

# Privacy policy of Colliers Finland Group's rental apartment applicant data file

## 1 Controller

Colliers Finland Group Oy  
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## 2 Contact details for data file issues

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## 3 Name of data file

Colliers Finland Group's rental apartment applicant data file

## 4 Basis for processing of personal data

The processing of personal data by Colliers Finland Group Oy and companies belonging to the same group (hereinafter Colliers) is based on the legitimate interest of Colliers or the data subject, an agreement between Colliers and the data subject, the consent given by the data subject or compliance with a legal obligation.

Colliers' legitimate interest includes the customer relationship between Colliers and the data subject or Colliers' business interests, such as customer satisfaction, service quality control and service development. Colliers' legitimate interest may also be related to risk mapping and management and the protection of rights and property. The processing of data is based on Colliers' legitimate interest to be able to provide residential leasing services to its clients and rental apartment applicants. When the processing of personal data is based on legitimate interest, the benefits and possible disadvantages of the processing for the data subject are assessed. Colliers has assessed that the rights and interests of data subjects do not override legitimate interest. Upon request, Colliers will provide additional information on the processing of personal data based on legitimate interest.

The processing of personal data is based on the fact that the data subject has applied for a rental apartment from Colliers, lives in an apartment rented from Colliers or has once lived in an apartment rented from Colliers, or has requested information about vacant apartments or has signed up for the newsletter.

Colliers processes personal data for digital direct marketing based on the legitimate interest of Colliers and on section 200, subsection 3 of the Electronic Communication Services Act. When the processing of personal data is not based on the legitimate interest of Colliers, data is processed only if the data subject has given his or her consent for digital direct marketing. Data subject can, for example, subscribe our

newsletter. Data subject has always the right to withdraw his or her consent. Additionally, data subject has a right to prohibit direct marketing.

## 5 Purpose for processing of personal data

Colliers processes the personal data of the data subjects to the extent that it is necessary for the rental and brokerage of apartments. Providing personal information on the rental application form is a prerequisite for the creation of a contractual relationship and/or customer relationship. Without the necessary personal data, Colliers cannot provide rental service.

Colliers processes data subjects' personal data for the following purposes inter alia:

- selection of residents
- conclusion of a rental agreement
- management and development of the customer relationship
- ensuring of the lessor's rights and obligations
- rental account ledger and other payment transactions
- marketing and communication
- customer service and communication, e.g. messages sent via chat service on the Colliers Asunnot website are stored by Colliers in order to respond to inquiries and requests regarding the rental apartment applicant's application
- management, production and development of the business operations and services
- ensuring of the safety and legal protection

## 6 Data content of data file

The data file may contain data about rental apartment applicants and tenants, their spouses, co-payers or any other persons who will reside with the applicant, and subtenants. The data file contains the following personal data:

### Basic data

- first and last name
- personal identity code, or if the person does not have a personal identity code, identification data from travel document (e.g. number or passport)
- telephone number
- email address
- postal address
- communication language.

### Data related to rental apartment applicant and selection of tenants

- type of application (new application/change of apartment)
- type of apartment applied for and other information (e.g. city/municipality, type of building, grounds for the need for an apartment)
- previous postal address and information on current apartment
- employment, occupation, duration of employment and information on income and wealth
- information on taxes, debt and adjustment of debts
- information on residence permit
- credit information and information of payment behaviour

- other information provided by the applicant, e.g. state of health, marital status and gender
- If the rental apartment applicant is under 18 years old, the data file also contains the following information about his or her guardian: first and last name, personal identity code or date of birth, contact information and mention of credit information.

### **Data related to applications for state subsidized rental apartments ("ARA")**

The processing of personal data is based mainly on the regulation regarding the selection of residents of state-subsidized rental apartments and the official instructions that specify it. If the applied / rented apartment is ARA-apartment, Colliers will, inter alia, ask for the following information:

- ARA-apartment applicant's basic data, e.g. name, contact information, citizenship and personal identity code
- information related to ARA-application, e.g. apartments applied for, history of applications, employment, credit information, need for an apartment and information on current apartment
- ARA-attachments of application, e.g. certificate of income / payslip, some other certificate of livelihood or pre-completed tax return
- information on tenancy and information on persons who will reside with the applicant
- with consent of data subject, pregnancy certificate and estimated date of birth.

