

## Information on the processing of personal data

### Your integrity is important!

At Stiftelsen Stockholms Studentbostäder (Stockholms Studentbostäder), it is important to us that you feel secure as our Visitor, Customer, and/or Tenant when it comes to personal data. It is also important that you understand how we handle your personal data, which is why we encourage you to review our privacy policy below, which describes how and why we process your personal data.

### Personal data responsibility

Stockholm Studentbostäder org.nr. 802003-2887, Körnbärsvägen 2, 10432 Stockholm, is the data controller for the processing of personal data that we carry out ourselves or that is carried out by another company on our behalf.

### Definitions and terminology

Below is a list of important terminology and definitions that are used in this policy.

**Processing:** An action or combination of actions involving personal data or sets of personal data. Processing of personal data can include, for example, collection, registration, organization, structuring, storage, handling or modification, retrieval, reading, use, disclosure through transfer, dissemination or making available by other means, adjustment or combination, restriction, deletion, or destruction.

**Legitimate Interest:** When the data controller's interest in processing personal data outweighs the interests and fundamental rights and freedoms of the data subjects, the interest is considered legitimate.

**Visitor:** All individuals who visit our websites.

**Cookies:** A cookie is a text file created by the browser when you visit a website.

**Tenant:** Individuals who have a valid rental agreement with us.

**Customer:** Individuals who are on our housing queues.

**Sensitive Personal Data:** Personal data that, due to its nature, is considered particularly sensitive and thus requires stronger protection. Examples of such data include health information, data on ethnic origin, political opinions, or religion.

**Personal Data:** Any information relating to an identified or identifiable natural person.

**Storage:** The length of time the data controller retains personal data.

**Data Controller:** A natural or legal person, public authority, or other entity responsible for determining the purposes and means of processing personal data.

**Data Processor:** A natural or legal person, public authority, or other entity assigned to process personal data, in whole or in part, in accordance with the instructions of the Data Controller and on their behalf.

**Data Processing Agreement:** An agreement between the Data Controller and the Data Processor aimed at addressing responsibilities and ensuring that both parties comply with the GDPR during the contract period.

**Data Subject:** The individual whose personal data is being processed.

**Legal Basis:** A valid reason required under the GDPR to process personal data; this includes consent, performance of a contract, legal obligation, protection of vital interests, exercise of official authority, tasks carried out in the public interest, and legitimate interests.

**Third-Country Transfer:** When personal data is transferred to a third country, meaning a location outside the EU/EEA.

## When do we handle your personal data?

### When you visit our website

#### When you reach our website

We use session cookies based on our legitimate interest in ensuring a smooth and secure login process for our users.

The purpose of using session cookies is to facilitate the login process with the highest possible level of security.

No information about the user is stored in the session cookies. It only contains a code that enables the server to manage the login securely. You can read more about how we use cookies on our website in our Cookie policy.

#### To improve our services

We also use analytics and marketing cookies to fulfill our legitimate interest in developing and improving our products and services, as well as maintaining a good customer relationship with you.

These cookies collect information such as your IP address, previous use of our services, and any preferences.

Your personal data, is used to efficiently provide the services and support you expect from us, as well as to enhance and tailor our offerings to meet your needs and preferences.

#### When you chat with our customer service

When you chat with our customer service on the website, we process the personal data you choose to share with us based on our legitimate interest in managing and responding to your inquiries, issues, or complaints.

The personal data processed may include your name, personal identification number, contact details, and other information you provide to us in your chat messages. Therefore, make sure not to share any information you are not comfortable with us processing further.

The processing of your personal data includes logging cases handled by our customer service, investigating rental matters, and contacting you.

## **When you apply for Housing with Us**

### **When you join our Housing Queue**

We process your personal data when you register in our queue because we have a legitimate interest in securely managing our Customer's positions in the housing queue.

When you register in our queue, you provide personal data such as your name, address, date of birth/personal identification number, and contact details. Additionally, we collect information about your student union membership.

We process and store your personal data in our queue system and ensure your position is updated in relation to all other Customers.

### **When You Apply for an Exemption from Our Queue Rules**

When you apply for an exemption from our queue rules, i.e., request priority in the queue, we process your personal data as part of our intent to enter into an agreement with you. Any sensitive personal data requested in the application will only be processed after you have given your consent for such processing.

