

general information on the Akelius Group's processing of personal data

last updated 2024-02-14

This general information on the Akelius Group's processing of personal data governs the manner in which Akelius Group and its affiliates ("Akelius," "we", "us", or "our") collect, use, disclose, and protect the personal information obtained from users ("user", "you", or "your") of the websites <https://www.akelius.com>, <https://www.akelius-foundation.org>, <https://www.akelius-skog.se>, <https://www.akelius-technology.com>, <https://www.akelius-math.com>, <https://www.akelius-languages.com>, <https://www.akeliusinvest.com> ("Websites").

This general information on the Akelius Group's processing of personal data applies to the Websites and all products and services offered by Akelius.

usage data

Usage data is collected automatically when using services.

Usage data may include information such as your device's internet protocol address, for example IP address, browser type, browser version, the pages of our services that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access services by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our services or when you access services by or through a mobile device.

who is processing your personal data

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.

Since the Akelius Group consists of different legal entities, the legal entity responsible for the processing of your personal data is dependent on the purpose for which your personal data is collected.

It is the Swedish company Akelius Residential Property AB, that is responsible for most of the processing of personal data described within this general information on the Akelius Group's processing of personal data. However, for some processing purposes it is the Akelius local affiliate of your market who is the responsible legal entity.

For each specific processing purpose, you will be informed which entity is responsible for processing your personal data.

controllers' contact information

Akelius Residential Property AB
Engelbrektsgatan 9-11
Box 5836
102 48 Stockholm

affiliates

Akelius Technology AB
Engelbrektsgatan 9-11
Box 5836
114 32 Stockholm, Sweden

Akelius Foundation
P.O. Box AB-20415, 700 Don Mackay Boulevard,
Marsh Harbour, Abaco, Bahamas

Akelius Skog AB
Engelbrektsgatan 9-11
Box 5836
114 32 Stockholm, Sweden

Akelius Languages Online gGmbH
Pohlstraße 20
10785 Berlin

Akelius Math AB
Box 5836
102 48 Stockholm

Akelius Invest
1100 East Bay Street
Abaco, Marsh Harbour
BS-CO, Bahamas

local affiliates

Canada

Montreal, Ottawa
511 Place D'Armes, bureau 100
Montreal, Québec, H2Y 2W7

Toronto
533 College Street
Toronto, Ontario, M6G 1A8

USA

Austin
241 A Street
Boston, MA, 02210

Boston
300 A Street, 5th Floor
Boston, MA. 02210

New York
110 William Street, Suite 1810
New York, NY 10038

Washington DC
1620 Eye Street NW, Suite 703
Washington, DC 20006

Cyprus

Aischylou Street 80
1011 Nicosia
Cyprus

France

company type
Société à actions simplifiées (SAS)
SIRET number from our latest K-BIS
VAT number - FR05804128866
G card number - CPI 7501 2015 000 000 507
Delivered by CCI Paris Ile-de-France

Germany

Akelius Business Management GmbH
Franklinstraße 26a
10587 Berlin

Akelius Technology GmbH
Franklinstraße 26a
10587 Berlin

Akelius Languages Online gGmbH
Pohlstraße 20
10785 Berlin

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.

My Pages users and website visitors

If you are a My Pages user or a website visitor, the legal entity that makes the My Pages 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 general information on the Akelius Group's processing of personal data, and for the website and My Pages, 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 My Pages or the website, art. 6 para. 1 (f) GDPR.

personal data we process

tenants

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

personal data		
essentials	transaction information	additional information
<ul style="list-style-type: none">- name- date of birth- social security number or other national identification number	<ul style="list-style-type: none">- rental payments- deposits- method of payment and amount	<ul style="list-style-type: none">- information about occupants other than the tenant such as family members' or dependents' names

<ul style="list-style-type: none"> - address - telephone number - e-mail address 	<ul style="list-style-type: none"> - credit card information where applicable - information about a guarantor and trustee if applicable 	<ul style="list-style-type: none"> - 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.

My Pages users and website visitors

On our website, mobile applications, or My Pages, we partly apply some procedures to analyze users' 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 Websites

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.

