



Privacy Notice of personal data collected about the customers of TVT Asunnot Oy and other controllers acting as its joint controllers, 17 August 2023

1. Joint Controllers

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

and the following companies

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

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

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

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

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

The Joint Controllers will together make decisions on the personal data collected about customers 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 customers, we recommend you to primarily contact the person in charge of register matters or the data protection officer 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
Tel. +358 2 262 4111
tvtasunnot@tvt.fi

3. Contact information of the data protection officer

Data protection officer
Käsityöläiskatu 3,
20100 Turku
Tel. +358 2 262 6026
tietosuojavastaava@tvt.fi

4. Register name

A register based on a customer relationship with the joint controllers and other appropriate contexts

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

Personal data is used to establish, manage and maintain the data subject's customer relationship, such as:

- processing housing applications
- establishing a lease relationship
- maintaining customer data and customer relationships
- maintaining the rent ledger
- customer surveys, such as customer satisfaction surveys
- maintenance of apartments and sharing the relevant information as regards to this with the maintenance companies with a contractual relationship with the Controller
- collection of rental debts and other potential lease receivables
- terminating rental agreements
- customer communications by the Joint Controllers (such as a client newsletter)
- producing and maintaining tenant pages

In addition, the Joint Controllers process personal data on the basis of the following legitimate interests:

- protecting the legality of the Joint Controllers' own operations

- preventing potential abuse of rental apartments
- verifying the actual tenants living in a rental apartment and restricting prohibited subletting of apartments
- informing the authorities and other relevant parties of any violations

A data subject refers to a current, former or potential customer of ours, for example.

We process the personal data of the data subjects based on the following processing grounds as determined in data protection regulations:

- an explicit consent given by the data subject
- for implementing an agreement in which the data subject is one of the contract parties
- to follow the legislated obligations set for the Joint Controllers (such as assessing the tenant selection criteria in accordance with the Act on the Use, Assignment and Redemption of State-Subsidized (ARAVA) Rental Dwellings and Buildings)
- a duty related to public interest or public authority and
- the legitimate interest of the Joint Controllers.

Summary of processing grounds as regards to each processing action

Processing action of personal data	Grounds for processing personal data
processing housing applications	implementing agreements, following the legislated obligations set for the Joint Controllers, a duty related to public interest or public authority, consent
concluding rental agreements	implementing agreements, legislated obligation, a duty related to public interest or public authority
maintaining customer data and customer relationships	implementing agreements
maintaining the rent ledger	implementing agreements
tenant surveys	consent

maintenance and repairs of apartments	implementing agreements, following the legislated obligations set for the Joint Controllers
collection of rental debts and other receivables	implementing agreements, legislated obligation
terminating rental agreements	implementing agreements
tenant communications by the Joint Controllers	implementing agreements, consent
producing and maintaining tenant pages	implementing agreements, consent
protecting the legality of the Joint Controllers' own operations	legitimate interests
preventing potential abuse of rental apartments	legitimate interests
verifying the actual tenants living in a rental apartment and restricting prohibited subletting of apartments	legitimate interests
informing the authorities and other relevant parties of any violations	legitimate interests

The Joint Controllers have drafted a balance test on the realisation of legitimate interests in accordance with the data protection legislation.

6. Data content of the register

The following personal data of the data subjects and their changes can be processed in the register related to apartment applicants, recommended customers, tenants and potential co-tenants:

Basic information, such as

- name
- personal identity code

- contact information (postal addresses, telephone numbers, email addresses)
- sex

Data related to housing applications and to maintaining customer data and customer relationships, such as

- customer number
- starting date of the customer relationship
- number of people living in the same household
- first and last names and the personal identity code of common law or married spouses living in the same household
- first and last names and the personal identity codes of all persons living in the same household
- first and last names and the personal identity codes of persons living in the same household with the data subject's consent
- information about the co-applicant's permission to the data subject to deliver data related to the co-applicant to the controller
- information about potential trustee
- information about employment and the duration and type of the employment contract
- information related to income and wealth
- credit information
- debt adjustment information
- debt collection information
- information about an apartment preceding current client relationship
- information related to the need for an apartment
- information related to the rental relationship, i.e. rental agreement information, rent payment data, security deposit data and terminations of rental agreements
- the identification data of the guardian who signed the rental agreement on behalf of an underaged tenant
- complaints, feedback and other communication, messages and actions related to the customer relationship or other appropriate context, including recorded phone calls
- the marketing measures targeted at the data subjects, their use and the information given in connection to them
- bank account data related to the termination of rental agreement
- potential direct marketing permissions and prohibitions.

Special groups of personal data

Information related to special groups of personal data 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 their religion or beliefs.

