

Datscha Data Privacy Policy

1. Summary

This Data Privacy Policy (this "**Policy**") applies to Datscha AB/ Datscha Ltd, and Datscha Oy ("**Datscha**", "**us**" or "**we**") when we process personal data of persons that visit our webpage, product, <https://system.datscha.com> ("**System**"), or contact us for general queries or other purposes. If you are a representative of a customer, or service provider, you will have received information separately on how we process your personal data.

Datscha processes personal data in accordance with applicable legislation, including the General Data Protection Regulation 2016/679 ("**GDPR**").

We will process the personal data about you that you provide to us when you contact Datscha through our website or otherwise interact with us, such as your name, email address, telephone number and other contact information. The use of such personal data is necessary for Datscha to be able to respond to your questions, queries or to otherwise communicate with you. We must ask you to never provide any data to us that could be considered sensitive.

We are also using cookies in order to personalise content and ads, to provide social media features and to analyse our traffic. For further information about how we use cookies and similar technologies, please see our [cookie policy](#).

For users of the System, we collect some more information about how the System is used by you.

You have certain rights relating to how Datscha process your personal data. Your rights include:

- access to and rectification of your personal data;
- objection to the processing of or the restriction of the processing of personal data;
- the right to request deletion of your personal data; and
- the right to data portability, where technically feasible.

Please note that your rights, for example to object and/or delete personal data about you, will vary depending on the processing purpose and our legal ground for processing your data. You can read more about your rights below, and if you have any questions about your rights as stated above, please see further how you can enforce your rights in section 7.

If you have any questions regarding Datscha's processing of personal data, you are always welcome to contact Datscha's data protection responsible individuals, at gdpr@datscha.com.

You always have a right to lodge a complaint with a competent data protection authority if you are dissatisfied with how we process your personal data. See section 10 below.

This Policy includes the following sections:

1. Summary
2. What is "personal data" and "processing of personal data"?
3. Personal data processed by Datscha in relation to external parties
4. How is the personal data processed?
5. To what categories of third parties will the personal data be disclosed?
6. To what countries will my personal data be transferred?
7. What are my rights with regards to my personal data?
8. How do you make use of your rights?
9. How will Datscha act when receiving a request?
10. What should you do if you have any complaints?
11. Updates to this Policy
12. Contact details

2. What is "personal data" and "processing of personal data"?

The term "**personal data**" as used in this Policy is any piece of information that, either on its own or together with any other pieces of information, can be traced back to a living individual, and any other data that qualifies as personal data in accordance with the law applicable to Datscha.

This Policy covers all personal data that is in any form processed, including personal data that is kept, stored, collected, transferred, disclosed or otherwise handled.

3. Personal data processed by Datscha in relation to external parties

Personal data type and source	Purpose	Legal ground	Retention time or criteria
<p>Contact information - i.e. the information provided by you to Datscha such as name, postal address, email address and telephone number.</p> <p>Source: Directly from you</p>	To enable Datscha to administer and respond to requests from website visitors, such as enquires sent to us through our online platform.	Legitimate interest	Datscha will store the information as long as the information is relevant in order to handle your requests or questions.
	To enable Datscha to facilitate and register visitors in our office premises.		
	To provide and manage information, products and services which have been requested from Datscha. For example information related to ongoing projects or questions from the public and related correspondence.		
	To provide information about investments to potential investors which Datscha think may be of interest.		
	To evaluate offers from potential suppliers and service providers.		
	To protect, defend or enforce our legal rights, or those of others.		
	To respond to job applications.		
<p>Information related to job applications – i.e. photo, cover letter, certificates, credentials and resume.</p> <p>Source: Directly from you as a job applicant, or through recruitment services (which you have been informed by).</p>	To enable Datscha to administrate job applications and to contact potential recruits.	Legitimate interest	Datscha will store the information as long as the information is relevant to respond to your application but in no event longer than 8 months after the end of the recruitment process.
<p>IP address and other technical information related to your computer or mobile device – i.e. text or number files collected in cookies placed on your computer or mobile device.</p> <p>Source: indirectly from you (from your computer and/or mobile device).</p>	To analyse how our website is used and make it function.	Legitimate interest	Please see our cookie policy for more information.
<p>Information about you as a User of the System – i.e. Name, email address, telephone number, company association, how you use the System and data for supporting functions such as lists</p> <p>Source: Directly from you as a Customer representative, indirectly from your behaviour using the System</p>	To enable Datscha to administer and develop our website and the System.	Performance of Contract	Datscha will store the information as long as the information is relevant but might also store anonymized and aggregated information based on your, and others, usage of the System indefinitely.
	To enable functions and enhancements such as saving lists and settings.		
	To protect, defend or enforce our legal rights, or those of others.		
<p>Information that the User uploads – i.e. Data where the Customer is Data Controller such as rent rolls containing personal data e.g. name of tenants.</p>	To process data according to the instructions stated in the Data Processor Agreement	Data Processor Agreement	Datscha will store the information as long as the Data Processor Agreement is in place, unless stated

Source: Directly uploaded by the user as a Client representative			otherwise by European or National legislation or otherwise bound by contractual obligations.
--	--	--	--

4. How is the personal data processed?

Datscha will only process personal data for the purposes for which it was submitted to us and as set out in section 3 above. Datscha has taken appropriate technical and organizational measures for the protection of the personal data to ensure that only authorized persons are given access to the personal data.

