

ALLTIME GROUP OY – PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

1. DATA CONTROLLER

Alltime Group Oy and its affiliated companies
Business ID: 2035088-4
Address: Konetie 20, 90620 Oulu, Finland
Phone: 010 583 3000
(Hereinafter referred to as "Alltime" or "we")

2. CONTACT INFORMATION FOR MATTERS RELATING TO THE PROCESSING OF PERSONAL DATA

Data Protection Officer: Antti Weckström
Kiitoradantie 3, 01530 Vantaa
Email: antti.weckstrom(at)alltime.fi

3. WHAT DATA DO WE PROCESS?

Alltime processes only relevant and necessary personal data when an individual interacts with Alltime. These individuals may include those interested in Alltime's services, residents of housing companies that are our clients, property managers, and corporate contact persons.

We process this data to respond to requests for quotations, event registrations, or to perform work tasks for the client.

The basic personal data required for processing includes the following:

- Name
- Address
- Phone number
- Email address for certain customer contact persons
- Date of birth in cases where we must verify the identity of a customer*
- Relationship to the property (e.g. resident, shareholder, property manager, job title in the company on whose behalf the person contacts us)

*The data controller performs door openings for housing companies/residents, where the resident's identity must be verified to ensure the door is opened on a valid basis. The customer is voluntarily asked to show proof of identity so that the property maintenance personnel can verify it. Additionally, the data controller requests the date of birth when receiving change of address notifications to confirm the accuracy of resident information and practical matters related to the residence.

We do not engage in profiling based on collected personal data.

A separate privacy notice has been prepared for video surveillance carried out by our company, which describes in more detail the situations and purposes for processing footage recorded by the cameras. That privacy notice is available upon request.

4 PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

We process the personal data described in section 3 to provide our services (such as maintaining the resident register, verifying door openings, and processing change of address notifications), for customer relationship management, customer acquisition, and marketing.

As part of maintaining customer relationships, we may send newsletters to our customers' contact persons and provide information about our activities.

The legal basis for Alltime's processing of personal data is the performance of a service agreement and the legitimate interest of the data controller.

When a resident or other individual contacts Alltime through our website to submit a work request or job application, we ask for their consent to process their personal data. In these cases, the legal basis for processing personal data is the individual's consent.

Only persons specifically appointed for this task are authorised to process personal data.

5. REGULAR SOURCES OF PERSONAL DATA

We collect and, when necessary, update personal data of our customer representatives and residents when they contact us, purchase or order services from us, or visit our website.

We also collect personal data from the property managers of the housing companies that are our customers, as well as from the Population Register Centre.

Providing personal data to Alltime is not mandatory, but if you choose not to provide your personal data, we may not be able to offer our services to you.

6. RECIPIENTS AND DISCLOSURE OF PERSONAL DATA

Personal data may be disclosed to Alltime's IT service partners for the purposes described in this notice.

We use third-party IT services in our operations, where personal data is properly categorised, and its use can generally be controlled and monitored solely by the data controller.

Like Alltime, service providers also comply with the EU General Data Protection Regulation (2016/679).

If we transfer personal data to an external service provider, we ensure by appropriate contractual arrangements that personal data is processed only for the purposes described in this notice, even in such situations.

Service providers processing personal data operate primarily in Finland. Data is not transferred outside the EU or EEA.

7. DATA RETENTION PERIOD

We retain the personal data we process until further notice and for as long as necessary to fulfil the purpose of the processing.

When a resident moves out of a property managed by Alltime, their personal data will be deleted from our systems within a reasonable period of time.

8. RIGHTS OF THE DATA SUBJECT

The data subject has the following rights under data protection legislation:

- **Right of access and inspection:** The data subject has the right to request confirmation of whether their data is being processed and to inspect the data held about them. We may ask the data subject to specify their request for access. The data subject also has the right to request that the data controller corrects inaccurate or incorrect personal data without undue delay.

- **Right to erasure:** In certain situations (e.g. if the data subject withdraws consent on which the processing is based), the data subject has the right to have their data erased without undue delay, unless there is a legal reason to retain it.

- **Right to restrict processing:** In some legally defined situations, the data subject may have the right to request the restriction of processing.

- **Right to object to processing:** The data subject may have the right to object to the processing of their personal data based on their particular personal situation, if the processing is based on legitimate interest. In such a case, the data subject must specify the particular situation on the basis of which they object to the processing of their personal data, and we are obliged to comply with the request unless there is a compelling legitimate reason that overrides the interests, rights and freedoms of the data subject, or if the processing is necessary for the establishment, exercise, or defence of legal claims.

- **Right to lodge a complaint with the supervisory authority:** The data subject has the right to lodge a complaint with the supervisory authority

regarding any perceived shortcomings in the processing of personal data. In Finland, the supervisory authority is the Data Protection Ombudsman: tietosuoja(at)om.fi.

To exercise the above rights, the data subject must contact the data protection officer appointed by the data controller in writing. Alltime reserves the right to verify the data subject's identity before taking any action.

This privacy notice was updated on 11 February 2025.

Alltime monitors legislative developments and official guidance and continues to develop its services accordingly. Therefore, Alltime reserves the right to update this privacy notice as necessary.