

# Customer register

#### 1. Data controller

Northern Finland Student Housing (business ID: 0210156-9) Mannenkatu 6 A 90130 Oulu Tel. +358 (0)8 3173 110

#### 2. Data processor

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#### 3. Name of the register

Register based on PSOAS customership or other appropriate affiliation

### 4. Purpose of use of personal data

Personal data is processed for the purpose of managing, maintaining, analysing and development of relationships based on customership and other appropriate affiliations, such as:

- managing customer information
- managing rent ledgers
- customer surveys such as customer satisfaction surveys
- maintenance of apartments and sharing thereby necessary information with maintenance contractors of the data controller
- collecting rent receivables and other tenancy receivables
- terminating lease agreements
- In addition to communicating with customers, personal data can be used for planning and development of the data controller's business operations.

## 5. Data content of the register

The register may be used to process the following personal data and their changes on housing applicants, refereed customers, tenants and possible co-tenants:

## Basic information such as

- name
- national identity number
- contact information (mailing addresses, phone numbers, e-mail addresses)
- gender



Information on customership and other appropriate affiliation such as

- customer number
- starting date of customership
- number of persons sharing the same apartment
- first name, surname and national identity number of spouse or common-law spouse sharing the same apartment
- first names, surnames and national identity numbers of all persons sharing the same apartment
- with the data subject's consent, first names and surnames and national identity numbers of persons sharing the same apartment
- information on the consent by the co-applicant to the data subject to share their information with the data controller
- information on possible legal guardian
- information on employment and duration and type of employment
- information on income and property
- credit information
- debt arrangement information
- debt collection information
- information on previous apartment
- information on needs for housing
- information on use of housing services (e.g. parking spaces)
- information related to tenancy, i.e. lease information, rent payment information, deposit information and terminations of tenancy
- for underage tenants, identification data of the guardian who signed the lease agreement
- reclamations, feedback and other communications and actions related to customership and appropriate affiliations, incl. recorded phone conversations
- marketing actions to the data subject, use thereof and information shared thereby
- bank account information related to termination of tenancy
- consents and restrictions to direct marketing

## 6. Regular data sources

Data is collected from the data subject in e.g. rental housing applications, e-services.

Personal data may also be collected and updated from the data controller's other personal registers, customers giving their termination notice, data controller's business partners and authorities and companies that provide personal data services such as the Population Register Centre and the credit information register of Suomen Asiakastieto Oy for credit information.

#### 7. Release and transfer of data



As a rule, no data is released outside PSOAS. Data can be released, within the boundaries and obligations of current legislation, to e.g. debt collection contractors working on behalf of PSOAS and other parties entitled by law to data access. In addition, data can be released to the facility management, maintenance, security and locksmith companies as well as electricity and internet providers to supply housing-related services.

If the ownership of the apartment is transferred to a party outside PSOAS, PSOAS may provide the new owner with information necessary for managing the tenancy.

No data is transferred outside the area of European Union member states or outside the European Economic Area.

### 8. Data protection

Any electronically processed data in the register are protected with firewalls, passwords and other necessary technical means generally accepted within the data security field at the time.

Any manually maintained data are located in spaces with restricted access from outsiders.

Any data in the register is only accessible by designated employees of the data controller and companies working for and on behalf of the data controller, who have signed a confidentiality agreement, with an individual access right granted by the data controller.

### 9. Right to access, restriction and rectification

The data subject has the right, in accordance with the Personal Data Act, to inspect which data concerning them has been recorded in the register. The data access request should be sent to the data processor and it must be written and signed. The data access request can also be made in person in the presence of the data controller.

The data subject has the right to deny the processing and release of any data concerning them for direct mail, distant selling or other direct marketing as well as for market and opinion surveys by contacting the data controller.

The data subject has the right to demand the rectification of incorrect data by contacting the data controller.