

## Customer data processing activities

Processing of customer data in the Finnish operations of the SATO group

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### 1. File controller

SATO Corporation (on its own behalf and on behalf of companies in the SATO group, hereinafter SATO)

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Contact person:

Compliance Officer Riitta Salo  
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### 2. Names of data files

- customer relationship management
- marketing and communication
- camera surveillance
- photo archive

### 3. Purpose and legal basis of processing of personal data

SATO divides personal data into information relating to the establishment and management of customer relationships and tenancies, information relating to the sales of homes and commercial premises (customer relationship management), information relating to marketing and communications as well as camera surveillance. SATO has also a photo archive that includes photographs of various sessions and events.

Agreements can only be concluded with customers who provide us with the required personal data.

All personal data are kept confidential.

#### **Customer relationship management**

The purpose of the processing of personal data is to establish, manage and develop a customer relationship, such as renting and sales of homes, parking spaces and commercial premises, the provision of housing advice, resident participation and the management and development of related business and housing supply and attending to the rights and obligations of the landlord or home seller.

The processing of personal data related to the establishment and management of customer and tenancy relationships, customer panels, housing counseling, residential democracy, housing sales, housing investment and marketing is based on a valid or earlier contractual relationship.

The legitimate interest is related to SATO's business interests, such as quality control of services, development of services and housing supply and customer satisfaction measurement and direct marketing. The legitimate interest is also associated with risk mapping and management, the protection of SATO's rights and assets, the implementation of physical and data security and the transfer of data between SATO Group companies. Based on the legitimate interest of SATO and the Customer to prevent or detect abuse, we may save a copy of the identification document of the Customer, his / her agent or his / her assistant to the Customer's information to ensure the reliable identification of that person.

We may record the imposition of international sanctions and the prohibition on doing business based on SATO's legitimate interest or a statutory obligation.

In managing the rent receivable and accounts payable ledgers, we required the customer's personal data for the invoicing and collection of rents, usage charges and other invoices and purchase price instalments and in the related services based on a contractual relationship.

We also process personal data in the context of the maintenance of rented homes, commercial premises and properties, in responding to defect reports, in the management of lease agreements and in the context of warranty inspections of homes sold. Your personal data are required in defect report, repair, inspection and change situations related to apartments as well as in the management of lease agreements and in service provision based on a contractual relationship.

If you are a SATO resident, your personal data may be used in the list of names at the entrance to your building, on door nameplates, on the sauna and laundry room turn lists and for equivalent purposes. Personal data may also appear in apartment-specific energy and water consumption monitoring and in other measurements relating to building systems. We may take photos in your home for renting it in the future and monitoring the condition and maintenance of the apartment, but we do not photograph people in your home without your consent.

In addition, we have a service channel OmaSATO (at oma.sato.fi). OmaSATO channel is intended as a residential service channel, where we offer the opportunity to view and modify your personal data (limited). The channel also serves as a communication instrument and as a supply channel for housing related services.

The information provided by you in the context of applying for a rental home or rented commercial premises or making an expression of interest in a home for sale (=reserving the chance to buy without making a deposit) is equated with information relating to contractual relationships.

### **Marketing and communication**

SATO markets rental and owner-occupied apartments and housing-related services to its tenants on the basis of a valid or earlier contractual relationship and with those who consider renting or purchasing the dwelling, based on the consent or legitimate interest of SATO.

Housing-related services may include, for example, Find a home search engine, a residential panel, parking and travel, furnishing, broadband, wellness and home entertainment services, electricity and home insurance, cleaning and garment maintenance, and grocery shopping. The service provider may be SATO or another company. SATO also sends to its customers newsletters, event invitations and similar newsletters, which include, among others, information on current issues related to your home and living.

The SATO Pulse residents panel is a survey channel which besides marketing also serves the needs of development. The data in the data file are used for customer surveys and opinion polls, the results of which are used in support of SATO's business.

SATO's Internet services include a live chat service.

We use our data and cookies to find out what kind of things you appreciate in your living.

In marketing apartments and managing customer relationships, we need the customer's personal data in managing the service and maintaining basic information.

