

## PRIVACY STATEMENT ON THE CUSTOMER AND MARKETING REGISTER

### 1. Controller

Lehto Asunnot Oy (0189229-0)  
Voimatie 6 B, 90440 KEMPELE,  
Finland  
(hereinafter referred to as the  
"Controller")

### 2. Contact person in matters concerning the register

Niko Huttu  
Väritehtaankatu 8, 01300 VANTAA,  
Finland  
tel. +358 20 320 000 tietosuoja@lehto.fi

### 3. Data included on the register

Our customer and marketing register may contain the following data about data subjects: name, address, email address, phone number, personal ID code, property unit ID, basic details and premises information about homes purchased by customers, information related to the warranty and annual inspection processes and other repair information, customers' subjects of interest and characteristics related to housing, invoicing and payment data, data about marketing consent or restriction, data created in conjunction with opinion surveys, data on free-form discussions created in conjunction with the use of the chat service, and information available in conjunction with the use of communications and other services. The register may also contain information concerning real estate that people have offered for sale, as well as the data subjects' ideas on urban planning.

#### Cookies

Our registers contain information that is considered personal data and that is collected with the help of cookies. A "cookie" is small, widely used text file that the internet browser saves on your computer or other device when you visit a website. The browser sends information about your visit back to the website when you visit it again. All modern websites use cookies to offer you a more personalised browsing experience. Each cookie is set separately for each of your devices, and cookies can only be read by the server that sets them. Since cookies are tied to a browser, and they cannot in principle be shared between different browsers or devices (unless a browser, add-on or other application specifically enables this), the choices you make in terms of managing cookies only apply in principle to the individual browser in question. Cookies cannot run software, nor can they be used to deliver viruses or other harmful code, nor can they damage your device or your files. In principle, individual users cannot be identified purely by using cookies or equivalent technologies.

### 4. Purpose and legal basis for processing personal data

Customer data is processed for the purposes of managing, maintaining, developing, analysing and compiling statistics on the Controller's customer relationships, implementing targeted marketing communications and opinion surveys, sending stock exchange and press releases, handling warranty and annual inspections and managing repair information, and receiving ideas related to real estate acquisitions and urban planning.

Processing is based on fulfilling the obligations arising from commercial agreements between the Controller and the data subject or on the Controller's justified benefit as a realiser, marketer and seller of housing.

We use cookies to improve and personalise the user experience of the service, collect data on the number of visitors to the service and the most popular content, and identify people who visit the site frequently. When a visitor arrives on our site, data may be collected about matters such as the computer, IP address, browser and server used by the visitor. The use of cookies is based on consent granted by the data subject on the site. Blocking the use of cookies may affect the technical functionality of sites.

## 5. Recipients of personal data

Personal data is processed by people employed by the Controller and authorised specifically for this duty in order to fulfil their own obligations based on their employment relationships. Personal data may also be processed by external service providers, such as the chat service provider or potential subcontractor in conjunction with the realisation of warranty and annual inspections. The Controller has signed agreements on data protection meeting the requirements of the EU General Data Protection Regulation with all of the external processors of personal data, and these agreements ensure the confidentiality of data and other matters.

Personal data may also be processed within the Controller's parent company, Lehto Group Plc, for administrative reasons based on the Controller's justified benefit. Data may also be disclosed to the authorities if necessary on the basis of court judgments or orders or requests by the authorities based on law.

## 6. Data sources

In principle, personal data is collected from data subjects themselves in contexts including ordering brochures, registering as insiders, purchasing and using housing, and on our website and otherwise directly from customers. Data may also be refined with the help of cookies on the basis of the person's own website behaviour.

## 7. Personal data retention period

The retention period for personal data varies depending on the purpose of processing, and the data is only retained for as long as necessary in relation to the purpose for which it was collected. For example, for people registered as insiders, the retention period is two years after the data subject last showed any form of activity towards the Controller's services, and the longest period is 10 + 1 years from the administrative handover of a housing company for people who have purchased homes based on the contractor's liability period under the general conditions for building contracts in accordance with the agreement between the company and the Controller.

## 8. Data subject's right to object to personal data processing

Data subjects are always entitled to object to direct marketing and the related personal data processing. Similarly, if the processing is based on the Controller's justified benefit, data subjects are entitled to object to personal data processing on grounds related to their specific personal circumstances.

## 9. Other rights of data subjects

### a. Right to access personal data and right to correct data

Data subjects are entitled to receive a copy of the personal data about them or otherwise obtain access to their personal data without charge. Data subjects are entitled to demand that the Controller correct inaccurate and incorrect personal data about the data subject without undue delay.

Data subjects on the housing portal also have the option of inspecting and editing data about themselves using the electronic service at [asunnot.lehto.fi](https://asunnot.lehto.fi).

### b. Right to have data erased

Data subjects are entitled to have data about them erased from the register if the data is no longer needed for the original purposes and the data processor no longer has any grounds based on matters such as fulfilling contractual or statutory obligations.

### c. Right to restrict processing

Data subjects are entitled to have data processing restricted only to data retention if the data is not correct; the processing is unlawful and the data subject does not want the data to be erased; the Controller no longer needs the data for processing purposes but the data subject needs it in order to prepare, bring or defend legal action; or the data subject has objected to personal data processing on grounds related to their specific personal circumstances in anticipation of verification of whether the Controller's justified benefit takes precedence over the data subject's grounds.

**d. Right to transfer data**

Data subjects are entitled to have the data that concerns them and that they have delivered to the Controller transferred from one system to another in cases such as when the legal basis for processing was the data subject's consent or agreement and the processing is conducted automatically.

**e. Right to withdraw consent**

When the processing is based on consent, data subjects are entitled to withdraw consent at any time during processing.

**f. Right to make a complaint to the supervisory authority**

Data subjects are entitled to file complaints with the supervisory authority if they consider that regulations concerning data protection have not been complied with when personal data about them was processed. In Finland, the supervisory authority is the Data Protection Ombudsman ([www.tietosuoja.fi](http://www.tietosuoja.fi)). Exercising this right shall not prejudice the data subject's other means of administrative appeal or legal remedy.

**10. Fulfilment of information requests and other requests concerning data subjects' rights**

Data subjects may send requests concerning exercising their rights as stated in Sections 8 and 9 above to [tietosuoja@lehto.fi](mailto:tietosuoja@lehto.fi). The Controller may ask the data subject to specify its request in more detail in writing and it may verify the data subject's identity before handling the request. The Controller may refuse to fulfil a request on the grounds laid down in the General Data Protection Regulation.

**11. Potential risks related to the rights and freedoms of data subjects and applicable information security procedures**

The Controller and the system providers who are related to the customer and marketing register and who process personal data on the Controller's behalf are committed to processing and protecting personal data in accordance with applicable legislation.

The connection between the user's browser and the Controller's server is encrypted. The material for electronic processing is collected into databases, which are protected by firewalls, passwords and other technical measures, and access is restricted to the personnel whose duties require the use of these systems. A user ID and password are required in order to use the systems, and only the personnel authorised for this duty can access the processed personal data. System audits are performed regularly in order to ensure the continuity of information security.

**12. Transfer of data outside the EU or the EEA**

Personal data is not transferred outside the EU or the EEA.

**13. Automatic decision-making**

Personal data is not used for automatic decision-making.