

# PRIVACY NOTICE – Tenants

*Previous update: June 2023*

We at CapMan respect the privacy of all our stakeholders. Our privacy notices describe how we process personal data in accordance with the EU's General Data Protection Regulation ("**GDPR**").

This Privacy Notice applies to personal data of the tenants of the properties owned by CapMan funds as well as their representatives, other contact persons and ultimate beneficial owners ("**you**").



## 1. Data controllers

The controller of your personal data is the fund managed by CapMan group company which owns and rents the property and/or the management company, general partner, other CapMan group company or another entity in the fund structure, which is involved in the processing of your personal data in connection with the rental administration, property management or fund management. Each CapMan group company and CapMan fund is responsible for the processing of personal data in its own activities for the purposes and on legal bases set out in this Privacy Notice and may use the necessary personal data collected by other group companies for the same purposes.

Typically, certain tasks related to rental management and property management are outsourced to third party service providers. As a current or prospective tenant (or the tenant's representative or contact person), you are likely to engage directly with the rental management service provider in relation to your tenancy or prospective tenancy. However, CapMan funds and CapMan group companies will also process your data as data controller.

## 2. Contact

If you have questions regarding this Privacy Notice or wish to exercise your rights, you may contact:

CapMan Plc  
Privacy Matters  
Ludviginkatu 6, 00130 Helsinki  
Email [privacy@capman.com](mailto:privacy@capman.com)

## 3. What personal data do we collect and process?

We generally collect and process the following types of personal data:

- Identification and contact details such as name, personal identification number, phone number, postal and email addresses, professional address
- Data required to verify your identity such as passport information and passport copy or a copy of another identification document
- Information on the company you represent and your professional role
- Data related to your tenancy application such as your occupation, length of your employment, salary/income details, credit checks, names and contact details of other persons moving into the apartment
- Data related to rental agreement such as tenant details, key holder names and pets to be held in the apartment
- Data related to payments and rental guarantees such as payor, bank account details, payment history and payment defaults
- Ultimate beneficial owner status, applicable sanctions and sanction screening results
- Other information necessary for managing the tenancy such as warnings and incident reports

## 4. Why do we collect and process personal data?

We process your personal data for the purposes of managing the tenancy of properties, property management, communicating with tenants, conducting tenant surveys, performing credit checks, fulfilling our contractual obligations, ensuring the security of properties, fulfilling our legal obligations (e.g. international sanctions regulations) and performing our customary administrative and organizational functions as a fund manager and property owner.

## 5. What is the legal basis for processing?

Under data protection laws, we need to have lawful grounds for processing your personal data. Sometimes more than one lawful ground applies. The legal basis for processing your personal data for the abovementioned purposes is primarily our contractual obligations relating to rental agreements and our obligation to comply with applicable laws and regulations. In addition, data processing may also be based on our legitimate interest to conduct our administrative processes and our other business appropriately and effectively. We may also base our data processing on your express consent.

## 6. What are our information sources?

We collect personal data from various sources but mainly from you or the organization you represent. We may also get information from our property managers. Additional information sources include public registers such as trade register and corresponding foreign registers.

Information sources are used within the limits of the applicable laws, and your consent is requested when necessary.

## 7. How and with whom do we share personal data?

We share your personal data with our property managers and between different entities within the Group for the abovementioned purposes. Further, we use services of various service providers and may transfer personal data to such third-party service providers. Such services include e.g. receivables collection, IT services related to software systems and certain consultants and advisors. If required by law or regulation, we may disclose personal data to authorities. We may also share personal data if we are going to sell the property to a new owner.

Sometimes we may need to transfer personal data outside EU or EEA for instance because a service provider is in a third country. Such transfer would only be made (i) to a country in which the level of data protection is adequate for safeguarding the transferred personal data according to the EU Commission; (ii) using appropriate safeguards such as the EU Commission's standard contractual clauses in accordance with applicable data privacy laws and regulations; or (iii) if the transfer is specifically agreed upon with you

## 8. How long is the personal data retained?

We store your personal data only for as long as it is necessary for the purposes the data was collected for. When personal data is no longer

needed, it will be deleted or anonymized, unless we have a legal obligation to retain data for a longer period or unless retention is necessary for the purposes of securing our rights and fulfilling our obligations and for handling possible claims. This means that the retention periods vary depending on the processing purpose, type of personal data, and local requirements.

## 9. How do we ensure that your personal data is safe with us?

We implement technical and organizational security measures to protect personal data from loss, misuse, unauthorized access, disclosure, alteration or destruction. Only specific personnel of CapMan and of our third-party service providers are given access to personal data, and these employees and third-party service providers are required to treat this information strictly confidential.

## 10. What are your rights?

You are entitled to obtain information of your personal data that we process and have access to or obtain a copy of such personal data. You are also entitled to request us to correct, update or remove your personal data. To the extent required by applicable data protection law, you have a right to prohibit or restrict data processing and request data portability, i.e. transfer of your personal data in a structured, commonly used machine-readable format to you or to another data controller.

You should be aware that certain information is strictly necessary for the performance of a contract or for compliance with our legal obligations, which may set limits to some of the rights listed above. In case the data processing is based on your consent, you may at any time contact us and revoke your consent. Withdrawal of consent does not affect the lawfulness of data processing before the withdrawal.

If you find your legal rights violated, you have the right to file a complaint with a competent authority. According to the GDPR you may lodge complaint in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

Please send any requests regarding your rights to [privacy@capman.com](mailto:privacy@capman.com). We will answer to your request within one month of receipt of your request unless there are justified reasons to extend this time by two further months. If we cannot fulfil your request, e.g. due to our obligations, we will inform you in writing within the same time frame and explain to you the reasons why we are unable to fulfil your request. You can lodge a complaint with the supervisory authority if you disagree with our decision.

## 11. Updates to Privacy Notice

We may amend this Privacy Notice from time to time.