The processing of data relating to our marketing may take place in accordance with our existing or previous contractual relationship, based on a legitimate interest in SATO's business or on the customer's existing consent.

SATO can market its services, for example, on its website and otherwise in public at any time.

Direct marketing (such as a letter or a call) may be based on our contractual relationship or SATO's legitimate interest, but you have the right to oppose direct marketing at any time, so SATO will no longer target you direct marketing. You can, for example, make a statement of opposition to the e-mail at [tietosuoja@sato.fi](mailto:tietosuoja@sato.fi).

For electronic direct marketing (such as e-mail or SMS), we need your prior consent to use the electronic message channel. You can give or cancel your consent for example by emailing it to [tietosuoja@sato.fi](mailto:tietosuoja@sato.fi).

When SATO informs its customer for example about future repairs or a water outage, it is not marketing, but managing a customer relationship, and does not require the customer's consent but is based on a contractual relationship. Such communication may take place by post, telephone, SMS or e-mail.

### **Camera surveillance**

In order to safeguard security and legal protection, we may collect camera surveillance data in SATO's premises and properties and on their grounds, such as in the vicinity of entrances, at refuse collection points and in parking garages. The data are used to investigate criminal offences and incidents of damage, and when necessary to security control. Visible signs to indicate camera surveillance are placed in the premises and areas where cameras are located. Camera surveillance is based on the legitimate interest of SATO and the customer.

### **Photo archive**

Photographs can be taken at sessions and events organized by SATO. Photographs can be used in SATO's publications, but they do not include the names of the customers. Photos represent a group of people where nobody is emphasized. Only with your consent we can publish a photo

that expressly shows you. The use of a photo archive is based on SATO's legitimate interest as a trader.

### **Automatisation**

We may classify registered customers automatically on the basis of certain pre-determined criteria in order to improve the efficiency of leasing, to target marketing and communication as well as to interpret the results of surveys and polls. The classification is never based on the use of specific personal data. This is how we develop renting, housing supply and services more efficiently. We can use automated processes in decision-making related to the choice of tenant housing. The applicant for a rental apartment always has the right to demand that his / her application be handled by a natural person.

### **Strong electronic identification**

If you have access based on strong identification to your personal data in SATO's information systems (OmaSATO), in part or in full, we collect log data in compliance with data protection norms for the purpose of system use management. This safeguards both your legitimate interests and those of SATO in the event of any problems.

When using strong electronic identification services and when making electronic signatures, you must provide the identity service provider the personal information it needs and act according to the instructions provided by the service provider. The service provider acts as a controller for the personal information you provide to it.

## **4. File data content**

### **Customer relationship management**

The following data may be recorded in the customer relationship management and sales systems about applicants for rental homes, lessees, co-lessees, co-payers, other persons to reside in the apartment and persons expressing interest in and purchasing homes as well as commercial premises and parking space lessees:

Person's name, date of birth, personal identity code, address, previous address, phone number, email address, IP address, communication language, material language, travel document data, identity document or details of residence permit, guardianship details if applicable, gender, occupation, employment status, employment duration and type, household form, credit and payment history data, housing allowance data if applicable, sanction compliance data, data concerning current home, marital status, data on non-disclosures of data ordered by the authorities, housing application and lease agreement data, deed of sale data, data on payment of rent, other tenancy-related charges or purchase price, security deposit data, profiling prohibition in marketing, other contact details if any, other data supplied by the customer, and participation in activity organised by SATO as well as information about your possible consents and withdrawals, as well as information about your registered requests and any limitation or objection to the processing of your data. We can also record observations related to your skills in neighborly and in home care, as well as remarks concerning customer leaving prediction.

Key and access data may be recorded and processed in respect of homes and commercial premises equipped with an electronic locking system. In addition, we may record data required under the Act on the Contractor's Obligations and Liability when Work is Contracted Out and the Act on the Prevention of Money Laundering and Terrorist Financing and international sanctions.

Also, if necessary, a copy of the identification document of the customer's assistant or agent can be taken and stored in the customer information system in connection with the customer's data.

