

# general information on the Akelius group's processing of personal data

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## introduction

The Akelius Group takes data protection and your data privacy seriously.

When you interact with the Akelius group as a tenant, future tenant, mobile app user or visitor to our website, we will process some of your personal data.

The purpose of this general information is to describe how and why we process your personal data, and your rights as data subject.

Personal data is any information relating to you or which can identify you.

If you are a tenant, personal data can also relate to information about members of your household.

Processing of personal data is any operations performed in connection with collection, recording, storage, publication and compilation of personal data.

Akelius may provide additional information or collect consent, to allow for processing of your personal data for specified purposes.

Such additional information or consent takes precedence over the general information provided below.

## controller

The Akelius group is based in Europe.

This means we apply European data protection legislation in all aspects of our business.

The EU General Data Protection Regulation, *GDPR*, is key.

Akelius also applies local data protection and data processing regulation in each country in which the Akelius group conducts its operations.

The entity that determines the purpose and means of processing of personal data is the data controller.

This means different Akelius entities may be controllers of your personal data, depending on under which circumstances we process your personal data.

## tenants or prospective tenants

The legal entity with which you have or wish to conclude a lease is responsible for the processing of your personal data. Unless this is also the landlord, the transfer of your personal data to the landlord is justified because the legal entity is a subsidiary of the Akelius Group or the collection is conducted directly at their behest, Art. 6 para. 1 (f) GDPR.

If you are not sure which legal entity within the Akelius Group is your landlord and this is not specified in your rental agreement, or if you do not have your landlord's contact details, contact the Akelius Service Center, see the contact details below.

## tenant portal users and website visitors

If you are a tenant portal user or a website visitor, the legal entity that makes the tenant portal or website available is the data controller responsible for processing your personal data.

The data controller for the mobile app is mentioned in the separate privacy policy, and for the website and tenant portal, it is the legal entity named in the legal notice.

A transfer of your personal data within the Akelius Group is justified to provide the mobile app, the tenant portal or the website, Art. 6 para. 1 (f) GDPR.

# how and which personal data do we process?

## tenants

Akelius processes personal data which you as tenant provide or have provided to your landlord, before and during your tenancy.

Such personal data may be

- name
- date of birth
- social security number or other national identification number
  
- address
- telephone number
- e-mail address

Transaction information, including

- rental payments
- deposits
- method of payment and amount
- credit card information where applicable
- information about a guarantor and trustee if applicable

Also

- information about occupants other than the tenant such as family members' or dependents' names
- category of accommodation
- other information requested on an application form or other documents from the landlord

Personal data may also be obtained or generated from other sources,

in addition to the data you provide directly.

Such sources can be other tenants in their communication with the landlord,

for example in reports of disturbance or nuisance caused by a tenant,

external companies providing security services relating to investigations and reports of disturbances,

data from security equipment such as CCTV and access control systems,

and the landlord's contractors.

## tenant portal users and website visitors

On our website, mobile app or tenant portal, we partly apply some procedures to analyze user behavior.

Using analytics technology, we gain a better understanding of how our offer is used,

such as how much time people spend on which pages, which links they click, and what they do and do not like.

For example, we collect the following personal data to some extent

- devices' IP addresses which are captured and stored only in anonymized form
- device screen size
- device type through unique device identifiers
  
- browser information
- geographic location (country only), and
- preferred language used to display our website

If the cookies are not necessary, such as those to analyze your user behavior,

we will obtain your consent in advance, which you can revoke at any time.

Information on necessary and unnecessary cookies can be found [here](#).

We process personal data that you have provided or made available as a tenant before and during the tenancy in the tenant portal.

This includes access data as well as general contact inquiries, damage reports (description, pictures [please make sure to only disclose as much as is necessary to clarify the facts], additional comments, phone number) and of course the storage of your existing contract data with associated master data and payment information.

## business partners, general information or making contact

When dealing with a business partner, we process personal data that is necessary to enter into, execute or terminate a contract.

When information is conveyed or contact is made with non-business partners,

we process all necessary personal data to enable this information or contact exchange.

