

Filing of customer data in the SATO Group

Data file description	Section 10 of the Finnish Personal Data Act (523/99) Date of preparation: 15.9.2010
1. File controller	SATO Corporation Panuntie 4 00601 Helsinki Phone 0201 34 4000
2. Person responsible for the file matters	Monica Aro Panuntie 4 00610 Helsinki
3. Name of data file	Property, customer and rent ledger system 'Tampuuri'
4. Purpose of data file	Customer relationships and property rental activity
5. Purpose of processing of personal data / purpose of data file usage	Property maintenance and management of lease agreements: Customers' personal data is required in defect report, repair, inspection and change situations related to apartments and in the management of lease agreements. Apartment marketing and customer relationship management: Customers' personal data is required in the maintenance of basic data related to marketing and regular customer programmes. Rent ledger management: Customers' personal data is required in rent-related invoicing and payment collection.
6. File data content	The following data can be filed in the property, customer and rent ledger data file Tampuuri regarding rental apartment applicants, lessees, co-lessees, co-payers, other persons to reside in the apartment and prospective apartment purchasers: Lessee's name, personal identity code or, in the absence of a personal identity code, a travel document identifier such as passport number, address, phone number, email address, regular customer number, start date of regular customer relationship, guardianship details if applicable, employment status, employment duration and type, income and asset data, credit data, data concerning current home, marital status, lease agreement data, rent payment data, security deposit data, contact details and participation in activity organised by the lessor. Possible co-lessee's name, personal identity code or, in the absence of a personal identity, code a travel document identifier such as passport number, address, phone number, email address, regular customer number, start date of regular customer relationship, guardianship details if applicable, employment status, employment duration and type, income and asset data, credit data, data concerning current home, marital status, lease agreement data, rent payment data, security deposit data, contact details and participation in activity organised by the lessor. Names and dates of birth of any other persons who will reside in the apartment. The name, address, phone number and email address, contact details and participation in activity organised by SATO can be filed regarding persons who have expressed their interest in properties under construction and/or available for purchase.
7. Regular sources of data	Rented apartment application forms and lease agreements. Data is updated on the basis of sources such as notifications and events during tenancy. Data is also obtained on the basis of purchase notifications and contact requests related to property trade. Personal data is also collected and updated on the basis of the Finnish Population Register. Credit data is collected and updated on the basis of the credit data file of Suomen asiakastieto Oy.

8. Regular disclosures of data or transfer of data to destinations outside the EU or the European Economic Area
- Data specified in this file description is not disclosed to destinations outside the SATO Group, excluding contractual partners performing a part of the rental business or payment collection on behalf of the SATO Group and parties with a statutory right to access the data.
9. Principles of data file protection
- A. Manual data / storage location and protection:
Data is stored in locked and supervised premises.
- B. Data filed in Tampuuri / principles of file access and access control and physical protection of hardware:
Data is only accessible by designated persons appointed by the SATA Group. Access to the data file requires a user ID and password issued by the customer database administrator. Task-specific access rights for users are also issued by the administrator. Data is stored in premises protected by centralised locking and supervision, and terminal connections take place in SATO Corporation's closed and secure network.
10. Right of access
- Customers have the right to review their personal data stored in the file. Customers may request the right to review their data from the controller in person or in writing.
- Please send written requests to SATO Corporation Customer Service, PO Box 401 00601 Helsinki.
- Access to the file in order to review personal data is, as a rule, granted within one week of the request.
11. Rectification
- Customers may request the rectification of erroneous data, in which case the decision regarding data rectification is made by the controller. Erroneous data detected in an application can be rectified by the controller once provided with the correct data by the applicant.
12. Provision of information to the data subject
- Applicants are informed in rented apartment application forms about the fact that data concerning them will be filed in the property, customer and rent ledger system Tampuuri. In addition, it is specified in rented apartment application forms that the data file description is available for inspection at SATO's service points and on the SATO website at www.sato.fi.