



Privacy Notice of personal data collected by the websites of TVT Asunnot Oy and other controllers acting as its joint controllers.

1. Joint controllers

TVT Asunnot Oy
(Business ID: FI08721099)
Käsityöläiskatu 3, 20100 Turku, Finland
Tel. +358 (0)2 262 4111

and the following companies

TVT Kodit Oy
(Business ID: FI31382419)
Käsityöläiskatu 3, 20100 Turku, Finland

Turun Osakehuoneistot Oy
(Business ID: FI23446101)
Käsityöläiskatu 3, 20100 Turku, Finland

Turun Palvelutilat Oy
(Business ID: FI25541567)
Käsityöläiskatu 3, 20100 Turku, Finland

Hereinafter TVT Asunnot Oy, TVT Kodit Oy, Turun Osakehuoneistot Oy and Turun Palvelutilat Oy (separately “Joint Controller” and together “Joint Controllers”).

More information about Joint Controller operations is available on TVT Asunnot Oy’s website, under section statement of Joint Controller operations.

Together, the Joint Controllers will act as the joint controllers of a database consisting of the personal data defined in this privacy notice collected via the registered websites.

The Joint Controllers will together make decisions on the personal data collected about clients and its purpose of use. The Joint Controllers will also decide together on the matters described in this Privacy Notice. If you have any inquiries or requests related to personal data collected about clients, we



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recommend you to primarily contact the person in charge of register matters at TVT Asunnot Oy. If you wish, you can also contact the other joint controllers.

2. Person in charge of register matters

TVT Asunnot Oy
Housing Service Manager
Käsityöläiskatu 3, 20100 Turku, Finland
Tel. +358 (0)2 262 4111
tvtasunnot@tv.t.fi

3. Contact information of the data protection officer

Data protection officer
Käsityöläiskatu 3, 20100 Turku
Tel. +358 (0)2 262 6026
tietosuojavastaava@tv.t.fi

4. Register name

Register for the Joint Controllers' websites

5. Purpose of use and the grounds for processing of personal data

A data subject refers to each visitor on Joint Controllers' websites. Personal data will be processed for the purposes of

- developing and maintaining the Joint Controllers' websites and tenant pages,
- processing the contacts through the website's contact request channel,
- customer guidance and advice (e.g. through the chat service),
- improving the user experience,
- planning and development of the Joint Controllers' business operations, and



- processing and responding to the accessibility feedback received in accordance with the Act on the Provision of Digital Services (“Accessibility act”, 306/2019)

Website refers to the www.tvt.fi website (“Website”).

We process the personal data of data subjects with the data subject’s explicit consent, in order to implement the agreement between the data subjects and the Joint Controllers or based on legislated grounds.

6. Register’s data content

The following personal data of the data subjects and their changes can be processed in the register:

- IP address
- the technical data sent by the data subject’s browser to the controller’s server and the cookies sent to the data subject’s browser and the related data
- other personal data delivered by the data subject to the Controller via the Website’s contact channel

The apartment applications delivered through the Website and the separate services on the Website, such as the tenant pages, are part of the customer register maintained by the Joint Controllers, governed by its own privacy statement. (Privacy Notice of personal data collected about the customers of TVT Asunnot Oy and other controllers acting as its joint controllers).

More information about the cookies collected by websites at any time and their purposes if use can be found in the cookie tools of websites and the cookie information. A Joint Controller has the right to change the cookies used on the website by notifying the data subject of this in the cookie tools and information.

A data subject can, at any time, change their consent related to cookies via the website’s cookie settings. The data subject can



also choose to remove cookies from use from the settings of their web browser.

Information related to special personal data groups may include sensitive data of the data subject, such as information related to their health state, doctor's certificates, need for social or child welfare and their arrangements or religion or beliefs.

We do not purposefully process data subject's special personal data in the personal register formed based on the Website.

However, we may receive personal data containing these special personal data groups from the data subject, if the data subject discloses them to us unprompted when using the Website.

We process personal data containing these special personal data groups with highlighted confidentiality.

7. Regular data sources

Personal data is collected from the data subjects when they use the Joint Controllers' websites and when they disclose personal data to the Joint Controllers during their website visit.

8. Storage period of personal data

The personal data collected by the website will be stored as long as the data subject's consent remains valid and as defined in the cookie description.

If the data subject has requested the removal of their data due to withdrawing their consent, we will remove the personal data without undue delay unless we have other grounds for processing the data subject's personal data on the basis of this data protection regulations.

