

PRIVACY NOTICE – Rental Management

CapMan Plc (and the companies belonging to the same company group, hereinafter jointly referred to as "CapMan") is committed to keeping all personal data it collects and processes safe and secure and informing the data subjects promptly of all its data processing activities and on the rights of the data subjects.

This Privacy Notice is one of CapMan's 4 public Privacy Notices. It answers the following questions:

- *What kind of personal data does CapMan collect and process?*
- *Why does CapMan collect and process personal data?*
- *What are CapMan's information sources?*
- *How and with whom may the personal data be shared?*
- *How long is the retention time?*
- *What are the rights of the data subject?*
- *Who to contact?*
- *How does CapMan secure personal data?*

This is a Privacy Notice, which aims to provide information to the tenants of the properties owned by CapMan Real Estate Funds regarding the processing of personal data at CapMan in connection to CapMan's Rental Management. Please note that the data controller within CapMan regarding rental management is CapMan's subsidiary, CapMan Real Estate Ltd.

In this Privacy Notice, the data subjects, which are hereinafter jointly referred to as "**Data Subjects**", may be natural persons who are:

- Tenants of the rental properties
- Tenants of the shopping center commercial properties
- Contact persons and representatives of corporate tenants

1. What kind of personal data does CapMan collect and process?

Information related to communication

Basic contact information of all Data Subjects such as name, email address, telephone number, address, employer data and contact history data such as the correspondence and communication and given consents and prohibitions for purposes of processing personal data.



Information related to identification and legal requirements

The register may also contain other personal data that CapMan is obliged to collect under mandatory legislation. This information includes, but is not limited to, the following: date of birth, social security number, information of credit history and bank account details.

2. Why does CapMan collect and process the personal data?

Rental Management

Personal data is also collected and processed for the purpose of CapMan's Rental Management including rental agreement negotiations, decision-making and legal due diligence. Processing for this purpose is based either on fulfilling contractual obligations or legal requirements.

Legal obligations

CapMan collects and processes personal data in order to fulfill its obligations under mandatory legislation regarding real estate transaction and leasing operations. For instance, CapMan conducts a due diligence before acquiring any property and may process personal data as a part of the due diligence process. Further, CapMan enters into written lease agreements with all tenants and may need to process personal data on this purpose. In case a Data Subject refuses to provide CapMan with any obligatory information, CapMan may not be able to enter into a business relationship or to operate in normal course of business with the Data Subject.

Development of rental management

CapMan may also process personal data in order to contact, maintain, develop and update CapMan's rental management operations. Processing for this purpose is based on a consent given by the Data Subject or on a contract made between the Data Subject and CapMan.

No other purposes

CapMan does not process the collected personal data for any other purposes without informing the Data Subject in advance of that other purpose. The collected data is not processed for automated decision-making (including profiling).

3. What are CapMan's information sources?

Personal data is mainly collected from the Data Subject himself/herself, from their employer entity or from CapMan's business partner.

Personal data can be also collected from publicly available or other sources such as official registers maintained by Patent and Registration Offices, the National Bureaus of Investigation and



the Finnish Business Information System (YTJ). CapMan may also collect personal data from the registers of credit rating bureaus such as Suomen Asiakastieto Oy.

The information sources may vary depending the domicile and/or the citizenship of the Data Subject.

4. How and with whom may personal data be shared?

CapMan may share personal data with others (e.g. third parties) such as the public authorities, suppliers and business partners who may, due to such sharing and depending on the situation in question, act as a data processor or become a controller of personal data.

Capman may fulfil an above mentioned transfer of personal data only under a contractual obligation or a legislative obligation to do so and only if it is necessary for processing personal data systematically and effectively, protecting CapMan's and/or the Data Subjects' safety or the safety of others, investigating fraud, or responding to a government request.

Personal data may also be shared with:

- **Business partners and third party service providers** such as outsourced rental management service providers and legal advisors for the purpose of co-operation in the context of rental management and legal due diligence. CapMan shares only the information that is necessary to share in order to fulfill the legal obligations.
- **trusted IT service providers such as the rental management software provider**, for the purposes of systematic and organised handling of personal data e.g. IT service providers, IR & Communication consultants or Euroclear Finland Oy. However, at all times, these trusted service providers act on CapMan's behalf and CapMan is responsible for processing of personal data;
- **competent public authorities** when permitted or required in order to comply with applicable mandatory laws or rules of stock exchange, by order of a court or a request, which is made by a competent authority with legal rights to access such information.

Transfer of personal data to third countries

Personal data may also be transferred to countries outside of the EU or EEA ("third countries"), but only during exceptional circumstances. Such transfer is conditional to the EU Commission assessing that the level of data protection is adequate in the target country, there are necessary standard contractual clauses in place to safeguard the transfer and/or the transfer is specifically agreed upon with the Data Subject.



5. How long is the retention time?

The basic rules for retention are that personal data is retained only for as long as necessary to fulfill the purpose of processing or as long as it is required by law.

Basic personal data will be retained only as long as necessary to manage the business relationship or other interaction with the Data Subject. The data will be deleted after a reasonable period of time has lapsed from the last contact between the Data Subject and CapMan.

Personal data collected under mandatory legislation purposes will be retained as long as required by law, for example bookkeeping or accounting (10 years from the end of the accounting year. Please note that the data retention times may differ since they are subject to local law.

6. What are the rights of the Data Subject?

A Data Subject is entitled to have access to personal data concerning him or her in the register, managed by CapMan, and to request CapMan to correct, update or remove personal data at any time. To the extent required by applicable data protection law, a Data Subject has a right to object or restrict data processing and request data portability, i.e. the right to receive the personal data in a structured, commonly used machine-readable format and transmit the personal data to another controller.

Data Subjects should acknowledge that certain information is strictly necessary for the performance of a contract or for compliance with a legal obligation of CapMan, which may restrict the Data Subject's rights listed above. In case the data processing is based on the consent given by the Data Subject, the Data Subject may at any time contact CapMan and cancel the consent for processing personal data, e.g. opt-out of receiving marketing messages.

6. Who to contact?

Controller and Controller's representative

Name: CapMan Plc

Business ID: 0922445-7

Address: Ludviginkatu 6, 00130 Helsinki

Phone: +358 207 207 500

Name: Antti Kiviluoto

Title: IT Director

Email: antti.kiviluoto@capman.com

Phone: +358 207 207 564



Competent authority

If the Data Subject finds violation to his or her legal rights, he or she has the right to file a complaint with the national Data Protection Authority or another Data Protection Authority within the EU or the EEA.

The Data Protection Ombudsman acts as the supervising authority in Finland. You can find the contact information of the Data Protection Ombudsman through this [link](#). Please send any requests regarding the above-mentioned rights to the contact person at CapMan whose contact details can be found above.

CapMan