

Register of related parties

1. Data controller Pohjois-Suomen opiskelija-asuntosäätiö sr (business ID: 0210156-9) Mannenkatu 6 A 90130 Oulu Tel. +358 8 3173 110

2. Person in charge of register matters Enni Holopainen Mannenkatu 6 A 90130 Oulu Tel. +358 8 3173 144 <u>enni.holopainen@psoas.fi</u>

3. Register name

Register of related parties

4. Purpose of use of personal data

A register on PSOAS's related persons and entities. The purpose of use of the register is to monitor the information required by the Foundations Act and for reporting in the annual report.

5. Legal basis of processing personal data

Foundations Act

6. Data content of the register

The foundation's related persons:

- Name, address and relationship with the foundation;
- Entities over which the person exercises or has exercised dominant influence, and the business IDs of such entities;
- Entities in which the person has or has had a position of trust, the business IDs of such entities, and a description of the position of trust;
- Names of family members and entities in which the family members exercise or have exercised dominant influence/have or have had positions of trust, the business IDs of such entities, and a description of the position(s) of trust.

A "family member" is the married and common-law spouse, own/spouse's child and the child's spouse and descendant, and own/spouse's parent, grandparent and the grandparent's parent.

Information on any financial transactions between the aforementioned persons and PSOAS.



7. Regular data sources and processing of personal data

Data are collected annually by a form which PSOAS sends to its related persons. The data collected on the form are included in a register, the sole purpose of which is to monitor related party transactions. Additionally, data are collected from public databases and from other PSOAS's own registers, such as its employee, customer and stakeholder registers.

Names and contact details of related persons as well as names and contact details of related entities (in which the related persons exercise or have exercised dominant influence) are used to retrieve and aggregate the total amounts of financial transactions (e.g., lease agreements) for annual monitoring of related party transactions. Data on wages and salaries are aggregated from the payroll application. The data are compiled into a table presenting the total amounts of transactions for each category of related parties. Different types of transactions include, for example, wages and salaries, agreements, and aid granted. Loans, liabilities and collateral commitments must also be notified. Tables and their clarifications are published in the annual report.

8. Regular release of data

Data recorded in the register of related parties are used to compile the foundation's annual report in order to comply with the reporting obligation under the Foundations Act. In accordance with chapter 5, section 2 of the Foundations Act, the foundation's annual report provides information on

- grants,
- fully or partially gratuitous financial interests,
- monetary loans,
- liabilities and collateral commitments,
- other financial transactions concluded with related parties.

The annual report states the nature of the related party relationship, description of the financial transaction, and the monetary value of the financial transaction or interest. Summary of related party transactions is presented as a table.

9. Transfer of data outside EU or ETA countries

Data are not transferred outside the member states of the European Union or outside the European Economic Area.

10. Register protection principles and storage of data

Paper documents are stored in locked premises accessible only by designated persons who have signed a confidentiality agreement.

Electronically processed 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.



Only certain identified employees of the data controller and companies commissioned by and working on behalf of the data controller, who have signed a confidentiality agreement, have access to the data in the register with an individual licence granted by the data controller.

Data will be stored for 10 years after the end of the corresponding financial period.

11. Rights of the data subject

As per the Personal Data Act, a data subject has the right to inspect what data regarding them have been saved in the register. The inspection request must be delivered to the person in charge of register matters as a written and signed document. The inspection request can also be made in person by visiting the data controller.

A data subject has the right to request the rectification of inaccurate data by contacting the data controller.

A data subject also has the right to request the restriction of processing their data. PSOAS may decline to fulfil the request based on the grounds defined by the law.

A data subject has the right to file a complaint to the supervisory authority if they believe that their personal data are being processed in violation of the EU General Data Protection Regulation or national legislation and regulations on data protection.