

## PRIVACY POLICY TERMS

Welcome to read our privacy policy terms. Please read our privacy policy terms carefully before submitting your personal data to us and entering into contracts with us. Our privacy policy is an integral part of our contracts.

In given privacy terms, we describe how Fund Ehitus OÜ and our subsidiaries handle your personal data. When processing personal data, we comply with the principles of processing personal data in accordance with applicable law, including the General Data Protection Regulation (Regulation (EU) No 2016/679 of the European Parliament and of the Council of European Union) and we ensure that our processing of personal data is lawful, fair and transparent regarding the data subject and we process it in a way that ensures appropriate security.

**Personal data** is any information about an identified or identifiable natural person. Processing is an operation performed on personal data such as **collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.**

**Data subject** is a natural person whose personal data we process. Data subjects may be, for example, our customers who are natural persons, website visitors, job applicants or other individuals who turn to us. In the privacy policy terms, the data subject is referred to as "you".

### 1. Controller

Controller is a person who determines the purposes and means of the processing of personal data. In the meaning of given privacy terms, the controller is OÜ Fund Ehitus or any other body or associated company belonging to Fund Ehitus group (Fund Asset OÜ and its subsidiaries).

### Fund Ehitus OÜ contact information:

Veerenni 40a-81, 10138 Tallinn

Phone +372 680 0190

[info@fundehitus.ee](mailto:info@fundehitus.ee)

### 2. Legal basis and purpose of processing of personal data

We process your personal data solely on a legal basis, in particular for the performance of a contract with you, as well as in order to take steps at your request prior to entering into a contract.

We may also process your personal data in situations where we have a legitimate interest in processing your personal data (for example, to protect our rights in relation to contracts concluded with you) except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of your personal data. In addition, we have the right to process your personal data on the basis of an individually requested consent.

The main purpose of processing your personal data is the preparation, conclusion and performance of contracts with us, in particular contracts for the sale of real estate, and for submitting offers to you upon your request.

In addition, we process your personal data in order to comply with our statutory obligations, including accounting obligations, tax reporting obligations, etc.

The purpose of processing the data of candidates applying for job or internship is to assess the candidate's professional suitability for the corresponding position.

### **3. Collectable personal data**

We collect personal data that you have provided to us by email, phone, website, or meeting with us or during other events, and data that you have provided to third parties who are entitled to transmit data to us (for example, notaries).

The personal data we collect may include the following data and their changes: first and last name, personal identification code, telephone number, e-mail address, postal address, data contained in the contract concluded with us, including information about the sales object and information about marital status.

When applying for a job or internship, the data that you have submitted and the information collected from public sources is the data we process. In addition, we may ask for information that we have a legitimate interest in following from the requirements of the position to be filled. We assume that we can contact the persons who have been listed as recommenders by the candidate.

### **4. Transmission of personal data**

We will only transfer your personal data to the extent and in the form that is necessary for the purpose of processing the data, in particular with respect to the conclusion of contracts with you or the performance of contracts. For real estate sales contracts, we will disclose information to the contracting notary office and the persons managing the sales object (real

estate maintenance and management companies). If necessary, we also have the right to transfer your personal data to our authorized processors who have the access to the data which is necessary in order to provide service to us (accounting companies, debt collection companies). In addition, we have an obligation to transfer personal data to third parties (such as tax authorities, auditors, court or other officials) to whom the disclosure obligation derives from the law.

The data will be processed and stored on the territory of the European Union.

## **5. The period of personal data storage**

We will store your personal data only for as long as this is necessary to achieve the purpose of the data processing or our legitimate interest (including the purpose of protecting our rights), for example, in case of contracts concluded with you, we will keep your personal data at least until the expiry of the limitation period of claims arising from the agreement. As a general rule, we store data for 5 years, unless the legislation imposes a longer storing obligation. In case of applying for a job or internship, we keep your CVs for 1 year after a negative decision.

In the case of your personal data storing period, we comply with legal requirements and limitations, for example, personal data contained in the accounting records will be stored for 7 years.

## **6. Your rights regarding your personal data**

You have the right to:

- request access to your personal data;
- require amendment of data;
- require erasure of data;
- restrict processing of personal data;
- raise objections regarding processing of personal data;
- require transfer of personal data;
- the right that a decision based on automated processing is not adopted with regard to you;
- withdrawal of consent;
- file a complaint to the data protection supervisory authority ( [www.aki.ee](http://www.aki.ee)).

If you want to stop us processing your data, information about the use of data and the transfer of data to yourself or a third party in a commonly used format, please contact us at the above-mentioned contacts. In order to avoid misuse of your data and rights, we kindly ask you to submit the application, if possible, in personally signed format at our location or in in digitally signed format. We will respond to your request within a reasonable time.

## **7. Change of privacy policy terms**

We may make changes from time to time in our privacy policy. Up to date privacy policy is published on our website at [www.fundehitus.ee](http://www.fundehitus.ee).