Find information on essential and other cookies on **cookie policy** page.

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

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

purposes and legal basis to process your personal data

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

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.

purpose	legal basis
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">- establish, enter into and fulfill the tenancy agreement- administer rent payments- administer housing allowances- manage the property	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">- communicating with social services- providing information on applicable rents- fulfilling our accounting obligations	Fulfilling the landlord's legal obligations under for instance social law, tax law, or accounting legislation, art. 6 para. 1 (c) GDPR.
Exercise or defense of legal claims, for example by putting forward evidence such as reports on disturbances or nuisances.	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>For administrations of Akelius' operations, for example to manage properties such as</p> <ul style="list-style-type: none"> - sales of properties - deposits for future rent payments - to ensure security in our IT environment - to produce statistics on our operations - measures taken for the safety and wellbeing of personnel and contractors to the Akelius Group 	<p>Legitimate interests of the Akelius Group mean the ability to</p> <ul style="list-style-type: none"> - improve and develop services - provide services to you - ensure a high level of safety - maintain effective business operations - maintain good relations to you, art. 6 para. 1 (f) GDPR
<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>

My Pages users and website visitors

purpose	legal basis
<p>To manage your apartment application and check if you meet our requirements.</p>	<p>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.</p> <p>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.</p>
<p>Personalization of our offers for rental apartments, for example</p> <ul style="list-style-type: none"> - to provide personalized offers based on information obtained through your device or equipment - to provide personalized content based on your data processed by us - to offer direct marketing, including advertising, offers, and referrals that have been customized based on your data processed by us 	<p>Legitimate interests of Akelius in offering and marketing our services to improve our offer, art. 6 para. 1 (f) GDPR.</p>
<p>Providing the content of the website accessed by you</p>	<p>Legitimate interests in presenting the website content accessed by the user.</p>

<p>Analysis of our users' needs and optimization of the offer on our websites</p>	<p>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.</p> <p>Find more information on cookie policy.</p>
<p>My Pages</p>	<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 My Pages's usage analysis through your consent, which you can revoke at any time.</p> <p>Find more information on cookie policy.</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

We 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. We provide 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 art. 45 of the EU GDPR.

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 art. 46 of the EU GDPR.

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
- local law enforcement
- 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, 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.

retention of your personal data

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.

If you have terminated the tenancy agreement, we may use certain personal data on you. This would be for the purpose of monitoring any remaining debt from the tenancy, until any such debt is paid.

Akelius stores 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 applications 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 uses 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.

disclosure of your personal data

business transactions

If Akelius is involved in a merger, acquisition or asset sale, your personal data may be transferred. We will provide notice before your personal data is transferred and becomes subject to a different general information on the Akelius Group's processing of personal data.

law enforcement

Under certain circumstances, Akelius may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities, for example a court or a government agency.

other legal requirements

Akelius may disclose your personal data in the good faith belief that such action is necessary to

- comply with a legal obligation
- protect and defend the rights or property of Akelius
- prevent or investigate possible wrongdoing in connection with our services
- protect the personal safety of users of our services or the public
- protect against legal liability

delete your personal data

You have the right to delete or request deleting the personal data that we have collected on you by contacting us.

Our services give you the ability to delete certain information on you from within the services.

You may update, amend, or delete your information at any time by signing into your account, if you have one,

and visiting the account settings section that allows you to manage your personal information.

You may also contact us to request access to correct or delete any personal information that you have provided to us.

Please note that we may need to retain certain information when we have a legal obligation or lawful basis to do so.

security of your personal data

The security of your personal data is important to us.

However, remember that no method of transmission over the Internet, or method of electronic storage is 100% secure.

While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

We take 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 GDPR, we are required to ensure a risk-appropriate level of security for your personal data. This means that, if necessary, the following must 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 of our 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, for example only authorized personnel of the Akelius Group has access to your personal data.

We assume no liability for content or images uploaded by the user independently and voluntarily. 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 we wish to avoid receiving data that we are not allowed to save.

third-party services

Websites and mobile applications may contain links to third-party websites. We do not control the content or links that appear on these websites and are not responsible for the practices employed by websites linked to or from Websites or our mobile applications. These sites and services may have their own privacy policies and customer service policies.