Communication between customers and SATO employees may be recorded. We may also record data entered by SATO employees regarding service measures.

Data on invoicing, payment and collection events are recorded in the accounts payable and receivable systems.

We may record the names and dates of birth, and in respect of persons 16 or older, also the personal identity codes of any other persons to reside in the apartment. Such persons include all those who move into the apartment, the residents of apartments rented for employee accommodation, and persons subletting in part or in full.

### **Special and sensitive personal data**

We can save a personal identification code of our leasing contractor or other contractor or other person in need of leasing on the basis of the Privacy Act (1050/2018).

Special or High-risk data under the EU Data Protection Regulation include ethnic origin, political opinions, religious or philosophical beliefs, membership of a trade union, genetic or biometric data, health information, sexual behavior and orientation, and criminal convictions and offenses information.

We strive to avoid high-risk data recording and processing, but if you have self-reported such information, for example, for tenant selection, or we get information from an authority, we can store and process such information in accordance with enhanced confidentiality. We may also get special personal information unintentionally in connection with camera surveillance. Special personal information is not used for customer profiling.

Information about the customer's financial position and life situation (sensitive information) is dealt with enhanced confidentiality.

Data on international sanctions and business prohibitions can be recorded to secure SATO's legitimate interest or on the basis of a statutory obligation.

### **Marketing and communication**

Before any application or expression of interest is submitted, we may for marketing purposes collect the customer's name, address, occupation, communications language, income data, life situation data, phone number, email address, IP address (network adapter address), age, marital status, data about interests and possibly also other contact details, and participation in activity organised by SATO. We can also record opinions and comments expressed by people in the SATO Pulse residents panel and conversations saved in the chat service.

We also provide customer benefits that are provided to you by a non-SATO company. If you use customer benefits, you give your data to the company. We can only give your data to a company that provides customer benefits if you explicitly consent to it.

### **Data systems**

To manage the use of data systems (such as OmaSATO), we can collect from the customer an IP address, access rights and limitations of data access, the name and e-mail address of the user, user IDs and passwords, other identifiers such as pin codes, and log data stored when using information systems.

### **Camera surveillance**

Camera surveillance data contains data on the persons present in the area covered by the surveillance cameras, at SATO's premises and real estate as well as in their courtyard, such as in the vicinity of the entrances, waste disposal points and garages. In addition to video footage, the data file also includes the date and time of the images recorded. Our camera surveillance does not record audio. The data file is made up of the transmitted digital recordings made when the cameras placed by SATO at necessary locations are in operation.

### Photo archive

Photographs of the audience may be taken at public events, however, the names of the persons present in the photographs shall not be recorded with the photograph unless otherwise agreed with the person concerned. Such photographs can be published in releases and newsletters. For marketing purposes, no person-specific photos are used without the explicit consent of the people therein.

### Cookies

Cookies and similar online analytics tools (cookies) can collect data, for example, which page you have moved from, what web pages you have browsed, when and what browser you use, your screen resolution and operating system, and what is your computer's IP address, that means the internet address from where you have sent the data and to where they are received.

With the cookies, the number of visitors to the service can be monitored by SATO and analysed and developed to better serve the visitors. In addition, SATO may use cookies to target marketing, to collect information about visitor visits on different sites, and IP addresses. The information gathered through cookies is used to generate targeted marketing based on the visitor's interests. For example, information gathered with cookies can be linked to a customer's email address for targeting marketing.

The visitor has the ability to prevent the use of cookies by changing the settings of his browser so that it does not allow cookies to be stored. The visitor agrees that, for some services, the use of cookies may affect the functionality of the service.

We do not use the profiling information collected through cookies as a basis for decision-making on you.

When you are on the Internet, please, note that other service providers may also collect cookies. In this case, they are responsible for the privacy of the cookies they collect.

## 5. Regular sources of data

Our regular sources of data are the data provided in the context of applications to rent a home, parking spaces or commercial premises, the conclusion of lease agreements, the expression of interest in buying a home, the signing of a deed of sale, during the tenancy and for marketing purposes.