5. To what categories of third parties will the personal data be disclosed?

Datscha Group Companies

Due to the fact that Datscha has several affiliates and subsidiaries that carry out business activities in Sweden, UK, Finland and Denmark, the personal data, depending on the reason for you contacting us, may be transferred to such affiliates and subsidiaries.

Companies engaged by Datscha

Your personal data may also be transferred to and processed by third party providers and suppliers which perform services for Datscha (data processors), to enable these companies to perform the services requested by Datscha. Services which may be requested include the provision of recruitment services, marketing services and IT services (such as CRM system providers). Only personal data that is necessary to fulfil the purposes stated in section 3, and to be able to handle your request or question, will be provided to these companies. All third party providers and suppliers must follow our instructions and applicable written data processor agreements and any other agreements that are in place between Datscha and its third party providers/suppliers, and must implement appropriate technical and organizational measures for the protection of the personal data.

When you, the Customer, is the Data Controller

The users may, in some circumstances, upload data to our product, such as rent rolls etc. If this data contains personal data, e.g. names of tenants, Datscha will become Data Processor and a Data Processor Agreement between the Customer and Datscha must be signed according to GDPR.

6. To what countries will my personal data be transferred?

A legal entity that receives personal data may be located in a country that offers a lower level of protection for personal data than the country where you live. Personal data may be transferred to a country, that offers a lower level of protection for personal data, but only if it is ensured that the personal data is adequately protected by the receiving parties in such countries.

Personal data that you submit to us, regardless of role, is not transferred to any countries outside EEA.

7. What are my rights with regards to my personal data?

Right to access and rectification

You have the right to request access to the personal data relating to you. This includes the right to be informed whether or not personal data about you is being processed, what personal data is being processed and the purpose of the processing. You also have the right to rectify or complete personal data if the personal data is inaccurate or incomplete.

Right to erasure

You may also request that your personal data be erased if e.g. the personal data is no longer necessary for the purposes for which it was collected or otherwise processed, if we do not have an overriding legitimate interest to process your personal data any longer and you have objected to the processing based on our legitimate interest, if the personal data have been processed unlawfully by us, or your personal data have to be erased in order to be compliant with a legal obligation under applicable data protection legislation. Please note that we may reject your request if the processing is permitted or required according to applicable law or any other legal ground.

Right to object and restriction

You are also entitled to request us to restrict the processing of your personal data, and to object to the processing of personal data if the processing is no longer necessary for the purposes it was collected or otherwise processed, if you believe the personal data may not be correct, if you believe that the processing is unlawful and/or if you have opposed to the processing based on our legitimate interest, where we do not have an overriding interest in relation to your privacy interest.

As soon as we become aware of any inaccurate personal data being processed, we will always rectify such Personal data without undue delay and notify you accordingly.

Right to Data Portability

If you request access to personal data about you that you yourself have provided and if the personal data is being processed automatically and/or in accordance with a contract between you and Datscha, you may request that the data is provided in a structured, commonly used and machine-readable format and you may also request that the personal data is transmitted to another controller, if this is technically feasible.

8. How do you make use of your rights?

Please send an email to the relevant contact person, as specified below in section 12, if you want to make a request in relation to the processing of your personal data. Please note that Datscha may contact you and ask you to confirm your identity to ensure that Datscha does not disclose your personal data to any unauthorized person. Datscha may ask you to specify your request before Datscha performs any actions.

9. How will Datscha act when receiving a request?

Once Datscha has confirmed your identity, Datscha will handle your request in accordance with applicable law. Please note that even if you object to certain processing of personal data, Datscha may still continue this processing if permitted or required to do so by law, for example to enable us to fulfil legal requirements, or fulfil obligations under a contract.

10. What should you do if you have any complaints?

You always have the right to lodge a complaint with the relevant authority in particular where you live, work or where an alleged infringement of the GDPR has occurred. The relevant authorities in the Nordic are:

Sweden: Datainspektionen (www.datainspektionen.se);

United Kingdom: Information Commissioner's Office (<https://ico.org.uk>);

Denmark: Datatilsynet (www.datatilsynet.dk); and

Finland: the Finnish Data Protection Ombudsman (www.tietosuoja.fi)

11. Updates to this Policy

In order to ensure that Datscha complies with data protection law, this Policy may be changed by us at any time. Datscha will publish any changes made.

Please notify Datscha of any changes to the personal data relating to you to enable us to process personal data accurately and securely (see contact details below).

12. Contact details

Our colleagues at the following email address are responsible in respect of personal data processing of Datscha and can answer any question related to such processing as well as helping you exercise your rights at gdpr@datscha.com.

Latest update on 28th of August 2019