Browsing and interaction on any other websites, including websites that have a link to Websites, is subject to that website's own terms and policies.

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 applications.

children's privacy

Our services do not address anyone under the age of thirteen. We do not knowingly collect personally identifiable information from anyone under the age of thirteen.

If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us.

If we become aware that we have collected personal data from anyone under the age of thirteen without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

what your rights and how to exercise them

You have several rights as data subject under applicable data protection legislation.

right of access

You have the right of access to your personal data. This means you are entitled to a confirmation whether your personal data is being processed or not.

When it 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, 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 you which you provided us 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.

identity verification for request submissions

Akelius takes privacy and data protection seriously.

When you exercise your rights as outlined in our general information on the Akelius Group's processing of personal data, we are committed to verifying the identity of the individual submitting the request to ensure the security and protection of personal information. This helps us prevent unauthorized access or disclosure of personal data.

To verify your identity, we may request certain information or documentation from you. The specific verification requirements may vary depending on the nature of your request and applicable laws.

The verification process includes the following steps

1. **request submission**

Submit your request by email mentioned in this general information on the Akelius Group's processing of personal data or via customer service. Provide as much details as possible to help us locate and identify the relevant personal information.

2. **verification information**

We may ask you to provide certain information to verify your identity. This information may include your full name, contact details, account information, if applicable, and any additional information necessary to authenticate your identity. We may also request specific documents, such as a government-issued identification document or proof of address.

3. **review and assessment**

Our team will review the information and documents provided to assess their validity and match them with the personal information we have on record. This process helps us confirm that the request is being made by the individual who has the right to access or modify the data.

4. **communication and additional steps**

Depending on the outcome of the initial verification process, we may contact you to request further clarification or additional information if needed. We aim to keep the communication clear and secure while ensuring the protection of your personal information.

5. **response and action**

Once your identity has been verified successfully, we will proceed with addressing your request as required by applicable privacy laws and regulations. This may involve providing access to your personal data, rectifying inaccuracies, deleting information, or

taking other appropriate actions based on the nature of your request.

We understand that the verification process may require effort and time, but it is essential for safeguarding your personal information and ensuring that only authorized individuals can access or modify it. We appreciate your cooperation and understanding in this regard.

If you have any questions or concerns about the identity verification process or require further information, please service center using the details provided in the contact on Websites.

sharing your personal information

We do not sell, trade, or rent users' personal identification information to others.

We share your personal information with third-party service providers who assist us in operating Websites, conducting our business, or providing services to you, subject to their confidentiality obligations.

We share your information if required by law or in response to a valid request by a public authority.

transfer of your personal data

Your information, including personal data, is processed at the Akelius' operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Akelius will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this general information on the Akelius Group's processing of personal data and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

changes to this general information on the Akelius Group's processing of personal data

We have the discretion to update this general information on the Akelius Group's processing of personal data at any time.

When we do, we will revise the updated date at the top of this page.

We encourage users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect.

You acknowledge and agree that it is your responsibility to review this general information on the Akelius Group's processing of personal data periodically and become aware of any modifications.

contact us

If you have any questions or concerns regarding how the Akelius processes your personal data, or if you want to exercise your rights as listed above, please contact us at **gpo@akelius.com**.

Akelius Service Center

Canada

Toronto

416 - 932 8777

toronto.servicecentre@akelius.ca

Montreal

514 - 525-8777

montreal@akelius.ca

Germany

0800 - 25 35 487

info@akelius.de

Sweden

010 - 722 31 00

service@akelius.se

UK

0800 014 8579

service@akelius.co.uk

USA

servicecenter@akelius.us

New York Region

917-972-0404

Boston Region

857-930-3900

Washington DC Region

202-753-3986

you can also contact

Akelius Group Privacy Officer.
Box 38149
100 64 Stockholm
gpo@akelius.com

for Canada
P.O Box 104, SE-182 12 Danderyd

This general information on the Akelius Group's processing of personal data is effective as of the date mentioned of the top of this document and supersedes any prior versions.