

OY HELSINGIN ASUNTOHANKINTA AB'S DATA PROTECTION STATEMENT – CLIENTS

Last updated 22 May 2018

The purpose of this data protection statement ('**Data Protection Statement**') is to state how and why does Oy Helsingin Asuntokantanta Ab collect, use and disclose personal data. This Data Protection Statement applies to the residents of Oy Helsingin Asuntokantanta Ab apartments, other clients and the family members or trustees of the residents that have the right to represent the resident or client in processing the matter ('**Clients**').

1. CONTROLLER

The controller, in accordance with the data protection legislation, is Oy Helsingin Asuntokantanta Ab ('**Controller**'). The Controller is responsible for ensuring that the personal data is processed in accordance with this Data Protection Statement and the valid data protection laws.

The Data Protection Officer and primary contact person is:

Pekka Paukkonen
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tel. +358 (0)20 7199 670

2. LEGAL GROUNDS AND THE PURPOSE OF PROCESSING PERSONAL DATA

The Controller will process the personal data of its clients for several different purposes, which have been described below.

2.1 Tenancy

The residents' personal data will be processed for the purposes of maintaining their tenancy and managing the requisite obligations, including such matters as collecting rental debts and other costs related to the apartment, such as a parking space or sauna fees, as well as tenant communications concerning such matters as maintenance measures, rental increases and building committee meetings. With regard to these measures, the processing of personal data is based on the tenancy agreement between the contract parties.

2.2 Communication

The Controller can communicate about changes and renewals regarding the apartments by post or email. The processing of personal data regarding this is based on the Controller's legitimate interest to provide the Clients with information about matters such as maintenance measures as well as other changes concerning the properties and apartments.

2.3 Camera surveillance of properties

The properties may utilise camera surveillance to ensure the safety of the residents, other visitors and the Controller's personnel. The camera surveillance will not be targeted at individual persons or apartments, but instead around the general property. Processing personal data in regards to this measure is based on the Controller's legitimate interest to secure its properties and the safety of people visiting it.

3. PERSONAL DATA COLLECTED

3.1 Necessary data for a tenancy

During the tenancy, the following information is collected about the main tenant:

- Basic information, such as the tenant's name and personal identity code

- Contact information, including telephone number, email address, address
- Information regarding trustees, if applicable
- Information about the rental agreement; the contract's starting and end dates, type of rental agreement and amount of rent
- Any changes to the housing situation, such as other people living in the apartment
- Key transfer, parking space, sauna and laundry room shifts
- Defect notifications and maintenance visits
- Complaints and any warnings issued
- Credit history entries, debt collection processes and evictions
- Contacts and other communication by the residents

The following information will be collected concerning other people coming to live in the apartment:

- Basic information, such as names and personal identity codes
- Information about moving in, if different than the main tenant's
- A power of attorney or a trustee decision, if necessary

The Controller does not primarily process Client information related to special groups of people, but in special cases this kind of data can be included or derived from other data, such as

- information related to health state
- information about the need for social welfare or child care and its arrangements

Data concerning special groups can be processed about Clients that live in the Controller's apartments for the disabled or in apartments rented to social welfare services, for example.

3.2 Necessary data to ensure safety

- Camera recordings of properties
- Information about residents managing the keys of their apartment

4. DATA DISCLOSURE

The Controller may disclose the Clients' personal data to third parties in the following situations:

- to the authorities, such as Kela, social services, child welfare and the City of Helsinki, based on or within the restraints of the law;
- if so dictated by law, such as when responding to a summons or legal claim or with regards to legal proceedings;
- if the Controller is involved in a business merger or acquisition;
- when we sincerely believe that disclosing the data is necessary for securing our rights, protecting you and others, investigating crime or responding to the authority requests.

Additionally, trusted service providers may have access to a Client's personal data, such as maintenance companies in order to provide property maintenance services, security service providers in order to arrange camera surveillance and locking services, and IT service providers in order to provide software maintenance services and support services, as well as for processing defect notifications electronically. The service providers act on behalf and in the name of the Controller and have no independent right to utilise the personal data.

5. INTERNATIONAL DATA DISCLOSURES

The Controller will not process the Clients' personal data outside the European Economic Area.

6. STORING DATA

The Controller will only store the Clients' personal data for as long as necessary in order to implement the purposes defined in this Data Protection Statement. The storage period is affected by such factors as the personal data's purpose of use and legal regulations, based on which the Controller has the obligation to store the personal data for a certain period of time. Below, we have determined the most usual storage times for personal data.

In most cases, the tenants' personal data will be stored for five (5) years after the rental term has ended and, in accordance with the Accounting Act, data related to rental payments will usually be stored for six (6) years, unless the Controller has the right or the duty to store the personal data longer due to applicable laws or the contract relationship, for example for the purposes of collecting rental debts or responding to a legal claim.

The camera surveillance recordings will primarily be stored a maximum of one (1) year of their recording date.

7. RIGHTS

The Client has the right to gain access to the personal data pertaining to them, to rectify and update the data and to request the restriction of processing their personal data, as decreed in the applicable data protection legislation. The Clients can also request the erasure of their personal data. The erasure of personal data during the tenancy is limited by the fact that some personal data is necessary in order to ensure the execution of rights and obligations pertaining to the rental relationship, for example in matters such as communication, invoicing and the Controller's legislated duties, and such data cannot be erased during the tenancy term.

The Clients have the right to oppose to a processing that is based on legitimate interest and the right to request limiting the processing of data within the restraints of the applicable legislation.

The Clients have the right to receive the personal data pertaining to them in an organised, publicly utilised and machine-readable format and the right to transfer the data to another controller in accordance with and within the limits of the applicable data protection legislation. This right pertains to personal data disclosed by the person themselves, which have been collected based on the Client's consent or their tenancy agreement. This right to transfer data does not apply to personal data which is processed based on a legal obligation.

The requests mentioned above can be sent by email to [toimisto@helah.fi].

The Client has the right to submit a complaint to a national data protection authority if they feel that the regulations of data protection legislation have been violated when processing their personal data. In Finland, they can address the complaint to the Office of the Data Protection Ombudsman: <https://tietosuoja.fi/en/home>

8. DATA PROTECTION

The Controller applies the appropriate technical and organisational data protection measures to protect the data against disposal, corruption, misuse and unauthorised access. The Controller will limit the access to the personal data only to those employees and contractors that need access to this information for the purposes of their work and to service providers who are allowed to process the data only in accordance with the Controller's instructions. All people with access to the personal data are bound by confidentiality.

9. CONTACT INFORMATION

If you have questions related to this Data Protection Statement or the Clients' personal data stored by the Controller, you can contact the Controller's Data Protection Officer by email.