# why Akelius processes your personal data and on which legal bases

Akelius processes your personal data for the purposes and on the legal bases stated below.

The summary may be updated, for example if we introduce new processes for personal data. Akelius will inform you of any substantial or significant changes in an appropriate manor.

## tenants

To manage your apartment application and check if you meet our requirements.

To carry out measures that are performed at your request before you conclude a rental agreement with us, Art. 6 para. 1 (b) GDPR, Art. 6 para. 1 (f) GDPR.

<i>purpose</i>	<i>legal basis</i>
To fulfill our end of the tenancy agreement with you and to administer your tenancy agreement, for example to <ul style="list-style-type: none"><li>- establish, enter into and fulfill the tenancy agreement</li><li>- administer rent payments</li><li>- administer housing allowances</li><li>- manage the property</li></ul>	Fulfilling our obligations under the tenancy agreement or take measures on your request prior to entering the tenancy agreement, Art. 6 para. 1 (b) GDPR.
To fulfill our legal obligations, for example by <ul style="list-style-type: none"><li>- communicating with social services</li><li>- providing information on applicable rents</li><li>- fulfilling our accounting obligations</li></ul>	Fulfilling the landlord's legal obligations under for instance social law, tax law or accounting legislation, Art. 6 para. 1 (c) GDPR.

<p>Exercise or defense of legal claims, for example by putting forward evidence such as reports on disturbances or nuisances.</p>	<p>The landlord's legitimate interests, which is the landlord's ability to exercise or defend itself from legal claims, Art. 6 para. 1 (f) GDPR.</p>
<p>For administrations of Akelius' operations, for example to manage properties such as</p> <ul style="list-style-type: none"> <li>- sales of properties</li> <li>- deposits for future rent payments</li> <li>- to ensure security in our IT environment</li> <li>- to produce statistics on our operations</li> <li>- measures taken for the safety and wellbeing of personnel and contractors to the Akelius group</li> </ul>	<p>Legitimate interests of the Akelius Group mean the ability to</p> <ul style="list-style-type: none"> <li>- improve and develop services</li> <li>- provide services to you</li> <li>- ensure a high level of safety</li> <li>- maintain effective business operations</li> <li>- maintain good relations to you, Art. 6 para. 1 (f) GDPR</li> </ul>
<p>To be able to adapt your apartment in connection with your application for adaptation for disabilities.</p>	<p>If you submit an application for adaptation for disabilities to your landlord, your landlord will request specific consent from you, Art. 9 para. 2 (a) GDPR.</p>

## tenant portal users and website visitors

<i>purpose</i>	<i>legal basis</i>
To manage your apartment application and check if you meet our requirements.	To take measures on your request before entering a tenancy agreement with us, Art. 6 para. 1 (b) GDPR, Art. 6 para. 1 (f) GDPR.  If you apply for an apartment and request or demand the disability-friendly conversion of this apartment, we will collect your specific consent, Art. 9 para. 2 (a) GDPR.
Personalization of our offers for rental apartments, for example <ul style="list-style-type: none"> <li>- to provide personalized offers based on information obtained through your device or equipment</li> <li>- to provide personalized content based on your data processed by us</li> <li>- to offer direct marketing, including advertising, offers and referrals that have been customized based on your data processed by us</li> </ul>	Legitimate interests of Akelius in offering and marketing our services to improve our offer, Art. 6 para. 1 (f) GDPR.
Providing the content of the website accessed by you	Legitimate interests in presenting the website content accessed by the user.
Analysis of our users' needs and optimization of the offer on our websites	Legitimate interests in aligning the offer with feedback from our users, Art. 6 para. 1(f) GDPR, in the case of cookies with your consent, which you can revoke at any time.