## **7 Data sources**

Colliers receives the data file's information from the data subject's rental apartment application form and its attachments. In addition, data is collected when concluding a lease agreement and when data subject contacts Colliers by phone, email, or via chat service on the Colliers Asunnot website. The personal data of the guardians of under 18 years old rental apartment applicants is collected from the applicant or guardian himself/herself. Colliers may also collect and update personal data from Suomen Asiakastieto Oy's credit information register and from different authorities, e.g. Digital and Population Data Services Agency, National Enforcement Authority of Finland and KELA.

## **8 Disclosures and transfers of data and data transfer outside the EU or the EEA**

As a rule, Colliers does not disclose the personal data it collects and complies with confidentiality obligations regarding personal data, unless otherwise required by law or for the establishment, exercise, or defence of legal claims.

As a rule, personal data is not transferred outside the EU or EEA, with the exception of the United Kingdom to a small extent on the basis of the European Commission's adequacy decision, Article 45 of the General Data Protection Regulation.

The residential leasing services agreement requires that Colliers can disclose personal data to the lessor. The personal data of a rental apartment applicant and a potential co-applicant must be disclosed to the lessor, for example, in order to make a rental decision or in connection with the conclusion of a lease agreement.

Colliers uses an external service provider, Visma Tampuuri Oy, for the collection and management of personal data. The service provider processes the personal data only to the extent necessary for the maintenance of the system and for the rectification of errors.

## **9 Principles of protection and storage periods of data file**

The protection of the data file and the supervision of the use of the data file comply with the provisions of EU and national data protection legislation. The data is stored in Colliers' information systems, which use both technical and programmatic means to ensure information security and monitor the use of data. Access to the data in the data file is restricted to specifically designated persons to the extent required by their duties. All persons using the data in the data file are bound by professional secrecy. Colliers ensures data protection through data processing agreements with its subcontractors that process personal data.

Colliers retains personal data only for as long as necessary for the purposes defined above, possible legal proceedings and legal requirements.

Colliers complies with the rules and guidelines for retention periods relating to ARA-apartments. In accordance with the instructions of the Housing Finance and Development Centre of Finland, ARA-apartment applications that have not led to an offer or agreement, are retained for three (3) years from the date of initiation. ARA-apartment applications that have led to an agreement, are retained for three (3) years from the moment of acceptance.

Otherwise, rental apartment applications that have not led to an offer of agreement, are retained for three (3) months. In accordance with the Brokerage Act, the information and documents relating to the brokerage assignment are retained for five (5) years from the end of the assignment. After the retention periods provided by applicable laws or other instructions, Colliers retains personal data as long as necessary for invoicing, debt collection or possible legal procedures.

Customer feedback and complaints are retained as long as necessary for the processing of the feedback or complaint, or for possible legal procedures.

## **10 Automated decision-making and profiling**

Colliers uses automated decision-making and profiling as part of the user-initiated rental of apartments through Colliers Asunnot online service (rent now -service). To rent an apartment through rent now -service, the rental apartment applicant needs to identify himself/herself with personal internet banking codes or a mobile certificate. Through strong identification Colliers gets your name, social security number and citizenship. The rental decision will be made based on your identification information, credit information and age. Rental apartment applicant must be registered in the Finnish Population Information system.

When a rental apartment applicant uses rent now -service, Colliers checks, as part of the automated decision-making, the applicants credit information from Suomen Asiakastieto Oy's credit information register and from Digital and Population Data Services Agency. Colliers checks also the rental apartment applicant's possible residential history if you have previously rented an apartment from Colliers. Through credit decision service Colliers gets an automated rental decision recommendation

which helps it to manage risks related to the rental activities. Possible problems in credit history or history as a resident might prevent an applicant from being able to rent an apartment through the rent now -service.

