

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

**last updated: 2019-05-06**

## 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

Your landlord is controller of your personal data for you as tenant.

If you are not sure which legal entity in the Akelius group is your landlord and this is not stated in your tenancy agreement, or if you do not have your landlord's contact details,

contact Akelius Service Center, see contact details below.

## prospective tenants, website visitors and mobile app users

Akelius Residential Property AB (publ) is controller of your personal data if you are a prospective tenant, mobile app user or a website visitor.

Akelius Residential Property AB (publ),  
Reg.No. 556156-0383  
Svärdvägen 3A  
Box 104  
182 12 Danderyd  
Sweden

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

## **website visitors and mobile app users**

Note that when you download and use our mobile app, we and our service providers may track and collect app usage data,

such as the date and time the app on your device accesses our servers and what information and files have been downloaded to the app based on your device number.

Akelius uses [Hotjar](#) to better understand our website visitors' needs and to optimize this service and experience.

Hotjar is a technology service that helps us better understand our website visitors' experience.

For example how much time they spend on which pages, which links they choose to click, what users do and don't like.

This enables us to build and maintain our service with user feedback.

Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices, in particular

- 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.

Cookies are also used for this purpose. Information about these can be found [here](#).

Hotjar stores this information in a pseudonymized user profile.

Neither Hotjar nor Akelius will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on [this link](#).

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

# why we process 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 manner.

## tenants

<i>purpose</i>	<i>legal basis</i>
<p>To fulfill our end of the tenancy agreement with you and to administer your tenancy agreement, for example to</p> <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>	<p>Fulfilling our obligations under the tenancy agreement or take measures on your request prior to entering the tenancy agreement.</p>
<p>To fulfill our legal obligations, for example by</p> <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>	<p>Fulfilling the landlord's legal obligations under for instance social law, tax law or accounting legislation.</p>
<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.</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>The landlord's legitimate interests, which is the landlord's ability to</p> <ul style="list-style-type: none"> <li>- improve and develop its services as landlord</li> <li>- provide services to you</li> <li>- maintain high security</li> <li>- maintain effective business operations</li> <li>- maintain good relations between you and your landlord</li> </ul>
<p>To be able to adapt your apartment in connection with your application for</p>	<p>If you submit an application for adaptation for disabilities to your landlord,</p>

adaptation for disabilities.	your landlord will request specific consent from you.
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## prospective tenants, mobile app users and website visitors

<i>purpose</i>	<i>legal basis</i>
To administer your application when you apply for an apartment and to control that you fulfill our requirements.	To take measures on your request before entering a tenancy agreement with us.  If you apply for an apartment with adaptation for disabilities, we will collect your specific consent.
Personalization of our offers of rental apartments, for example to <ul style="list-style-type: none"> <li>- provide personalized offers based on information from your device or equipment</li> <li>- provide personalized content based on your data which we process</li> <li>- offer direct marketing, including advertising, offers and recommendations adapted based on your data which we process</li> <li>- analyze how Akelius' website is reached, used or working</li> <li>- analyze how users interact with Akelius' mobile app.</li> </ul>	Akelius' legitimate interests in being able to provide and market our services to improve our offer.

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

## transfer of personal data

Akelius may transfer your personal data to third parties who are contractors to Akelius or to your landlord in some cases and for the purposes stated above.

These third parties are for example IT suppliers, construction contractors, facility services,

property management,  
security services, disturbance respondents and  
other units in the Akelius group.

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

Our IT suppliers may also process personal data  
on our behalf in other countries within or  
outside the EU or EEA.

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.

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.

For example, we store all accounting information for as long as is required by applicable law.

## how Akelius protects personal data

Akelius, your landlord and our IT suppliers take all technical and organizational measures to protect your personal data from for example accidental destruction, loss or alteration, and unauthorized sharing and access.

This means that Akelius, your landlord or our IT suppliers when appropriate will use for example

- 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

## third party services

This privacy policy does not address, and Akelius is 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, Akelius is 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, subject to applicable data protection legislation:

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

*Right to erasure* – 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, 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* – 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* – the right to data portability, meaning 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* – the 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 Information Commissioner's Office* – if you think we are in breach of applicable data protection regulation in processing your personal data, [www.ico.org.uk](http://www.ico.org.uk).

## 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: [service@akelius.co.uk](mailto:service@akelius.co.uk)  
Telephone: 0800 014 8579

You can also contact Akelius Group Privacy Officer:

Akelius Group Privacy Officer  
P.O Box 104, SE-182 12 Danderyd  
E-mail: [gpo@akelius.com](mailto:gpo@akelius.com)  
Group Privacy Officer, Demetris Syllouris