

## **PRIVACY POLICY OF SAVLAP OY**

A combined privacy policy and information document in accordance with the Data Protection Act and the General Data Protection Regulation of the European Union (2016/679/EU).

### **CONTROLLER**

Business Name: Savlap Oy  
Address: Keskuskuja 5 B 1B, 99130 SIRKKA  
Business ID: 3211404-5

### **CONTACT PERSON FOR DATA PROTECTION MATTERS**

Name and position: Kimmo Turtiainen, CEO  
Phone: 040 709 7000  
Email: levillas@levillas.fi  
Postal Address: As mentioned above

### **NAME OF THE REGISTER**

Savlap Oy customer register

## **FOUNDATIONS AND PURPOSES OF PROCESSING PERSONAL DATA / WHY WE COLLECT YOUR INFORMATION**

### **General Information About Processing Personal Data:**

To the extent that the customer register contains personal data, the processing of such data complies with data protection laws and other applicable laws, regulations, directives, and official guidelines governing the processing of personal data. Personal data refers to information that can be linked to a specific individual. This document provides a more detailed description of the procedures for collecting, processing, and disclosing personal data, as well as the rights of the data subject.

### **Purpose of Collecting Personal Data**

Contractual, customer, or other comparable relationship. The purpose of using the customer register is for the controller to

- establish contractual or customer relationships with the principal (e.g. seller or lessor);

- manage relationships related to the execution of assignments with the counterparty of the principal (e.g. buyer or tenant);
- maintain contractual relationships with users of appraisal assignments or other expert services.

In addition, the controller may also collect information from present individuals for the prevention, monitoring, and investigation of crimes or misconduct, or for various means of identifying the interests of potential customers, establishing future customer relationships, providing services, and conducting marketing.

In this section:

a) In this document, the individuals mentioned are referred to as Customer.

b) Legislation concerning real estate agencies, including the Real Estate Agencies and Rental Apartment Agencies Act (1075/2000), and the Act on the Brokerage of Real Estates and Rental Apartments (1074/2000), and the handling of assignments based on them, as well as the customers' own searches.

c) Investigation requires the information listed in the "Customer Register Data Content" section.

d) Storage, use, and retention.

e) Statutory supervision of money laundering

In accordance with Chapter 3, Section 3 of the Act on the Prevention of Money Laundering and the Financing of Terrorism (444/2017, hereinafter "Anti-Money Laundering Act"), customer identification data and other personal data required by law are stored, retained, and may be used for the prevention, detection, and investigation of money laundering and the financing of terrorism, as well as for the investigation of the criminal offense through which the assets subject to money laundering or the proceeds of crime related to money laundering or the financing of terrorism have been obtained. Customer identification data or other personal data obtained solely for the purpose of preventing and detecting money laundering and the financing of terrorism are not used for a purpose inconsistent with these objectives.

f) Consent-based data storage

If the right to register based on the laws or circumstances mentioned above is exceeded, or if no other legal basis is mentioned, the Customer is separately requested to provide consent for the storage, processing, and retention of personal data. Assignment data are also used in contractual relationships related to evaluations and other expert services and are retained in a similar manner.

## **Purpose of Data Usage**

The information contained in the Customer Register may be used for the following primary purposes:

- Managing and developing customer relationships
- Producing, providing, developing, enhancing, and safeguarding services
- Invoicing, collection, and verification of customer transactions
- Targeted advertising
- Analyzing and compiling statistics related to services
- Customer communications, marketing, and advertising
- Safeguarding and securing the rights and/or properties of the register holder and other individuals and entities
- Fulfilling the legal obligations of the controller, and other similar purposes.

## **Consequences of Not Providing Information**

If the controller does not obtain the information referred to in points a), b), and c), it will not be possible to initiate or continue a customer relationship, enter into any other agreement, or engage in a legal transaction with the Customer. If sufficient information for visitor identification is not obtained, access to the premises may not necessarily be granted to the respective individual.

## **Customer Register Data Content / What Information We Collect?**

The Customer Register and its appendices contain or may contain information related to the following categories:

- Customer's basic information, such as full name, address, language
- Personal identification number and the company registration number, if necessary for reliable identification, of the individual acting on their own behalf or on behalf of the company
- Information related to billing and collection
- Information related to customer relationships and contractual relationships, such as services offered to the Customer, the date of service usage, purchase offers, their acceptance, the date of rental or sales agreements, property details, brokerage fees, seller information, and similar data
- Permissions and prohibitions, such as direct marketing permissions and prohibitions
- Interests and other information voluntarily provided by the Customer

- Other transaction-related services data
- Complaints and information about their processing
- Tenant's credit information and other financial information for assessing rent payment capability

For customer due diligence under the Anti-Money Laundering Act, the following Customer-related information is processed or may be processed:

- Name, date of birth, and personal identification number
- Representative's name, date of birth, and personal identification number
- The full name of the legal entity, registration number, registration date, and registration authority
- The full names, dates of birth, and nationalities of members of the legal entity's board or equivalent decision-making body
- The legal entity's field of operation
- The names, dates of birth, and personal identification numbers of beneficial owners
- The name, document number, or other identifying information used for verifying the Customer's identity, or, if the Customer has been remotely identified, information about the method or sources used for identification
- Information about the Customer's business activity, the nature and scope of the business, the financial situation, the reasons for using the service, and information about the origin of assets, as well as other necessary information obtained for customer due diligence as referred to in Section 4(1) of the Anti-Money Laundering Act
- Information related to determining the origin of assets as referred to in Section 4(3) of the Anti-Money Laundering Act, and essential information obtained to fulfill customer due diligence obligation concerning politically influential persons as referred to in Section 13 of the Anti-Money Laundering Act
- For foreign customers without a Finnish personal identification number, information about the customer's citizenship and passport/travel document details

