

# S-Bank Group Real Estate Lease Privacy Statement

## 1. Data controller and data controller's contact information

Each company belonging to S-Bank Group (hereinafter S-Bank) or a real estate fund managed by S-Bank Group, which directly or indirectly owns or manages real estate, independently maintains the personal data register described in this privacy statement.

Postal address: Mikonkatu 9, 00100 Helsinki, Finland.

Street address: Mikonkatu 9, 00100 Helsinki, Finland.

## 2. Data Protection Officer's contact details

S Bank Group, Data Protection Officer

Postal address: S-Bank Plc, P.O. Box 77, 00088 S-RYHMÄ

Email: tietosuojavastaava@s-pankki.fi

## 3. Name of register

S-Bank Group's personal data register for real estate leasing

Data subjects are natural persons, as well as natural persons acting on behalf of legal persons, who are or have been tenants in properties directly or indirectly owned or controlled by the controller.

Data subjects may also include potential tenants; natural persons; and persons acting on behalf of an organisation or company with whom a lease agreement has been drafted.

## 4. Purposes of and legal basis for processing personal data

The processing of personal data is mainly based on a negotiated or valid or expired lease agreement at one of the properties owned by an S-Bank Group's real estate fund. Such processing of personal data based on a lease agreement includes invoicing and collection of rents. The processing may also be based on pre-contractual measures such as the offering of rental properties based on a natural person's or organisation's contact regarding renting, or the identification of a counterparty.

The processing of personal data may also be based on:

- A legal obligation of the data controller, such as informing tenants about property repairs affecting housing or operations, planned water or power outages, or maintenance of property equipment such as lifts.
- Legitimate interests of the data controller or a third party, such as satisfaction and market surveys, based on which the data controller may develop its business and services related to housing or the leasing of commercial properties. The data controller's legitimate interests are normally based on a contractual relationship or an equivalent relationship between the data controller and the data subject.

- The fulfilment of an agreement between the parties.

#### 4.1 Purposes of personal data

- Customer service, the management and development of a contractual relationship, including communication
- Carrying out statutory obligations and orders and instructions issued by the public authorities
- Provision, development and quality assurance of services
- Development of business operations
- Tracking and analysis of the use of products and services, and the segmentation of tenants, to enable the data controller to provide users with suitable services and personalised content in products and services
- Implementation of studies and the processing and analysis of results, and statistics preparation
- Direct marketing
- Targeting of advertisements and marketing
- Risk management
- Assurance of the safety of services and investigation of malpractice
- Training purposes.

#### 4.2 Prevention and investigation of criminal activities

Due diligence information and other personal data of the data subject can be used to prevent, expose and investigate money laundering and funding of terrorism, and to mount a formal investigation of money laundering, funding of terrorism and crimes whereby the property or funds that were the object of the money laundering or terrorism funding were acquired.

Personal data of data subjects can be used to investigate whether a person is subject to international sanctions applied by the controller.

#### 4.4 Legal bases for processing

Personal data is processed in the register on various legal bases.

Below is a description of the legal bases for processing of personal data that are used by the register and examples of processing carried out on each basis.

Legal bases for processing	
Legal basis	Example
Contractual relationship or measures that precede entering into an agreement	Measures based on an agreement such as a lease, or its conclusion and fulfilment
Statutory obligation	Statutory due diligence information about the tenant. This data may include information about tenants in accordance with the due diligence process referred to in the Act on Alternative Investment Fund Managers (162/2014), for example.

<b>Legal bases for processing</b>	
Legitimate interests of the data controller or a third party	<p>Marketing activities, and the development of processes, business and systems, require the processing of personal data. Personal data is processed in connection with marketing, product and customer analyses. This enables the controller to improve the product range and optimise the services offered to data subjects.</p> <p>The data controller's legitimate interests are normally based on a contractual relationship or an equivalent relationship between the data controller and the data subject. The data controller ensures that the processing mentioned here is proportionate in view of the interests of the data subject, and that this processing meets their reasonable expectations.</p>

## 5. Personal data categories

The personal data processed for the purpose of the register is divided into categories. You can find the personal data categories we process and descriptions of their data content below.

<b>Personal data categories</b>	
<b>Personal data category</b>	<b>Data content of the category</b>
Basic data	<p>Basic data, such as the data subject's</p> <ul style="list-style-type: none"> <li>• name</li> <li>• address</li> <li>• personal identity code</li> <li>• date of birth</li> <li>• telephone number</li> <li>• email address</li> <li>• citizenship, country of residence and country of taxation</li> <li>• position, profession</li> </ul> <p>In addition, the following information may be processed in the register:</p> <ul style="list-style-type: none"> <li>• basic information of a trustee, authorised person or equivalent person party to a customer relationship</li> <li>• basic information of a contact person, authorised representative or beneficial owners of a tenant that is a company or an organisation.</li> </ul>
Due diligence information	Due diligence information required by law, such as information necessary to identify the tenant, as well as to determine their financial position and political exposure, and whether they are subject to sanctions.
Consents	Consents and prohibitions given by the data subject concerning the processing of personal data.
Agreement and product details	<p>Details of agreements between the data controller and data subject.</p> <p>Information submitted or produced by the data subject when using services and products.</p>
Background data	For example, data concerning the life situation and financial position of the data subject
Content of recordings and messages	Records and messages in different formats, where the data subject is one of the parties, such as telephone call recordings or emails.