	You can find more information on cookies <a href="#">here</a> .
Tenant portal	<p>Legitimate interest in providing a digital online portal to execute the tenancy, where tenants and landlords can obtain information faster and solve more practical cases, legal basis is Art. 6 Abs. 1 (f) GDPR.</p> <p>We also use cookies for the tenant portal's usage analysis through your consent, which you can revoke at any time. You can find more information on cookies <a href="#">here</a>.</p>

## business partners, general information or making contact

All relevant personal data needed to execute the contract is processed to initiate, implement or terminate contractual relationships, Art. 6 para. 1 (b) GDPR.

If you do not have any business relationship with us, the personal data we collect is also used for information or contact purposes based on a legitimate interest.

## marketing

Akelius may market our offers to you by e-mail and other channels, if you have consented to such marketing.

You can revoke your consent to receiving these e-mails or other electronic messages from us at any time.

Akelius provides instructions on how to do this in our marketing.

You can also contact us using the contact details at the end of this general information.



## transfer of personal data

In some cases, and for the purposes set out above, we may transfer your personal data to the processor engaged for Akelius Group companies, if they process your personal data on our behalf.

Such processors are for example IT suppliers, security services, and disturbance respondents.

The countries to which personal data may be transferred are Sweden, Germany, the United Kingdom, Denmark, France, Canada and the USA.

Our processors can also process personal data on our behalf in other countries outside the EU.

Akelius will take appropriate measures to protect your personal data in cases of such transfers, for example by entering data processing agreements or other arrangements.

Canada has an adequate level of protection, according to an EU Commission decision on the adequacy of personal data in third countries, under Article 45 of the EU General Data Protection Regulation. Your personal data may be transferred to Canada without additional safeguards.

Akelius have taken necessary measures within our intra-group legal structure to safeguard any transfers of personal data to the USA and other countries outside the EU or EEA.

These measures include entering agreements containing standard data protection clauses, as adopted by the EU Commission under Article 46 of the EU General Data Protection Regulation.

Akelius may also share your personal data with authorities if we are required by law, verdict or decision.

This means your personal data may be transferred to countries other than where your landlord is based and the property where you are a tenant is located.

Akelius may also share your personal data with other third parties within or outside the EU or EEA, including outside the Akelius group.

For example with local authorities for housing allowances, central tenant associations, police and local law enforcement.

Also with municipality owned companies or similar if they request information to ensure that their invoicing is correct in terms of payee or invoice period, Art. 6 para. 1 (f) GDPR, Art. 6 para. 1 (f) GDPR or according to other national legal provisions.

Akelius may also use and disclose your personal data as we believe to be necessary or appropriate to enforce our terms and conditions and to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others. We may use, disclose or transfer your data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock, including in connection with any bankruptcy or similar proceedings.

If you want more information on how the Akelius group protects your data, see *contact details* below.

## how long

Akelius does not store your personal data longer than necessary for the purposes listed above or required by law. Then we delete or anonymize your personal data so that it can no longer be connected to you.

## tenants

Generally, we store your personal data during your tenancy. This means during the period in which we have obligations to you as landlord under the tenancy agreement. Akelius may use certain personal data on you, if you have terminated the tenancy agreement. This would be for the purpose of monitoring any remaining debt from the tenancy, until any such debt is paid.

Akelius may also store your personal data longer to determine, exercise or defend ourselves from legal claims, or if it is required by law. This would for example be if a tenancy agreement is terminated because the tenant has caused disturbances. In such a case, the landlord will store personal data like name, rental unit, move-out date and a short description of the reason for termination.

The landlord also stores all accounting information for as long as is required by applicable law.

### prospective tenants, mobile app users and website visitors

Generally, we store your personal data during the period which you have stated you are looking for an apartment.

This means during the period in which we have obligations to you under the agreement.

Akelius may use certain personal data if you have removed your application, for purposes of retaining you as a prospective tenant, up to six months after your relationship to us has ended. Akelius may also store your personal data for a longer period to determine, exercise or defend ourselves from legal claims, or if it is required by law.

### business partners, general information or making contact

The personal data processed by us for the fulfilment of the contract with our business partners will be stored until the expiry of the statutory provisions and then deleted, unless we have been obligated to longer storage or you have consented to storage beyond that, Art. 6 para. 1 (a) GDPR.

