

25.5.2018

## CUSTOMER AND TENANCY APPLICANT REGISTERS – PRIVACY POLICY

### Personal data registers

Customer information register  
Tenancy applicant register

### Data controller

Kiinteistö Oy Kajaanin Pietari, Business ID: 0185799-7  
Linnankatu 18, FIN-87100 KAJAANI

### Contact person regarding personal data registers

Ismo Kukkonen, tel +358 (0)8 615 52060 (switch board), ismo.kukkonen [at] kajaaninpietari.fi

### Purpose of personal data and legal basis for processing data

#### *Customer information register*

The information is collected for rental agreements. Personal information data is collected for a specific legal purpose. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

#### *Tenancy applicant register*

The information is collected for tenancy applications. Personal information data is collected for a specific legal purpose. Processing is necessary for compliance with a legal obligation to which the controller is subject (Ara-legislation). Not providing necessary information may prevent the tenancy application processing.

### Personal data contained in registers

#### *Customer information register*

The register includes tenant personal information such as name, contact information and other information necessary in performance of customer relationship.

#### *Tenancy applicant register*

The register includes tenant application personal information such as name, contact information and other necessary information and information provided by the applicant.

25.5.2018

## Regular sources of data

### *Customer information register*

Personal data is collected directly from the data subject.

### *Tenancy applicant register*

Personal data is collected directly from the data subject. The applicant may also provide information of other persons applying for the same apartment, for example spouse or children's information.

## Regular disclosure of data

### *Customer information register*

The personal data may be disclosed to third parties which provide necessary services related to accommodation such as property maintenance partners.

### *Tenancy applicant register*

The personal is disclosed to Ara authorities according to Ara regulation requirements. The applicant information is transferred to customer information register when applicant accepts a rental agreement and becomes a customer.

## Data transfers outside of EEA-area

The data is not transferred outside of European Economic Area (EEA).

## Profiling and automated decision making

The register information is not used for profiling nor automated decision making.

## Duration of personal information storage

### *Customer information register*

The rental agreement information is stored for 6 fiscal years after the end of contract or last debt collected regarding the contract.

### *Tenancy applicant register*

The tenant applicant information is stored according to Ara legislation requirements:

Application type	Storage period
Applications including attachment for applicants who have entered into a contract	5 years counting from accepted agreement
Applications not leading into a contract	5 years counting from the date of the application
The tenant application decisions made by the municipalities	10 years according to instructions from the association of municipalities

25.5.2018

## Rights of the data subject

The data subject has the right to check and rectify the personal data stored about them. The data subject has the right demand the controller to delete or cease processing of personal information if there are no legal grounds for processing. The data subject has the right to oppose and restrict data processing and profiling.

The data subject has the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on contract and the processing is carried out by automated means.

The data subject has the right to make a complaint to an authority if it deems its data to have been processed in a manner that breaches this privacy policy and valid legislation.