

## Description of Customer Register

### 1. Data controller

Pirkan Opiskelija-asunnot Oy (business ID: 0211539-7)  
Sorsapuisto 1  
33500 Tampere  
Tel. 040 668 6008

### 2. Person responsible for register

Timo-Juhani Pimiä  
Sorsapuisto 1  
33500 Tampere  
Tel. 040 668 6008  
toimisto@poas.fi

### 3. Name of register

Visma Tampuuri customer register, derived from customer relationships or other relevant contact with POAS.

### 4. Purpose of use of personal data

Personal data are processed for the purpose of administration, management, analysis and development of the customer relationship or other relevant contact, including but not limited to:

- storing the customer's details, managing the tenancy agreement
- bookkeeping (accounts payable and receivable) for the tenancy agreement
- customer surveys, e.g. customer satisfaction questionnaires
- maintenance of residences and, in relation to this, sharing of the necessary data between the data controller and contractual partners
- collection of rent and other tenancy receivables
- termination of tenancy agreements
- besides customer communications, personal data may be used for the data controller's business planning and development

## 5. Data content in the register

The following personal data and their modifications pertaining to housing applicants, recommended customers, tenants and possible co-tenants may be processed in the register:

### Basic details

- name
- personal ID
- contact details (postal addresses, telephone numbers, email addresses)
- gender

Data related to the customer relationship or other relevant contact, such as:

- customer number
- start and end date of customer relationship
- number of members in the household
- names, surnames and personal IDs of all adults residing in the same household
- with the data subject's consent, names, surnames and personal IDs of minors residing in the same household
- information on the consent given by the co-tenant to the data subject concerning the release of the co-tenant's personal data to the data controller
- information on guardianship, if applicable
- place, duration and type of studies
- information on employment, including duration and type
- income and assets
- credit rating
- debt arrangements
- debt collection
- information on preceding place of residence
- information on housing needs
- tenancy-related information, i.e. tenancy agreement details, rent payment and deposit information and details of termination of tenancy agreement
- in the case of an underaged tenant, personal details, personal ID, contact details and credit rating of tenancy agreement's signatory guardian
- complaints, feedback and other communications and actions related to the customer relationship or relevant contact, including phone call recordings
- marketing actions targeted at the data subject, as well as their use and data provided in relation to them

- bank account details for termination of tenancy agreement and repayment of deposit
- direct marketing consents and opt-outs

## 6. Regular data sources

Data are collected from the data subject via the housing application form and electronic services, among others.

Personal data may also be collected and updated from the data controller's other registers, from customers who have given notice, from the data controller's business partners and from authorities and companies offering personal data-related services, such as the Digital and Population Data Services Agency, as well as credit rating details from Suomen Asiakastieto Oy's credit information register.

## 7. Disclosure and transfer of data

As a rule, data are not disclosed to parties outside of POAS. Within the scope permissible and required by law, data may be disclosed for example to contractual partners carrying out debt collection on POAS's behalf, or to other parties who are entitled by law to receive the data. Data may also be disclosed to property management, servicing, security and locksmithing operators, as well as to power and data communication companies for the provision of housing-related services.

If ownership of the residence is transferred to a third party, POAS may disclose the data necessary for managing the tenancy agreement to the new owner.

Personal data are not transferred to outside of the European Union or European Economic Area.

## 8. Register security

The electronic customer register is located on the servers of the service provider, Visma Tampuuri Oy. Visma Tampuuri Oy is responsible for the protection of the data on the server. POAS is responsible for ensuring the proper processing of the data in the register, as well as for the personal identifiers and passwords of the processors.

Electronically processed data in the register are protected by firewalls, passwords and other applicable technical means that are generally accepted in the data protection sector. The customer's data are stored in the register until the

end of the tenancy agreement, after which they are transferred into a historical data log. Historical data are stored for six years. Data related to deposits and rent payments are stored in the register for six years (in the manner of accounting materials). Notices of termination are archived in the system and stored for six years. After the storage period, all documents are appropriately destroyed.

Manually stored and updated data are located on premises that cannot be accessed by unauthorised personnel. Non-electronic documents are stored for six years after the termination of the agreement.

Only individually authorised employees of the data controller and of companies acting on the data controller's behalf or behest, or other persons under these parties' control, such as interns, who have signed non-disclosure agreements, may access the data in the register, using a personal authorisation granted by the data controller.

## **9. Right of access, erasure and rectification**

In accordance with the Finnish Personal Data Act, data subjects have the right to access the personal data related to themselves in the register. The access request must be sent, in writing and undersigned, to the person responsible for the register. Requests to access data may also be made in person on the data controller's premises.

Data subjects have the right to forbid the processing and disclosure of their personal data for purposes of direct marketing, distance selling, or market and opinion surveys, by contacting the data controller.

Data subjects have the right to demand that incorrect data pertaining to themselves be rectified, by contacting the data controller.