It is not possible to rent an apartment through rent now -service if the rental apartment applicant has moved to Finland less than three (3) months ago, or if the applicant is under 18 years old.

If the apartment is rented together with another person, Colliers checks the information for both of the rental apartment applicants. It is not possible to conclude a joint rental agreement for more than two persons through rent now -service. The lease agreement can be concluded in rent now -service only if neither of the rental apartment applicants has above-mentioned obstacle for renting of the apartment.

The data subject has a right to dispute a decision that is based only on automated processing and a right to submit additional information. The data subject has also a right to request a manual decision-making procedure instead of the automated procedure. The inquiries and requests regarding the automated decision-making data subject can submit to the following email address: [asiakaspalvelu@colliers.com](mailto:asiakaspalvelu@colliers.com).

## **11 Rights of the data subject**

### **Right of access to personal data**

The data subject has the right to obtain confirmation as to whether Colliers processes personal data concerning him/her. If personal data is processed, the data subject has the right to inspect the data concerning him or her stored in the personal data file and to receive a copy of the personal data being processed. However, the data subject's right to receive personal data may be restricted or refused under the EU General Data Protection Regulation if the provision of personal data adversely affects the rights or freedoms of other persons. Such protected rights include, for example, Colliers' trade secrets and another person's personal data. This right may also be restricted on grounds laid down by national law.

When requesting data, Colliers has the right to request the data subject to specify in an adequate manner which personal data or processing activities the request concerns.

### **Right to rectification, restriction, erasure and portability of personal data**

The data subject has the right to request rectification of their data if the personal data is inaccurate, incorrect, incomplete or outdated.

In certain situations, the data subject has the right to restrict the processing of his or her personal data. Such a right exists, for example, in a situation where the data subject contests the accuracy of the personal data or the lawfulness of the processing. In this case, the processing of the data will be restricted until Colliers has verified the accuracy of the data or the lawfulness of the processing.

The data subject has the right to request the erasure of personal data if there is no longer a justified reason for processing the data. However, despite such a request, Colliers is obliged to retain personal data for as long as the processing is necessary for compliance with legislation or for possible legal proceedings.

If the data subject's personal data are processed on the basis of consent or a contractual relationship, the data subject has the right to receive such personal data

concerning him or her provided to Colliers in a structured, commonly used and machine-readable format and the right to transmit this data to another data controller.

#### **Right to withdraw consent given**

If the processing of personal data is based only on the data subject's consent, the data subject has the right to withdraw his or her consent at any time.

#### **Right to prohibit direct marketing**

The data subject has the right to prohibit the use of personal data concerning him or her in direct marketing at any time. If the data subject prohibits the use of personal data in direct marketing, the data may no longer be processed for that purpose.

#### **Right to object to the processing of personal data in certain cases**

The data subject has the right to object to the processing of their data when personal data is processed on the basis of legitimate interest. The data subject does not have the right to object to the processing of their personal data when the processing is based on an agreement between Colliers and the data subject.

#### **Right to lodge a complaint with a supervisory authority**

The data subject has the right to lodge a complaint with the competent supervisory authority if the data subject considers that his or her personal data has not been processed in accordance with applicable data protection legislation. The website of the Finnish Data Protection Ombudsman can be found at: <https://tietosuoja.fi>

### **12 Requests related to the rights of the data subject**

In questions related to the processing of personal data and the exercise of their rights, the data subject may contact Colliers' contact person mentioned in section two (2).

If the data subject requests more than one copy, the data controller may charge a reasonable fee based on administrative costs. The data controller may also charge a reasonable fee for fulfilling the request if the data subject's request is manifestly unfounded or excessive. Alternatively, the controller may refuse the request.

### **13 Changes to this Privacy Policy**

This privacy policy may be updated as our business develops or legislation changes. This privacy policy has been updated 25 January 2024.