We collect data from you and your cohabitants/flatmates or business associates in the context of using sato.fi services, in communication and customer service situations and apartment visits. We also collect data from people who submit a rental application or express interest in a home for sale. Data may also be provided by a real estate or rental agent. We can record the information we receive from you via the OmaSATO channel and chat conversations. When you use our services, the use of their content will be saved.

When we are acquiring a rental home or an entire building of rental units, the seller provides us with data on the tenants and residents to be recorded in our own systems.

Data may also be collected e.g. when you take part in campaigns or events organised by us. Photos can be taken from the audience at events.

Data are updated on the basis of sources such as notifications and events during tenancy. With regard to notifications, the data source may also be a third party, in which case we strive duly to ascertain the correctness of the data. We can also obtain information on the basis of contacts related to apartment sales.

We may verify the correctness of personal data from the Population Register in the context of applications to rent and expressions of interest in buying a home. We may also verify resident data

on the apartments owned by us from the same source. Personal data may furthermore be collected and updated on the basis of information obtained from our partners as well as authorities and enterprises providing services relating to personal data.

Credit and payment history data as well as sanction compliance data may be collected and updated from sources including the data file of Suomen Asiakastieto Oy while housing allowance data may be obtained from Kela.

Any data collected for the purpose of information system usage management (like OmaSATO) are obtained from you, and the user IDs and passwords are created and administered by our employees. Log data are automatically recorded in the context of information system usage.

IP address and cookie data are collected from you in the context of sato.fi service usage.

The camera surveillance data file is made up of the transmitted digital recordings made when the cameras placed by SATO at necessary locations are in operation. We can collect camera surveillance data to ensure security and legal certainty in SATO's office buildings and real estate as well as in their yard, such as in the vicinity of the entrances, in waste disposal points and garages. Camera surveillance data are recorded automatically when someone enters the area under surveillance when the camera is in operation.

## 6. Data disclosures and data transfers

SATO does not publish the data collected by it and complies with the obligation of secrecy in respect of personal data unless otherwise required by legislation or the establishment, exercise or defence of legal claims or otherwise mentioned in these records.

The data referred to in this data file description are not transferred outside the SATO group with the exception of contractual partners carrying out specific duties (e.g. customer relationship management or service provision and developing, letting, translator service, sales of homes or other premises, property management services, construction or repairs and their supervision, security control, customer data supplementation or collection in part, or information system and data security development). These partners are bound by a secrecy obligation and a data protection agreement. Data may also be transferred to parties which under legislation have the right to obtain the data. The data protection agreement provides for matters including the standard of information security and reporting of information security breaches between SATO and the contractual partner, in accordance with the EU General Data Protection Regulation.

The Housing Finance and Development Centre of Finland (ARA) in respect of ARA-subsidised rental homes and the City of Helsinki in respect of Hitas homes act as the supervisory authorities which have the right to obtain the data required for supervision. Data may also be disclosed to the City of Helsinki for the purpose of performing draws on the allocation of Hitas homes. KELA has the right to obtain data on persons to whom it pays benefits.

The photos of audience taken at SATO's events may be used as an illustration of SATO's publications within the limits permitted by law.

The data in the camera surveillance data files or log data may be disclosed to the police, other competent authority, or, on the basis of a business license, to a security service provider for the purpose of investigating suspected offenses and abuses.

When SATO disposes of a rental home or building of rental units, the valid data on its residents and tenants can be disclosed to the buyer of the home or building.

We also provide customer benefits that are provided to you by a non-SATO company. If you use customer benefits, you give your data to the company. We can only transfer your data to a company providing customer benefits if you expressly consent to it.

Where cloud service providers operate, data may be transferred outside the European Union or the European Economic Area to the United States or other country where the system vendor or its subcontractor operates. The transfer of all personal data outside the European Union or the European Economic Area is subject to the standard terms and conditions agreed by the EU Commission or to any other policy defined by the EU Data Protection Regulation.

## 7. Links to third-party websites on SATO's websites

SATO's websites – sato.fi and kotona.fi – may offer third-party links. By clicking on such a link, you may receive third-party customer benefits and services and take part in contests and draws arranged by them. Our partners may use cookies which collect data on your visits to sato.fi and other sites in order to target advertisements.