Additionally, personal data related to the apartment applicant's health and income or wealth are included in special personal data. Processing this personal data is necessary to us based on legislation, such as when selecting tenants based on the Act on the Use, Assignment and Redemption of State-Subsidized (ARAVA) Rental Dwellings and Buildings (1190/1993).

In connection to founding, maintaining or terminating a customer relationship, we process special personal data groups (high risk data), if the processing of such personal data is based on one of the above grounds for data processing.

We can also process data of personal data in special groups if it is related to protecting the vital interests of the data subject or when compiling, presenting or defending a legal claim.

We can receive data containing special personal data groups from a data subject if the data subject voluntarily discloses it to us for the purposes of tenant selection, for example, or if we receive the information from an authority managing the data subject's affairs or if the data subject otherwise discloses this data to us unprompted.

We may also gain access to special personal data in connection to camera surveillance.

Regardless of the method in which the information related to special data groups has been received or disclosed, we will process them with focus on confidentiality.

7. Regular data sources

Personal data is collected from the data subject through channels such as their apartment application, the electronic services they use, based on their consent and/or from information disclosed by them on the basis of the agreement they have signed.

Personal data can also be collected and updated from other personal data registers maintained by the Joint Controllers, the partners of Joint Controllers and authorities and companies providing personal data services in accordance with the data protection legislation.

8. Storage period of personal data

The personal data of people who have submitted an apartment application will be stored for three (3) years after the application has been submitted, unless a rental agreement is signed with the applicant.

Data based on a rental agreement will be stored for as long as the rental agreement between the data subject and the Joint Controller(s) remains valid, and ten (10) years after this or longer when necessary, after the rental agreement has been ended and the obligations related to the rental relationship have been completed by all parties.

The personal data of data subjects can be stored either in paper or electronic format, depending on the Joint Controller(s) policies valid at the time.

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 Privacy Notice.

9. Data disclosure and transfer

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

Key receivers and/or processors of personal data from the Joint Controllers are:

- collaboration partners
- contract partners, such as property maintenance companies
- IT service providers, such as companies in the Visma Group, Microsoft
- marketing service providers.

However, personal data can be disclosed and transferred to service providers used by the Joint Controllers 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 to, for example, contract partners performing debt collection on behalf of the Joint Controllers as well as parties that are legally entitled to the data.

Additionally, personal data can be disclosed or transferred to maintenance, security and locksmith companies, construction contractors and electricity and data network suppliers for supplying services related to housing or for other service providers utilised by the Joint Controllers for a certain purpose at any time.

If a party external to the Joint Controllers assumes ownership of the apartment, the Joint Controller(s) may disclose the data necessary for maintaining the rental contract to the apartment's new owner.

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 data protection officer as a written and signed document. The inspection request can also be made in person by visiting the Joint Controller(s).

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 requests 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 Joint Controller(s).

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 the 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(s) data, which is processed based on their consent, the data subject holds the right to receive such information usually in a machine-readable format, as well as 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 <http://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 Joint Controller(s). A data subject has the right to object to the processing of their data if the data subject has a special reason for this related to their personal situation.

12. Other

We do not perform automated decision-making or profiling, excluding automatic search for credit background information when processing an apartment application.

We perform profiling to the extent that we process the credit information of apartment applicants with the help of automated information management. When an apartment applicant submits their application to the Joint Controller(s), we will automatically check the applicant's credit information from the electronic systems of service providers maintaining credit data.

In connection to checking the applicant's credit information, we will receive information about their credit background in accordance with the legislation related to credit information.

The credit information will be used for processing apartment applications so that they may influence whether the apartment will be granted to the applicant. The credit information will only be used in the context of processing an apartment application.

Processing personal data is our legislated duty, for example when we select tenants for the state-subsidised apartments in accordance with the Act on the Use, Assignment and Redemption of State-Subsidized (ARAVA) Rental Dwellings and Buildings (1190/1993) and when we lease apartments in accordance with the Act on Interest Subsidy for Rental Housing Loans and Right of Occupancy Housing Loans (604/2001).

Processing personal data is an obligation based on an agreement in cases such as when we are processing the data subject's personal data based on a rental agreement in order to provide our services to the data subject.

If we require the data subject to deliver their personal data to us, but the data subject does not supply the data, we cannot offer or lease an apartment to the data subject. In such cases, we are not liable for any direct or indirect consequences the data subject may encounter due to their failure to supply their personal data.

This privacy notice only applies to data processing performed by the Joint Controllers, and the data subject must familiarise themselves with any potential third-party data protection policies.

We request data subjects to contact us via email at tietosuojavastaava@tvv.fi in case they need any additional information about the data protection policies of the Joint Controllers 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 17 August 2023.