined in applicable data protection laws. In addition, Customers have the right to request their personal data to be erased. However, any request to have personal data erased means that any related apartment application process in progress will be interrupted, as apartment applications cannot be processed without personal data. In addition, the erasure of personal data during rental relationships is restricted by some personal data being necessary to fulfil rights and obligations related to rental relationships, for example, to maintain contact, send invoices and fulfil the controller's statutory obligations, in which case personal data cannot be erased.

To have your data corrected or removed, you can send a written request to the controller's contact person, whose contact details can be found on the first page in Section 1 'Controller.'

Customers have the right to object to the processing of personal data based on legitimate interests. Customers have the right to restrict the processing of their personal data within the scope of applicable data protection laws.

Furthermore, Customers have the right to obtain their personal data in organised and generally used computer-readable format and to have their personal data transferred to another controller within the scope of and in accordance with applicable data protection laws. This right also applies to personal data provided by a Customer and collected on the basis of the Customer's consent or rental relationship. The right to have personal data transferred does not apply if the processing of personal data is based on laws.

Requests to check personal data must be presented in person at Espoon Asunnot's customer service point/Iso Omena Service Centre during its opening hours. You must verify your identity upon making the request. The request must be in writing and feature sufficient details to identify the person and data in question.

If certain requests are found to be clearly groundless or unreasonable, especially if they are frequent or demand multiple copies of documents, Espoon Asunnot as the controller may charge a reasonable fee based on the administrative costs of fulfilling a request or refuse the request.

Customers have the right to file a complaint with the national supervisory authority if they consider that the processing of their personal data is in breach of the provisions of applicable data protection laws. In Finland, the supervisory authority is the Office of the Data Protection Ombudsman (www.tietosuoja.fi/en/home).

8. PROTECTION OF DATA

Espoon Asunnot uses appropriate technical and organisational information security procedures to protect personal data against deletion, destruction, misuse and unauthorised access. Espoon Asunnot restricts access to personal data only to such employees and assignees that need to have access to personal data in their work-related tasks and to service providers that can only process personal data in accordance with instructions issued by Espoon Asunnot. All persons who can access personal data are obligated to keep all data confidential.

9. CONTACT DETAILS

In questions related to this Privacy Policy or Customers' personal data retained by Espoon Asunnot, Customers can contact the data protection officer of Espoon Asunnot by emailing [**asiakaspalvelu@espoonasunnot.fi**](mailto:asiakaspalvelu@espoonasunnot.fi)