## 6. Personal data recipients and recipient categories

For example, personal data may be disclosed to entities that provide a security deposit, such as Kela, a bank or the parent company of the tenant company as the provider of the security deposit, as well as to a debt collection agency.

When required by law, personal data may also be disclosed to the authorities such as the municipal authorities in the case of interest-subsidised housing.

Personal data will also be disclosed if the controller sells the property or the shares that directly or indirectly entitle to ownership of the property to a third party. In this context, personal data necessary for past or future management of the lease will be disclosed.

When disclosing personal data in the register, the controller takes into account the requirements of legislation, including confidentiality obligations imposed on the controller.

S-Bank may disclose personal data, as permitted by law, within S-Bank Group, for the purposes of customer service and other customer relationship management, marketing and risk management of the Group and the financial and insurance cluster. In addition, personal data is disclosed to affiliated entities of S-Bank Group companies and contractual partners of the aforementioned parties, which are responsible for matters related to the contractual relationship (such as lease administration and invoicing), as well as S-Bank Group financiers and advisors.

## 7. Transfer of personal data

We use subcontractors to provide our services and in other banking activities. We transfer personal data to subcontractors to the extent required by the service they provide, and they process the data on behalf of the bank. Personal data is transferred to a limited extent outside the European Union and the European Economic Area. When data is moved to third countries, we use standard contractual clauses issued by the EU Commission or another transfer mechanism approved by legislation. You can read more about the standard contractual clauses on the EU Commission's website: [https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers\\_en](https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en)

Some of the subcontractors we use are other S Group entities. Among other things, they provide us with IT and other support services.

## 8. Personal data retention time and criteria for determining retention time

Personal data is processed during the validity of the contractual relationship or as long as necessary to meet the requirements of sector-specific legislation governing the financial sector.

The retention period is usually the duration of the lease or contractual relationship and 10 years from its expiry. At the end of the retention period, personal data will be erased or anonymised in accordance with the erasure processes of S-Bank Group.

After the contractual relationship ends, S-Bank may process personal data for direct marketing purposes, in accordance with applicable legislation.

## 9. Sources and updating of personal data

We collect your personal data from a service provider or partner company or directly from you. In addition, we can collect and update, as permitted by legislation, your personal data from registers of third parties, such as the Population Information System, the Trade Register and other public registers, and from data controllers of credit data registers.

We may obtain necessary information about your political exposure and for determining whether you are subject to international sanctions from third parties maintaining databases on these subjects.

## **10. Rights of the data subject**

You have the right to obtain our confirmation as to whether your personal data is being processed or not. If we process your personal data, you have the right to receive a copy of such data. We are entitled to charge a reasonable administrative fee for additional copies requested by you.

If you make a request electronically, and have not requested any other delivery format, the data will be delivered in the electronic form that is generally in use, providing that the data can be delivered in a secure manner. We will deliver a copy of the personal data to be processed in electronic form by e-mail.

In certain situations, you also have the right to request restrictions on the processing of your personal data, or otherwise to object to the processing of this data. Additionally, you may request the transfer, in machine-readable form, of data that you have submitted yourself, based on the General Data Protection Regulation.

Please submit requests related to the exercise of rights by email to [asiakastietokysely@s-pankki.fi](mailto:asiakastietokysely@s-pankki.fi). In addition to the name, a request related to the exercise of rights must provide other information identifying the lease agreement, such as the name of the agreement, the date of signature and the signatories, based on which information about the data subject can be retrieved from the register.

If you consider the processing of your personal data to be unlawful, you may lodge a complaint with the competent supervisory authority.

## **11. Right to withdraw consent**

To the extent that we process your personal data based on consent, you have the right to withdraw your consent at any time. The withdrawal of consent terminates the data controller's right to process personal data for purposes based only on consent. The withdrawal of consent does not affect the legitimacy of any other processing than that taking place based on consent or processing that was carried out at the data subject's consent before the withdrawal of the consent.

Consent can be withdrawn using a form, through S-Bank's electronic channels or, for event-related communication, via the unsubscribe link in the email.

## **12. Protection of the register**

We protect the data in our register appropriately, using both technical and organisational measures. To protect the register, we use the following measures, among other things:

- Protection of hardware and files
- Access control
- User identification
- Management of access rights
- Logging of usage events
- Guidance for and supervision of processing the personal data

Personal data is only processed by our employees who must do so to carry out their duties. All persons processing personal data are bound by banking secrecy and an obligation of confidentiality.

We also require our subcontractors to appropriately protect and carefully process any personal data they process.



If your personal data end up in the wrong hands despite all our protective measures, we will immediately investigate the matter and seek to prevent any damage caused by the infringement of personal data protection. We will inform the required authorities and the data subjects of the infringement of data protection in compliance with legal requirements.