SATO shall not be held liable for any collection or processing of personal data thus carried out by third parties. In these situations, you yourself disclose your data directly to the third party, for example to receive services or customer benefits or to take part in a contest or draw.

SATO may provide your data to third parties providing customer benefits only with your express consent.

## 8. Period of storage of personal data

The stored data in the Find A Home search engine on SATO's website will be deleted from the register no later than three calendar years after you were last time active in the search engine on SATO's website or related services, provided that there is no other legal basis for keeping your data, such as application for a rental home or reservation act for the sale of owner-occupied dwellings.

Your consent to use the online direct marketing channel is valid until you withdraw your consent. After withdrawal of your consent, your data will not be used for online direct marketing.

You may also withdraw any other consent you have given to the processing of your data. If there are no other legitimate grounds for processing your data, your data will be deleted without undue delay.

Information about your consent and its withdrawal, as well as your contact information, will be retained for a maximum of six years after the withdrawal of the consent, provided that you have not submitted a rental application or reservation to SATO.

The data of those who have submitted a rental application or given to SATO an expression of interest to buy can be stored for a period of six years from the date of the most recent one of these unless the customer has concluded a lease agreement or purchased a home.

Payment defaults information will always be deleted at the latest six years after the lodging of the housing application.

Data relating to a lease agreement or home purchase may be stored for ten years from the expiration of the lease agreement, conclusion of the home purchase, and mutual completion of the obligations relating to the tenancy or home purchase. The same storage period applies to all persons who reside(d) in the home as well as recorded phone calls and other dialogue/communication with you. The data associated with participation in the resident panel will remain the same time as the lease agreement.

Photos can be stored for active use for up to 10 years after taking the photo and for archival and history purposes permanently.

Camera surveillance data are stored for the amount of time found necessary when they contain data based on the purpose and under investigation. Data under investigation are stored for the period of time needed for the establishment, exercise or defence of legal claims. When the need

for storage of the data comes to an end, the data are removed within three years. Otherwise the data are regularly destroyed by being recorded over within no more than a year of initial recording.

Any information system usage management data and log data on the use are stored for maximum six calendar years from the removal of access rights.

Data collected by means of cookies are stored for a maximum of four years depending on the nature of the cookie.

## 9. Principles of data file protection

Only designated representatives of the personnel of SATO or a contractual partner selected by SATO who have a legitimate need to access the data for work have the right to access the systems containing personal data and to process the data held in the systems. The use of personal identifiers is required. The system is protected through technical and administrative means.

**A. Manual data / storage location and protection:** Data are stored in locked and supervised premises. Access is restricted to persons designated by the SATO.

**B. Electronically stored material / Principles of right of access to data, access control and physical protection of hardware:** Data are only accessible by persons designated by the SATO Group. The access rights to a data file are determined individually for each position. SATO's internal processes are observed in the determination of access rights. The databases and data networks used to store data are protected by means of organisational and technological measures. The supervision and protection of data files complies with regulations applied within the EU.

## 10. Right of access to own personal data

You have the right to receive from the file controller, i.e. SATO, confirmation as to whether personal data concerning you is being processed.

You have the right to access your personal data. You may request the right of access from SATO in person or in writing. Written requests should be submitted to our customer services by email: [asiakaspalvelu@sato.fi](mailto:asiakaspalvelu@sato.fi) or by post to SATO Customer Services, PO Box 401, FI-00601 Helsinki, Finland. You can also check with your OmaSATO channel for information about yourself.

You can personally contact us in SATO's headquarters in Käpylä, Helsinki, or at the SATO service centers in Helsinki City, Tampere or Turku, the addresses of which you can find on SATO's website at <https://www.sato.fi/en/contact-information>.

We do not disclose photos, camera surveillance data, cookie information and system usage log data because these materials would contain the personal data of other people or disclosure would be unduly burdensome.

We comply with access requests without delay and no later than within three months of the submission of the request.