If you have no business relationship with us, we will store your information for a period of four years after our last contact with you, in order to allow you to contact us again, Art. 6 para. 1 (f) GDPR.

You always have the option to object to the collection and use.

## how Akelius protects personal data

The Akelius Group takes all necessary technical and organizational measures to protect your personal data from accidental destruction, accidental loss, accidental alteration, unauthorized disclosure, or unauthorized access.

In accordance with the General Data Protection Regulation, we are required to ensure a risk-appropriate level of security for your personal data.

This means that if necessary, the following must, for example, be ensured

- physical security in server rooms, virus protection, firewalls and access control according to industry standards
- encryption of personal data

- solutions for continuously ensuring confidentiality, integrity, availability and resilience in our of processing systems
- routines and processes for restoring availability and accessibility of personal data in the event of a physical or technical incident
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing

Any person acting in our name or on our behalf who is granted access to your personal data may only use it in accordance with our instructions.

No other processing is permitted unless required by law.

The basic rule is a need-to-know basis for information, i.e. only authorized personnel of the Akelius Group has access to your personal data.

Akelius does not collect any special categories of data, such as health data or ethnic origin data (Article 9 GDPR).

Akelius assumes no liability for content or images uploaded by the user independently and voluntarily. (Website, portal)

The user is hereby also instructed to not upload any personal data in any form that is not necessary for the required purposes.

This is because Akelius wishes to avoid receiving data that Akelius is not allowed to save.

## third party services

This privacy policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the website or mobile app links.

Please review any third-party privacy policies to learn how they handle your personal data.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, operating system provider, wireless service provider or device manufacturer, including with respect to any personal data you disclose to other organizations through or in connection with our mobile app.

## use of website and mobile app by minors

The website and app are not directed to individuals under the age of thirteen (13) and, we do not knowingly collect personal data from individuals under 13.

## your rights as data subject

You have a number of rights as data subject under applicable data protection legislation.

*Right of access* – you have the right of access to your personal data,  
which means you are entitled to a confirmation as to whether or not personal data concerning you is being processed.  
And where that is the case,  
access to the personal data and certain additional information on the processing.

*Right to rectification* – you have the right to rectification of inaccurate personal data concerning yourself,  
and to have incomplete personal data completed.

*Right to erasure* – you have the right to have your personal data erased if

- the personal data are no longer necessary in relation to the purposes for which they are processed
- you withdraw your consent to the processing and there is no other legal ground for the processing
- the processing of your personal data is not necessary for compliance with a legal obligation,  
for the establishment, exercise or defense of legal claims or archiving or scientific purposes

*Right to withdraw consent* – if you have consented to specific processing,  
you have the right to withdraw your consent at any time.  
The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

*Right to object* – you have the right to object and request a new assessment of legitimate interests when processing is based on these grounds.  
Akelius will then make a new assessment and will only continue processing,

in spite of your objection, if we can demonstrate compelling legitimate grounds which override your interests.

*Right to data portability* – you have a right to data portability, which means you are entitled to receive the personal data concerning yourself which you have provided us with, and to transmit those data to another controller.

*Right to restriction* – you have a right to restriction of your personal data, for example if you contest their accuracy or if you have objected to the processing as described above. In both cases this right is applicable during our processing and verification of your request.

*Right to lodge a complaint with the Privacy Commissioner* – you can lodge a complaint if you think we are in breach of applicable data protection regulation in processing your personal data, <https://www.priv.gc.ca/en/report-a-concern/>.

## contact details

If you have any questions about how the Akelius group processes your personal data, or if you want to exercise your rights as listed above, please contact us

Akelius Service Center: [toronto.servicecentre@akelius.ca](mailto:toronto.servicecentre@akelius.ca)  
Telephone: 416-932-8777

You can also contact Akelius Group Privacy Officer

Akelius Group Privacy Officer  
Box 38149  
100 64 Stockholm  
E-mail: [gpo@akelius.com](mailto:gpo@akelius.com)