## **DATA RETENTION PERIOD**

The information in the transaction journal is retained for ten (10) years from the completion of the transaction. Information in accordance with the Anti-Money Laundering Act is retained for five (5) years, unless the continued retention of said information is necessary for an ongoing criminal investigation, legal proceedings, or to safeguard the rights of the controller or its personnel. The necessity of retaining data and documents is reevaluated no later than three (3) years from the last review of the need for retention (Anti-Money Laundering and Anti-Terrorist Financing Act, 444/2017, Section 4).

Other personal information is deleted once it is no longer needed. If the collection and retention of personal data was based solely on the Customer's consent, the data will be deleted upon their request.

## **REGULAR DATA SOURCES / WHERE IS DATA COLLECTED FROM?**

Personal data is collected directly from the Customer during the contractual agreement, purchase, or lease offers, and other events related to the commission, fulfilling the customer due diligence obligations, and creating documents. Personal data may also be collected and updated from sources such as property management agencies, population registers, other government registers, and credit information registers. Data is collected directly from the Customer or with their consent from registers or sources maintained by authorities or third parties.

## **DATA DISCLOSURE / WHERE CAN DATA BE SHARED?**

The controller may disclose personal information within the limits and obligations set by applicable laws, as well as for the purpose of implementing agreements between parties or in cases of legitimate connections.

As a general rule, information is not transferred outside the European Union or the European Economic Area. However, information can be transferred or disclosed outside the European Union or the European Economic Area in a manner permitted by law, provided that the data is transferred to a country where the European Commission has determined an adequate level of data protection or through contractual arrangements that ensure an adequate level of data protection. Temporary transfers outside the EU can also occur in connection with the use of various cloud services, such as OneDrive, iCloud, or Dropbox.

Data is disclosed to authorities in cases required by law.

In the context of outsourcing data management, the processing of personal data may also be carried out by subcontractors acting on behalf of the controller, but only in the name of the controller. Such subcontractors may include providers of intermediary systems, marketing systems, and entities maintaining sales advertisement portals.

## **PRINCIPLES OF DATA PROTECTION / HOW WE PROTECT YOUR PERSONAL DATA**

Access to the registry requires a username granted by the main user of the register. The main user also determines the level of access rights granted to other users. Only employees of the controller and employees of subcontractors have access to the information when it is necessary for performing work-related tasks. The data is stored in

service databases protected by firewalls, passwords, and other technical means. The databases are located in locked and guarded premises, and only specific predefined individuals have access to the information.

When personal data is processed by subcontractors on behalf of the controller, agreements between the controller and the subcontractor ensure the implementation of appropriate protective measures, ensuring that the processing of personal data complies with the requirements of data protection legislation.

## **CUSTOMER RIGHTS / HOW CAN I ENSURE THE LEGALITY OF PROCESSING?**

### **Inspection, Access, and Data Portability**

Customer has the right to inspect the information stored about them in the Customer Register. Customer must submit their inspection request to the controller in writing with a signature, or in a similarly authenticated document, or via email.

Contrary to the above, the Customer does not have the right to inspect information collected for the fulfillment of reporting or customer due diligence obligations as mandated by anti-money laundering legislation (Anti-Money Laundering Act, Section 4:3).

However, upon Customer's request, the Data Protection Ombudsman may verify the legality of processing this information.

The controller will provide the aforementioned information to Customer within 30 days of the inspection request.

Customer has the right to receive their self-supplied customer information in a structured, commonly used machine-readable format and transfer it to a third party. The controller, however, retains the transferred data in accordance with this policy.

### **Correcting Inaccurate Information**

Customer has the right to correct any personal data stored in the personal register concerning them if it is inaccurate.

### **Opposing or Restricting Data Processing and Deleting Information**

Customer has the right to oppose the processing of data concerning themselves, specifically for direct marketing, distance selling, and other forms of direct advertising, as well as for market and opinion research, and business development by the controller. Additionally, Customer can restrict the processing of data concerning themselves and have personal data that has been previously registered for the aforementioned

purposes deleted, even if there were other grounds for data processing.

### **Withdrawing Consent**

If the information in the register is based on the Customer's consent, this consent can be withdrawn at any time by notifying the controller's representative mentioned in this policy. Upon request, all data that does not need to be retained or cannot be retained under the provisions of the law or other grounds mentioned in this policy will be deleted.

### **Procedure for Exercising Rights**

Requests for inspection, correction, or other inquiries can be made by contacting the controller's customer service using the contact information mentioned in this policy.

### **Disputes**

The customer has the right to bring the matter before the Data Protection Ombudsman if the controller does not comply with the customer's request for correction or other inquiries.

### **PROFILING AND AUTOMATED DECISION-MAKING**

The controller does not carry out profiling of the Customer based on personal data or use automated decision-making.

### **Savlap Oy**

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