

1. Controller of the data file

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2. Matters relating to the data file:

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3. Data file name:

POAS Data File Based on Client Relationship or Other Relevant Connection

4. The purpose for which the personal data is used:

The data is processed to manage, handle, analyse, and develop a relationship which is based on a client relationship or other relevant connection such as, for example:

- maintaining the client's data
- maintaining the rental payments ledger
- client surveys, eg. client satisfaction research
- maintenance of the apartments and providing the data necessary for this task to those maintenance companies which have a contract in place with the controller of the data file
- collecting rent owed or other debts arising from the leasing out of rooms
- termination of the lease contract
- In addition to client communications, personal data can be used for the planning and development of the controller's business.

5. Data file contents

The following personal data and changes to that data regarding people who are applying for a lease, recommended clients, tenants, and possible co-tenants can be processed as part of the data file:

Basic data such as:

- name
- ID number
- contact data (postal addresses, phone numbers, email addresses)
- gender

data which is relevant to client relationship or other relevant connection, such as

- client number
- the start date for the client relationship
- the number of persons living in the same household
- the first and last name and ID number of a live-in partner or spouse who is living in the same household
- the first and last names and ID numbers of all persons who are living in the same household
- the first and last names and ID numbers of all persons who are living in the same household with the consent of the data subject.
- data on permission given to the data subject by a co-applicant to share the co-applicant's personal data with the controller
- data regarding a guardian, if applicable
- data on employment status and the nature and duration of the contract
- income and assets data
- credit reference data
- data on debt adjustments
- data on debt collections
- data on the apartment prior to becoming POAS client
- data on the need for an apartment
- lease contract data, ie. contract terms, payment information, security deposit information, and information on the termination of a lease contract
- in cases in which the client is a minor, the identifying data of the guardian who signed the contract
- reclamations, feedback, and other communications and actions which are relevant to the client relationship or other relevant connection, including phone call recordings

- marketing actions which are targeted at the data subject, the use of such actions, and the data collected through them
- bank account details for terminating the lease contract
- direct marketing permissions and prohibitions

6. Regular sources of data

Data is collected from the data subject via various methods, including the apartment application form and online services.

Personal data can also be collected and updated using data which has been obtained from other personal data files that are accessible by the controller, such as clients terminating their contracts, the controller's partners, and from authorities which are providing personal data services, such as the Population Register Centre or, in cases requiring credit reference data, Suomen Asiakastieto Oy.

7. The disclosure and transfer of data

As a general rule, no data will be disclosed to any party outside of POAS. However, data can be disclosed according to the legislation in force at the time, eg. to partners who are contracted for debt collection services and parties which, according to legislation, have the right to access the data. In addition to this, data can be disclosed to property management services, security and locksmith companies, as well as electrical companies or data service providers, for the purpose of delivering residence-related services.

If an apartment becomes the property of a party who is outside of POAS, then POAS can disclose to the new owner that data which is necessary for managing the lease.

No data shall be transferred outside of EU member states or outside the European Economic Area.

8. Data file protection

Data in the file that is processed by digital means is protected by firewalls, passwords, and other necessary technological methods which are currently generally accepted in the field of information security.

Records that are kept manually are stored on premises to which outsiders are not admitted.

Only the controller's specified employees or the employees of companies which have been contracted by the controller, and who have signed a confidentiality agreement, are authorised by the controller to have individual access to data that is stored in the data file.

9. The right of access, the right of rectification, and the right to prohibit access

According to the Personal Data Act, the data subject has the right to access any data on them which has been stored in the data file. Any request for access should be sent in writing to the person who is in charge of the personal data file. The request must be signed by the data subject. The request for access can also be made in person on the controller's premises.

By contacting the controller, the data subject has the right to forbid the processing of data on them and the disclosure of such data for the purposes of direct advertising, distance selling, or other direct marketing of market and opinion surveys.

When contacting the controller, the data subject has the right to demand that incorrect data be rectified.