

## Privacy policy – iLOQ S10 locking system

Some Espoon Asunnot properties feature the iLOQ S10 locking system. The purpose of this privacy policy is to describe how Espoon Asunnot collects, uses and discloses personal data collected by the locking system. The personal details accumulated in the locking system form a personal data register.

### 1. Controller

The controller, as specified in the applicable data protection legislation, is Espoon Asunnot. Espoon Asunnot is responsible for ensuring that the personal details are processed in accordance with this privacy policy and the effective data protection legislation.

The following person serves as the data protection officer and primary contact person:

Attorney Elina Lehtonen  
Iso Omena shopping centre  
Suomenlahdentie 1, 02230 Espoo  
tel. +358 9 3544 5000  
e-mail: asiakaspalvelu@espoonasunnot.fi

### 2. Legal basis and purpose of processing personal data

The personal data collected by the locking system is used for the purposes of key management and, as regards the locks of common areas and stairways, to resolve any possible cases of misuse. The grounds for collecting and processing personal data are the tenancy agreement between the parties, the fulfilment of the statutory obligations of Espoon Asunnot (e.g. disclosing information to the police for investigating a suspected offence) and the fulfilment of Espoon Asunnot's legitimate interest.

### 3. Collected personal data

The register includes the following personal data:

- key data
- access rights data
- event log on locking system logins
- programming measures

## 4. Information disclosure

Personal data can be disclosed to third parties in the following cases:

- authorities, such as the police, on the grounds of or as permitted by the law;
- if necessitated by the legislation (e.g. responding to a summons) or in the context of legal proceedings;
- in the event that Espoon Asunnot is involved in a merger or asset acquisition;
- when information disclosure is necessary to safeguard our rights, protect you and others, investigate offenses or respond to requests made by authorities.

## 5. International data transfer

Personal details are not processed outside the European Economic Area.

## 6. Information storage

Personal details are stored only for as long as necessary for fulfilling the purposes specified in this privacy policy. The length of the retaining period is determined based on particulars such as the purpose of using the personal data as well as any legal provisions obliging Espoon Asunnot to store the data for a specific period of time.

iLOQ key cylinders store two hundred (200) of the latest lock opening events in memory in the order of occurrence. The cylinders feature a clock circuit and log the exact date and time of each lock opening event.

## 7. Rights

Data subjects have the right to access any personal data on them, correct and update any of their personal details, request a restriction of data processing or removal of personal data, or object to processing based on legitimate interests, as stipulated in the applicable data protection legislation. Data subjects are also entitled to receive personal data concerning them in a structured and common machine-readable format.

Please send any of the requests listed above by e-mail to [asiakaspalvelu@espoonasunnot.fi](mailto:asiakaspalvelu@espoonasunnot.fi).

## 8. Data protection

The locking system features the appropriate technical and organisational data security measures to protect the personal data against deletion, destruction, misuse and unauthorised access.

The iLOQ 210 system is an electronic locking system. The database on which the register is based is maintained by Fujitsu Services Oy in accordance with the ISO:27001 data protection certificate. The data transfer connections are encrypted.

Access to personal data is restricted to persons who need the information in question in their work. All persons who have access to the personal data are bound by an obligation to secrecy.

## 9. Contact information

If you have any questions related to the privacy policy, please contact Espoon Asunnot's data protection officer by e-mail at [asiakaspalvelu@espoonasunnot.fi](mailto:asiakaspalvelu@espoonasunnot.fi).