

Customer register privacy statement

1. Registrar

Turku Student Village Foundation (hereinafter referred to as TYS)
business ID: 0142348-6
Inspehtorinkatu 12A
FI-20540 Turku
Tel. +358 2 2750 200

2. Person responsible for register-related issues

Tuula Kanervisto/data protection officer
Inspehtorinkatu 12A
FI-20540 Turku
Tel. +358 2 2750 200
tietosuoja@tys.fi

3. Register name

Customer register

4. Purpose of the processing of personal data

Personal data is processed for the management, analysis and development of the customer relationship and other relationship based on relevant context. Personal data is processed only to the extent necessary for the management of leasing activities and the maintenance of real estate.

The data is processed, for example, for the following purposes:

- tenant selection
- establishment and management of lease agreements
- management and development of customer relationship
- customer surveys (e.g. customer satisfaction surveys)
- tenant communications (e.g. sending newsletters, invitations to tenant events and bulletins)
- maintenance of lease account ledgers, invoicing and recovery of receivables
- property maintenance and fault reports
- housing counselling, housing democracy and housing activities
- planning, management and development of business operations and services
- taking care of the tenant's and lessor's rights and obligations

The basis for collecting and processing personal data is a contract relationship, legal requirements or the consent given by the data subject.

5. Register data content and regular data sources

The following personal data may be processed in the register and their change data concerning applicants, tenants and possible co-tenants:

Basic details, such as

- name
- date of birth
- personal ID
- contact details; address, telephone number and email address
- gender

Data related to customer relationship and other relevant context, such as

- customer number
- service language
- customer relationship start date
- forenames, surnames, personal IDs and/or dates of birth of persons living in the same household
- names and personal IDs and/or dates of birth of other persons living in the apartment, such as sub-letters and re-letters
- information and attachments to the housing application
- previous address and information on the previous address
- information on the need for housing
- indication of the authorisation given by the co-applicant to the data subject to provide the registrar with information concerning them
- information on employment and the duration and quality of the employment relationship
- income and assets data reported by the data subject
- advocacy information, including the district court's decision on guardianship and legal guardian's consent
- recovery data, credit data, debt adjustment data
- lease agreement information
- start and end date of the lease agreement
- invoicing and payment details, payer's name
- in case of a minor tenant, identity details of the guardian who signed the lease agreement
- fault reports
- complaints, feedback and other communication and actions related to the customer relationship and relevant context
- marketing measures targeting the data subject, their use and information provided in the context therewith
- bank account details provided by the data subject related to the termination of the lease agreement or refund
- direct marketing authorisations and prohibitions
- scoring of the housing application (scoring criteria can be found on the TYS website)

The data are collected from the data subjects themselves, for example, from the housing application form and from electronic services. The data is updated based on the events during the lease relationship. Permission to store data is requested on the housing application form.

Personal data can also be collected and updated from the registrar's other personal data registers, resigning customers, partners of the registrar and authorities and companies providing services related to personal data, such as the Digital and population data services agency and the credit register of Suomen Asiakastieto Oy.

6. Regular data disclosures

As a rule, data is not disclosed outside TYS. Data may be disclosed to, for example, the city of Turku, educational institutions, contractors executing debt collection on behalf of TYS, and authorities such as ARA and KELA, to the extent permitted and required by legislation in force at the time.

In addition, data may be disclosed to property management, maintenance, repair, security and lock agencies, as well as to electricity and information network suppliers for the delivery of services related to housing.

Personal data may be disclosed to the authorities who request it on the basis of legislation.

If the owner of the apartment changes to a third party, TYS may disclose to the new owner the information necessary for the management of the lease relationship.

7. Transfer of data outside the EU or the European Economic Area

As a general rule, data are not transferred outside the member states of the European Union or the European Economic Area.

TYS transfers personal data outside the EU/EEA area only to communicate with a tenant/applicant who lives or stays outside the EU/EEA. In this context, the data of the tenant/applicant may be transferred to the country where the tenant/applicant resides or stays. Where the EU Commission has adopted a decision on an adequate level of data protection with regard to the country of residence of the tenant/applicant, the transfer of data shall be based on such a commission decision. In the absence of such decision by the commission, the transfer of data outside the EU/EEA shall be based on the data subject's consent given when applying for housing.

