

PROCESSING OF PERSONAL DATA IN CONNECTION WITH RESIDENTIAL LETTING

YOUR PERSONAL DATA – OUR RESPONSIBILITY

This information describes how Wallenstam processes your personal data and how we ensure that processing of your personal data is performed in a responsible way and in accordance with the data protection legislation in force. Your privacy is important to us and we therefore want you to read on in order to learn more.

This information concerns you who resides in one of our residential properties either as the holder of the contact or a cohabitant.

The GDPR (General Data Protection Regulation) is a new EU regulation that will start to apply throughout the entire EU on May 25, 2018. The GDPR replaces the Swedish Personal Data Act. A lot is the same, but the requirements around how we may process your personal data as your landlord have been tightened.

In connection with GDPR, we believe it is important that you know what rights you have as our tenant and how we are processing your personal data. You can read more about your rights and the personal data processing in this information text or on our website, www.wallenstam.se.

Controller

Wallenstam AB (publ), corporate id. number 556072-1523, together with Group companies is the controller for the processing of your personal data and is responsible for ensuring that such processing occurs in a legal way. This means, inter alia, that Wallenstam protects your personal data through necessary measures and that you always have the right to contact us in order to find out what personal data we have saved about you.

Contact us

If you have any questions you are welcome to get in touch with us at Data Protection Officer, Wallenstam AB, 401 84 Gothenburg, Sweden or send an e-mail to dataskydd@wallenstam.se.

If you believe that our processing of your personal data occurs in contravention with applicable data protection legislation, you also have the right to lodge a complaint with the Swedish Data Protection Authority.

What data are collected and processed?

Wallenstam handles personal data through our tenancy relationship or for example when you contact us via e-mail or when you log into and use our My pages service. We also process personal data you provide to us when you report a fault or participate in tenant meetings and events arranged by us.

Apart from the personal data you provide to us, we may collect personal data about you from other parties. Personal data may be obtained from references and former landlords, municipalities and public authorities, credit information companies and in certain cases from other landlords if Wallenstam buys a property where you have been a tenant.

We may also need to obtain your personal data through public registers in order to ensure that they are correct. If you live in a student apartment, e.g. we will check that you are studying. If you have protected personal data, we will handle your data according to our internal routines for processing of such personal data.

Specific examples of personal data that we may process are the following:

- Name, contact information (telephone number, e-mail address and address),
- personal identity number, coordination number or equivalent identification code,
- identification number such as contract number, internal or official apartment number,
- existence of security, e.g. guarantor,
- contact information to persons you notified to us (e.g. close relative, custodian, or guardian),
- payment defaults and payment data,
- data relating to consumption of heating, hot water and electricity,
- direct debit and payment references (for example OCR payment number),
- data we receive in connection with reports of disturbances or problems,
- information needed to check unlawful subletting and assignments,
- images within the scope of camera surveillance,
- booking and entry logs in common areas, linked to your electronic key,
- health data in connection with evacuation, home adaptations and inspection of apartments that require information about health data, e.g. compulsory ventilation checks,
- data about employment and financial position in connection with requests for change of apartment and
- language preferences that do not include data regarding ethnicity.

And additionally for student apartments the following personal data may be processed:

- Scope of studies and study results in order to perform authorization checks and
- membership in students' union, students' club or student organization.

Consent

If processing of your personal data should require your consent, we will obtain it separately.

Why is Wallenstam processing your personal data?

As a tenant, your personal data may be processed so that we can perform our obligations as a landlord and contracting party. During the tenancy, we process your personal data e.g. in order to be able to fulfil your tenant agreement, facilitate our tenancy, make necessary adaptations to apartments, send out rental advices and administer your rental payment and to possibly obtain data about consumption of electricity and/or water/heating. We also process your personal data in order to communicate with you on various types of matters, such as contacts in connection with ongoing maintenance and management of the property or when we perform emergency service.

When we provide information about Wallenstam and our services, e.g. by sending out newsletters and marketing and in order to conduct customer satisfaction surveys, we do so

based on a balancing of interests. This processing is necessary for our legitimate interest to develop, improve and sell products and services and maintain good customer contact with you. Your personal data are also processed so that other companies can market their products that you may find useful in connection with the tenancy. Such marketing may relate to broadband companies, insurance companies and electricity companies.

Your personal data are also processed in order to be able to offer you good service e.g. through the use of My pages. Finally, Wallenstam may need to process your personal data in order to meet requirements according to laws, regulations or orders or to attend to a legal claim, e.g. in connection with late or defaults in rental payments, in the case of damage in the apartment or if disturbances occur in the housing so that we can ensure security for our tenants.

How long are your data saved for?

We process information about you as a tenant in order to provide the best service and we save your data for as long as the data are necessary in order to fulfil the purposes for which the data were initially collected. The data may also be saved for the time required according to applicable legislation. We have day-to-day routines, which ensure that we do not store unnecessary data about you and we minimize the storage time as far as possible.

A guarantee commitment, decision about a guardian or custodian is deleted by us two years after the guarantee or the decision has ceased to apply.

Data that are registered in connection with disturbance and problem reports are never saved for longer than two years and are thus deleted on an ongoing basis during the tenancy.

If the tenancy ceases on account of neglect in the housing, we will save the following data for two years after the tenancy has ceased: name, personal identity number, identification number, removal date and a short note regarding the removal reason.

How we process your personal data?

We are restrictive in disclosing your personal data but sometimes it is necessary for the tenancy.

Your personal data are used by Wallenstam and Wallenstam's processors. We only disclose personal data to other parties in the case that it is necessary in order to fulfil our obligations as a landlord. This means that personal data may need to be disclosed to insurance companies, housing agencies, emergency service providers and contractors and partners that perform repairs, maintenance and service in your property as well as collection and credit information companies.

Data may be disclosed to public authorities in the case this is required by law or order.

In connection with a possible sale of the property, the data may be provided to the buyer of the property.

As a rule, we do not transfer any personal data to countries outside the EU/EEA and in cases such transfers occur, they occur according to particularly high standards and agreements.

Your rights

You are entitled at any time to withdraw your consent to certain personal data processing. If you withdraw your consent, we will delete the personal data that were processed solely based on the consent.

We always want to be transparent with how we process your personal data. If you want to obtain an insight into what personal data we are processing about you, you have the right (free of charge once a year) to obtain information and a copy of what personal data we have about you and how we are processing these data. Your request must be in writing and signed in your own handwriting and contain information relating to name and personal identity number. We need this to ensure that we are disclosing the data to the right person.

You have the right to have incorrect data rectified and supplemented. You also have the right in certain cases to have your personal data deleted, for example if they are no longer necessary for the purpose for which they were collected. You have the possibility to log into My Pages and rectify incorrect data. You can request deletion of your data to the extent this conforms with applicable legislation.

You have the right to object to processing of your data for, inter alia, direct marketing and in those cases where we process the data based on a balancing of interests.

You are also entitled to have the data transferred to another controller when this is technically possible.