

Privacy policy of the key register

1. Controller

Turku Student Village Foundation (hereinafter referred to as TYS)
business ID: FI01423486
Inspehtorinkatu 12A
20540 Turku, Finland
Tel. +358 (0)2 2750 200

2. Person in charge of register matters

Tuula Kanervisto/Data protection officer
Inspehtorinkatu 12A
20540 Turku, Finland
Tel. +358 (0)2 2750 200
tietosuoja@tys.fi

3. Register name

Key register

4. Purpose of processing personal data

Managing keys, key loans and access rights, protecting the tenants and properties as well as solving any incidents of crime, vandalism and other misuse.

Locking systems are an integral part of the safety and monitoring of the safety of both properties and their tenants. Some TYS properties have an iLoq locking system, which allows for quick reactions without the need for changing or re-serialising the locks in situations where someone has lost their keys, for example.

The basis for collecting and processing personal data is implementing the legitimate interests of TYS, such as protecting possessions with a locking system and disclosing data to the police for the investigations of suspected crimes.

5. Register's data content and regular data sources

Data collected from the data subjects themselves in connection to key handover and access data collected from the door readers of properties.

Management of key loans:

- the property's address
- name and address of the keyholder and other potential contact information
- key pick up and return dates

Data saved by the iLoq system:

- access right data of keys
- key identification data
- door opening data (opening the lock was successful/unsuccessful)
- for locks with a clock circuit, date and time of when the door was opened (not used for apartment doors, only in certain common facilities).

6. Regular data disclosure

The data is usually not disclosed outside TYS.

In the case of suspected crimes, the data can be disclosed to an authority with the right to process such data, such as the police for investigating and solving crimes or accidents.

7. Transferring data outside the EU or the European Economic Area

Personal data is not transferred outside the member states of the European Union or outside the European Economic Area.

8. Register protection principles

Key loans are managed through an electronic system. Additionally, some TYS properties use the iLoq locking system that saves access data in an electronic system. The data contained in the electronic register for personal data have been protected with the appropriate technical and administrative measures.

Only those TYS staff representatives and partners that are entitled to processing data based on their work duties and who are under the obligation of secrecy have access to the data in the key register. Processing of personal data is limited, and the personal data collected is kept to a minimum. The data collected is needed in order for TYS to implement safe and functional key management. To protect personal data, we adhere to the relevant legislation and authority regulations as well as the information security policy and data protection guidelines of TYS.

9. Storage period of personal data

The entries regarding key handovers included in the rental agreement will be stored for three years after the end of the fiscal year during which the rental term has ended.

Regarding access entries, the iLoq system register holds the 500 latest door openings or access entries, after which the old log data is automatically overwritten by new data.

The storage periods of personal data are based on e.g. the Accounting Act and the guidelines related to state subsidised rental housing.

10. Rights of the data subject

The person has the right to receive confirmation on whether their personal data is being processed or not.

The data subject also has the right to inspect which of their data is maintained in the register and request the removal or rectification of saved data regarding them. The removal request can be implemented if it is possible with regards to the legislated storage periods and other obligations. The data subject must prove their identity to have their requests met.

The written request must be sent to the person managing the register matters (contact information given in section 11). The request can also be made in person by visiting the controller.

The data subject has

- the right to receive information about the processing of personal data.

The controller is obligated to provide the data subject with information about the processing of personal data. The data subject must be informed of, for example, the purposes for which their data is being used, where the data is disclosed and how long the data will be stored. This privacy policy acts as an informative document on the processing of personal data.

- the right of access to personal data

The data subject has the right to know whether their data has been saved in the register and inspect what data related to them have been saved in the register. The inspection request must be addressed to the person in charge of register matters (contact information available in section 11) either in writing or in person.

- the right to rectify data

The data subject has the right to request the rectification of inaccurate data or complementing incomplete data by contacting the controller. The data subject can also update and rectify some of their data via the Tenant Pages.

- the right to data removal

The data subject has the right to request the erasure of their personal data if it is no longer needed for the purposes for which it was collected or otherwise processed or if the data has been processed against the law. However, the controller can refuse to implement the erasure based on the legislated grounds or the obligations and rights of the controller. The written request must be sent to the person managing the register matters (contact information given in section 11).

- the right to restrict data processing

The data subject has the right to restrict the use of their data in certain situations. The data subject can contest the accuracy of their personal data, in which case the processing is restricted for a certain period so that the data controller can verify the accuracy.

- the right to oppose data processing

The data subject can oppose the processing in certain situations on grounds of their particular situation. These grounds must be specified in connection to the request.

- the right to data portability from one system to another

When applicable, the data subject has the right to have their own personal data to be transferred to another controller in a machine-readable format if this is technically possible and if the data remains secure.

- the right to prohibit direct marketing

A data subject has the right to prohibit the processing and disclosure of data related to them for the purposes of direct advertising, remote sales and other direct marketing and market and opinion polls by contacting the controller.

- the right to lodge a complaint with a supervisory authority

The data subject has the right to lodge a complaint with the competent supervisory authority, which is the Data Protection Ombudsman in Finland, if the data subject believes that their personal data has not been processed in accordance with the data protection legislation.

The website of the Data Protection Ombudsman is <https://tietosuoja.fi/en/home>.

We respond to any requests in accordance with the General Data Protection Regulation, at the latest within a month after receiving the request, unless the response to the data request takes longer due to a well-founded reason. In this case, the response time may be up to three months.

Exercising the rights listed above is primarily free of charge. If the requests are plainly unfounded, unreasonable or repeated in nature, we can charge a reasonable fee for implementing the request or refuse to implement the request.

11. Contact information of the controller and the data protection officer

To exercise the rights above, the data subject must present the request either in person or in writing to address:

Turku Student Village Foundation
Data protection officer
Inspection and refusal requests
Inspehtorinkatu 12A
20540 Turku, Finland

or by email: tietosuoja@tys.fi