

Privacy policy of Colliers Finland Group's Tenant Portal

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 Tenant Portal 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 lives in an apartment owned by a Colliers' customer for whom Colliers provides residential leasing and property management services.

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 of apartments and property maintenance.

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

- using, maintaining and developing Colliers' digital Tenant Portal service
- managing the lease agreement
- customer relationship management and development
- taking care of the lessor's rights and obligations
- property maintenance and fault reports
- rent ledger and other payment transactions
- marketing and communications
- customer service and communication
- managing, producing and developing business and services
- ensuring security and legal protection

6 Data content of data file

When the data subject uses the Colliers' digital Tenant Portal service, his/her personal data may be needed in the following matters related to the tenancy and property maintenance:

- lease agreement information, invoicing, payment and collection transaction information
- Fault reports and how to handle them
- Monitoring apartment-specific consumption and energy data
- Measures related to the maintenance and repair of the dwelling
- Key management and electronic locking system
- Resident information on the housing company's digital staircase displays, if the site has a digital staircase display
- parking space, sauna and laundry shifts
- Door opening services
- communication about repairs to an apartment or property
- communication related to the tenancy
- Submission of proof of rent payment
- Measures related to the collection of possible rent receivables and customer invoicing
- Treatment of possible housing disorders
- Feedback and customer satisfaction surveys
- Rent payment information
- Bank account information for refunds or reimbursements

7 Data sources

Colliers obtains the data in the register from the data subject himself/herself during the tenancy when the data subject logs in to Colliers' Tenant Portal service or uses the site.

Personal data may also be collected and updated from residential partners, maintenance companies, Suomen Asiakastieto Oy's credit register and authorities such as the Population Register Centre, the Enforcement Authority and Kela.

8 Disclosures and transfers of data and transfer of data outside the EU or 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.

Colliers uses an external service provider, Visma Tampuuri Oy, to collect and manage personal data. The Service Provider processes personal data only to the extent necessary for the purposes in question, for system maintenance and troubleshooting of the service.

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 register is restricted to specifically designated persons to the extent required by their duties. All persons using the data in the register 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.

The personal data of the data subject is stored as long as the data subject lives in a rental apartment owned by a Colliers' customer. After the retention periods specified in the law and other guidelines or after the resident has moved out, Colliers retains personal data for as long as is necessary for billing, debt collection and possible legal measures, but no longer than 10 years.

Customer feedback and complaints are stored for as long as is necessary to process the feedback or complaint or due to possible legal proceedings.

If the service agreement between Colliers and the apartment owner ends, all personal data about the data subject will be deleted.

10 Automated decision-making and profiling

Colliers does not carry out automated decision-making or profiling based on personal data.

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 others. 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.