9. Data disclosure and transfer

The companies acting as Joint Controllers will process personal data by themselves. Personal data are not regularly disclosed to any parties external to the Joint Controllers.



However, personal data can be disclosed and transferred to service providers used by the Joint Controllers at the time in accordance with the limitations allowed and mandated by data protection regulations valid at the time. In such cases, the personal data processing agreement between the Joint Controllers and the processor of personal data will be followed.

Personal data can be disclosed and processed between the Joint Controllers.

Personal data can be disclosed and transferred in accordance with the limitations allowed and mandated by data protection regulations valid at the time based on a processing agreement between us and the processor of personal data.

In such cases, the personal data can be disclosed and transferred to the contractual partners of TVT Asunnot for the purposes of maintaining and developing the website, for example.

Personal data can also be disclosed or transferred to third parties in connection to potential corporate restructuring, for example to potential buyers and/or their advisors, or otherwise based on legislation.

Personal data is not regularly transferred or disclosed outside the member states of the European Union or outside the European Economic Area. If the personal data of the data subjects are processed outside EU/EEA, we will ensure that an adequate data protection level will be secured for the data subjects' personal data prior to the processing taking place in third party countries.

The adequate level of the data protection of a data subject's personal data will be ensured by applying the protective measures required by the EU's and national data protection legislation (such as the model clauses by European Commission). We also follow the other obligations of data protection regulations if the personal data is processed outside the EU or EEA.

10. Register protection



Electronically processed personal data contained in the register has been protected with firewalls, passwords and, if necessary, with other technical measures generally approved in the field of information security.

Manually maintained materials are kept in facilities access to which is prohibited to unauthorised persons.

Only certain identified employees of the Joint Controller(s) and companies commissioned by and working on behalf of the Joint Controller(s), who have signed a confidentiality agreement, have access to the data in the register with an individual licence granted by the Joint Controller(s).

11. Rights of the data subject

Right of access to personal data

A data subject has the right to inspect what data regarding them has been saved in the register or confirm that no personal data about them has been saved in the register.

The inspection request must be sent to the person managing the register matter as a written and signed document. The inspection request can also be made in person by visiting the controller.

The Joint Controller(s) can or may charge a reasonable fee for performing the inspection request or refuse to perform the inspection request, if the data subject's requests are obviously unfounded or unreasonable, for example when the requests are repeated or if the data subject's requests are for several copies of documents containing their personal data.

Right to rectification of data

The data subject has the right to request the rectification of inaccurate data by contacting the controller.

Right to erasure of data



The data subject has the right to request the erasure of their personal data from the register, unless there is a legal ground for their processing.

Right to restriction of processing

A data subject may request the restriction of processing their data based on the grounds defined by the law.

Right to data portability from one system to another

To the extent that the data subject has disclosed the Joint Controller data which is processed based on their consent, the data subject holds the right to receive such information usually in a machine readable format and the right to transfer this data to another controller.

Right to withdraw consent

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

However, any processing done for the data subject's personal data prior to the withdrawal of consent does not become groundless even if the consent is withdrawn.

Right to lodging a complaint with a supervisory authority

The data subject has the right to lodge a complaint with the competent supervisory authority, if they believe that the Joint Controller has not or Joint Controllers have not adhered to the data protection regulations applied to the operations. The national supervisory authority is the Office of the Data Protection Ombudsman <https://www.tietosuoja.fi>

Right to object to processing



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 to the extent their personal data is used or collected for this purpose.

12. Cookies

Cookies are small text files that our website save on data subject's computer, mobile device or other terminal device when they are using the website.

We use cookies to, for example, offer online services to a data subject, to customise their service experience and to develop and monitor our services.

A data subject has the right to choose to which other cookies than those necessary they will give their consent. Necessary cookies can be set regardless of the data subject's consent.

A data subject can also change the settings of their browser and erase the settings installed on the browser after visiting the website.

13. Third-party content

Our services may have links to websites and content owned by third parties. When the data subject moves to such sites or services, they must read and approve their possible privacy statements. These websites or services are not under the control of the Joint Controllers and they are not responsible for their content or privacy statements.

14. Other

We do not perform automated decision-making or profiling. We request data subjects to contact us via email at tietosuojavastaava@tvt.fi. in case they want any additional



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information about the data protection policies or if they wish to exercise their rights as a data subject.

We may update this privacy notice by sharing a notification of this on our website or by other electronic means.

This privacy notice was last updated on 7 March 2023.