8. Principles of register protection

Personal data is processed in all situations with respect for privacy. In the protection of personal data, we comply with legislation and the regulations of the authorities, as well as the TYS's data security policy and data protection guidelines. Personal data may only be processed by persons authorised to do so on behalf of their duties.

Data contained in the electronic personal data register is adequately protected by technical and administrative measures. The data can only be accessed by TYS personnel

representatives and partners who have been granted individual access to the system on the basis of their duties and who are bound by a confidentiality agreement.

Manually maintained materials are located in locked rooms, which are accessible only to designated persons.

We require our partners to whom the data is transferred or disclosed to process personal data in accordance with data protection requirements as well.

9. Retention period of personal data

Personal data shall be retained for as long as necessary for the purposes for which they were collected and processed, or for the performance of the agreement for as long as required by the legislation or regulations. After this the personal data will be appropriately deleted.

Lease agreement details are stored for ten years after the lease agreement has ended and the lease relationship obligations have been fulfilled.

Applications for housing that have not led to an offer or an agreement shall be retained for three years from the date of initiation.

The length of the retention periods of personal data is influenced, for example, by the guidelines concerning public housing and interest-rate subsidies and the regulations of the Accounting Act.

10. Data subject rights

A person has the right to obtain confirmation from the registrar that personal data concerning them are being processed or not being processed.

A person also has the right to check which personal data concerning them are stored in registers and to request the deletion or correction of personal data stored about them. The deletion request will be executed if possible within the legal retention periods and other obligations. In order to execute requests, the data subject must prove their identity.

A written request must be sent to the person in charge of register matters (contact details in section 11). The request may also be made in person with the registrar.

The data subject has

- Right to information on the processing of personal data

The registrar is obliged to provide the data subject with information on the processing of personal data. The data subject must be informed of, for example, for what purpose the data is used, where the data are disclosed and the period for which the data are stored.

This privacy statement serves as an information document on the processing of personal data.

- Right of access

The data subject has the right to know whether their data has been stored in the register and to check what data concerning them is stored in the register. The inspection request must be submitted to the person in charge of register matters (contact details in section 11) in writing or in person.

- Right to rectify data

The data subject has the right to request the rectification of inaccurate data or the correction of incomplete data by contacting the registrar.

- Right to the deletion of data

The data subject has the right to request the deletion of data if the processing of the data is not necessary for the purposes for which they were collected or otherwise processed, or where personal data have been unlawfully processed. However, the registrar may refuse to carry out the deletion on the grounds provided for by law or on the basis of the obligations and rights of the registrar. A written request must be sent to the person in charge of register matters (contact details in section 11).

- Right to restrict the processing of data

The data subject has the right to restrict the use of their data in certain situations. The data subject may dispute the accuracy of the personal data, in which case the processing shall be limited to the period during which the registrar is able to verify their correctness.

- Right to object the processing of data

The data subject may object to the processing in certain situations on grounds relating to their personal, particular situation.

- Right to transfer data from one system to another

The data subject has the right to have their personal data transferred to another registrar in a machine-readable form, if technically possible and secure.

- Right to prohibit direct marketing

The data subject has the right to prohibit the processing and disclosure of data concerning them for the purposes of direct advertising, remote selling and other direct marketing, as well as market research and opinion polling, by contacting the registrar.

- Right to lodge a complaint with a supervisory authority

The data subject has the right to lodge a complaint with the competent supervisory authority, the data protection ombudsman in Finland, if the data subject considers that their personal data has not been processed in accordance with the data protection legislation.

The website of the data protection ombudsman can be found at <http://www.tietosuoja.fi>.

TYS will respond to requests in accordance with the data protection regulation no later than within one month of the receipt of the request, unless there are reasonable



grounds for responding to the request, when the response time may be a maximum of three months.

Exercise of the rights listed above is, in principle, free of charge. If the requests are manifestly unreasonable or disproportionate, or if they are repeatedly presented, we

may charge a reasonable fee for the execution of the request or refuse to execute the request.

11. Contact details of the registrar and the data protection officer

In order to exercise the above rights, the data subject must lodge a request either in person or in writing to:

Turku Student Village Foundation
Data protection officer
Inspection and prohibition requests
Inspehtorinkatu 12A
FI-20540 Turku

or by email: tietosuoja@tys.fi

This Privacy statement has been updated on 18.10.2023