

## **Privacy Policy 20 February 2026**

### **1. Data Controller**

Pia Westerlund Oy, PW Koti (Business ID: 2964678-8)  
Työpesintie 217  
54850 Lemi  
Finland

### **2. Person Responsible for the Register / Contact Person**

Pia Westerlund

### **3. Name of the Register**

Privacy Policy for Customer and Assignment Registers.

### **4. Purpose of Processing Personal Data**

Personal data is processed for the following purposes:

- Customer identification
- Recording information related to the sale and rental of apartments, holiday homes, commercial properties, and other real estate
- Sale of apartments
- Rental of apartments
- Buyer services
- Maintaining assignment records
- Collecting customer feedback
- Fulfilling legal and regulatory obligations

### **5. Data Content of the Register**

In real estate brokerage, the following personal data may be collected from clients, buyers, and potential buyers. In rental brokerage, corresponding data may be collected, where applicable, from landlords, tenants, and rental applicants.

Collected data may include:

- Name
- Date of birth
- Personal identity number
- Address and previous address
- Telephone number
- Email address
- Language of communication
- Information on political exposure (Politically Exposed Person, PEP)
- Identification document details or copy used for identity verification
- Guardianship or representation information
- Marital status
- Occupation
- Length of employment
- Household composition
- Information about pets

- Income and asset information
- Credit and payment behavior information
- Housing benefit information
- Lease agreement details
- Rent payment information
- Information on the origin of funds
- Rental deposit information
- Information on possible pledges related to the brokerage property
- Any other information provided by the customer

## **6. Regular Sources of Information**

All sources of information are used in accordance with applicable legislation.

Personal data is primarily obtained from the data subject themselves:

- From the client in connection with signing the brokerage agreement
- From the buyer or potential buyer in connection with a purchase offer or transaction
- From the tenant when concluding a lease agreement
- From a rental applicant through a rental application
- From individuals interested in a property during property viewings

## **7. Regular Disclosures of Data**

Personal data may be disclosed to a debt collection agency for the recovery of receivables. Personal data may also be disclosed to an insurance company or legal representative in connection with presenting or defending legal claims.

Information may be disclosed to the supervisory authority of brokerage activities (Regional State Administrative Agency) or other authorities as required by law.

Handling brokerage assignments requires disclosure of certain information to the counterparty of the assignment. For example:

- Information about a person who has made a purchase offer must be disclosed to the seller for decision-making purposes.
- In a transaction, the seller's information is disclosed to the buyer and the buyer's bank in the form of a deed of sale.

Transaction data is disclosed to the Finnish Association of Real Estate Agencies (KVKL) for storage in its Price Monitoring Service (HSP).

The data controller does not disclose other customers' personal data to third parties unless required by law.

Personal data is not transferred outside the EU or EEA.

## **8. Principles of Register Protection**

### **8.1 Manually Maintained Register**

Personal data stored in paper format and other manual materials are kept in locked premises.

### **8.2 Electronic Register**

Data is protected by appropriate technical and organizational measures.

Paper materials are stored in locked premises.

Electronic data is protected by technical safeguards, and access rights are granted only to persons who require access for the performance of their duties.

PW Koti personnel are bound by confidentiality obligations. Staff are trained and instructed on lawful processing of personal data.

The network and equipment of the website service provider hosting the register are protected by firewalls and other technical security measures.

### **9. Data Retention Periods**

Legislation requires that personal data contained in brokerage assignment registers be retained for five (5) years after the termination of the assignment.

After this period, data may be retained as long as necessary due to potential legal actions. If the personal data concerns an individual searching for a property and is not related to a specific brokerage assignment, the data is retained for three (3) years, unless the individual withdraws their consent to the processing of personal data.

### **10. Right of Access**

Data subjects have the right to inspect all information concerning them that has been stored in the register.

Requests for access must be submitted in writing in the form of a signed letter or email and sent to the person mentioned in Section 2.

#### **Contact details:**

PW Koti

Pia Westerlund

[pia.westerlund@pwkoti.fi](mailto:pia.westerlund@pwkoti.fi)

+358 44 980 1085

### **11. Right to Rectification**

Upon request by the data subject, PW Koti shall, without undue delay, rectify, delete, or supplement incomplete, unnecessary, inaccurate, or outdated personal data stored in the register, in accordance with the purpose of processing and applicable legislation.

Requests for rectification must be submitted to the person named in Section 2.

### **12. Other Rights of the Data Subject**

The data subject also has the right to:

- Request deletion of their personal data or restriction of processing
  - Object to the processing of their personal data
  - Lodge a complaint with the supervisory authority
  - Be informed of a personal data breach concerning their personal data
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