The data will be supplied to you in single copy in person against verification of identity, or by other protected means using reliable identification. Requests submitted electronically will be complied with electronically when possible in terms of information security.

If the request for access is manifestly without foundation or unreasonable, and especially when the requests are made repeatedly or if more than one copy is requested, as controller we may charge for compliance with the request a reasonable fee, based on administrative costs, or refuse to comply with the request.

## 11. Rectification or removal of personal data and right of data subject to request restriction of processing

You may request the rectification of incorrect data. The decision on rectification is made by us. We may rectify incorrect data detected after receiving the correct data from you or another reliable source.

In so far as you are capable of taking personal action, for example on the OmaSATO channel you must, without undue delay after having been informed of or having personally detected an error, on your own initiative rectify, remove or supplement personal data contained in the data file that is inconsistent with the purpose of the data file, incorrect, unnecessary, incomplete or obsolete. You are responsible for keeping any personal user ID confidential and for any usage taking place with the personal user ID.

You have the right to have the personal data concerning you erased from the data file ('right to be forgotten') after the end of the storage period if your personal data are no longer needed for the purposes for which they were collected, you object to processing for which there are no legitimate grounds, consent is withdrawn in respect of processing based on consent, or the personal data have been unlawfully processed or SATO is obligated under law to erase the data. As file controller, SATO in compliance with legislation in force from time to time decides on the erasure of data without undue delay.

You have the right to ask SATO to restrict the processing of your personal data when

- a request concerning rectification or removal of your data is pending;
- the processing of the data is unlawful and you object to the erasure of your personal data, asking instead that the processing of the data be restricted;
- SATO no longer needs the said personal data for processing purposes but you need the data for the establishment, exercise or defence of a legal claim;
- you have objected to the processing of the personal data pending the verification whether the legitimate grounds of the controller override yours (the balancing test).

When processing is restricted on the aforementioned grounds, such personal data may, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

## 12. Right to object to processing on grounds relating to your particular situation

You have the right, on grounds relating to your particular situation, at any time to object to us processing your personal data pursuant to the legitimate interest of the file controller.

The objection specifying the grounds on which you object to the processing may be submitted to the contact person of the file controller in this data file description (page 1). SATO may refuse to comply with your objection on grounds laid down in legislation after completing the necessary balance test between your and SATO's legitimate interests.

## 13. Right to prohibit direct marketing

Where personal data are processed for direct marketing purposes, you may at any time object to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. If you object to the processing of your personal data for direct marketing, the data may no longer be processed for that purpose.

#### 14. Right to withdraw consent

You have the right to withdraw your consent to the processing of your personal data at any time to the extent that the processing is based on your consent. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. You also have the right at any time to prohibit the use of electronic channels in direct marketing addressed to you.

#### 15. Automated decision-making

In selecting residents for rental homes, we comply with the instructions of authorities and the statutory grounds for resident selection as well as by SATO defined methods to intensify selection of residents. The process may entail automated decision-making. You have the right to obtain human intervention on the part of SATO. You also have the right to express your point of view and contest the automated decision.

#### 16. Right to data portability

You have the right to have the personal data concerning you, which you have provided to SATO and which are processed by us on the basis of your consent or a contractual relationship, transmitted in machine-readable format to another controller when this is technically feasible and data secure.

If the transfer is not technically feasible or data secure, you may yourself supply another controller with your personal data which you have received on the basis of the right of access.

#### 17. Right to complain to a supervisory authority

You have the right to file a complaint with the competent supervisory authority in the EU Member State where you have a permanent place of residence or workplace or where the suspected breach of the Data Protection Regulation has occurred. The competent authority in Finland is the Data Protection Ombudsman (Ratapihantie 9, PO Box 800, 00521 Helsinki or email: [tieto-suoja@om.fi](mailto:tieto-suoja@om.fi)). For more information, visit the Privacy Policy page [tietosuoja.fi](https://tietosuoja.fi).

#### 18. Contacts

##### **Is there still something you would like to know?**

We will be happy to help you with any questions relating to the processing of personal data or the exercise of your rights. Please contact us in writing by either email or post. For contact details please see under section 1 'File controller'.