Personal data processed for an exemption application includes your name, contact details, and information about close relations. We may also process sensitive personal data, such as health-related information.

Your application and personal data will be forwarded to the Housing Delegation, which will assess your eligibility for an exemption.

### **When You Are Offered Housing with Us**

When you are offered housing with us, we process your personal data as part of our intent to enter into an agreement with you.

The processing of your personal data is necessary to verify your identity, confirm that you meet the conditions for renting housing with us, and to sign the rental agreement if you accept the housing offer.

We collect and process information related to your studies, such as your admission letter and student union membership. We also collect a copy of a valid photo ID.

Your personal data is used to verify that you are a student and a member of a student union in Stockholm by cross-checking the information against SSCO's register. We also review the personal data against Ladok's register to ensure that you will be studying during the time you are a Tenant with us.

## When you are a Tenant with Us

### During the Tenancy

We process your personal data when you have a rental agreement with us to fulfill our obligations as a landlord and contractual party under the agreement.

During the tenancy, we process your contact details, payment information, personal identification number, any free text you submit, and other information needed to verify your compliance with the agreement, such as details about student union membership and study results during study checks.

Your personal data is processed in connection with various matters related to the tenancy, such as administrative tasks, payment handling, communication with you as a tenant, checking study requirements and student union membership, managing disturbance cases, debt collection matters, and disclosure in response to potential authority decisions.

When you move out of the residence, we process your personal data to conduct an inspection of the residence and ensure it is in suitable condition for re-rental. Your name, personal identification number, and contact details will be recorded in the inspection protocol.

### Discounts on External Services

We process your personal data for marketing services from other companies based on our legitimate interest in enhancing your experience as a Tenant with us.

The purpose of this processing is to offer you relevant services and products from external companies that may be of interest to you as a Tenant.

We share the address of the residence you rent with our selected partners so you can receive exclusive discounts on their services for Tenants.

### When You Want to Sublet Your Residence

When you apply to sublet your residence, we process your personal data to fulfill our obligations and safeguard our rights under the rental agreement.

The purpose of this processing is to evaluate the subletting application and ensure that all necessary information is available to decide whether you may sublet in accordance with our procedures and guidelines.

Personal data used in this processing includes your name and contact details, your reasons for subletting, the subtenant's name and contact details, and proof of the subtenant's study results, registration certificate, and a copy of their ID.

When your subletting application is submitted to us, we review the provided information to ensure it meets our requirements and criteria for subletting. This includes evaluating the reasons for subletting and verifying the applicant's identity and study results.

## **When you apply for an Exemption from Our Housing Rules**

When you apply for an exemption from our housing rules, such as exceeding the maximum residency period or taking a gap semester, we process your personal data as part of our intent to enter into an agreement with you. In the application, we may request certain sensitive personal data, which will only be processed after you have provided consent.

Personal data processed for an exemption application includes your name and contact details. We may also process sensitive personal data, such as health-related information.

Your application and personal data will be forwarded to the Housing Delegation, which will assess your eligibility for an exemption.

## **Viewing of the Residence**

When the rental agreement has been terminated or has expired, a new Tenant will be moving into the residence you have been living in. It is in our legitimate interest to allow the prospective new Tenant to view the residence before moving in and receive information about it from the previous resident. For this reason, we may share your contact information in connection with the viewing. More information can be found on My Pages.

## **When the Tenancy is over**

After the contract period, we process your personal data because we still have a legitimate interest in administrating places in our housing queue in a safe way. In addition, there are legal requirements for us to process and store your data in, for example, our accounting.

The purpose of the processing is to delete or retain personal data in accordance with our guidelines and current legislation.

The personal data that is processed includes all the personal data that we have collected or provided by your time in the housing queue and during the tenancy, as well as in other respects.

The processing of personal data in this step includes deleting personal data, as well as possibly retaining certain data for specific purposes according to the company's routines and current legislation. This may mean that certain personal data is saved under a limited time to monitor claims or fulfill statutory requirements, while other personal data is deleted on an ongoing basis to ensure that only necessary data is stored.

If you still have a housing time left and choose to remain in the housing queue, we will continue to process your personal data in accordance with the section "When you join our housing queue".

If you choose to leave the queue after your residence period, we will delete all personal data, except for your personal identification number and your archived residence period. We do this based on our legitimate interest in ensuring that all of our customers meet our accommodation requirements and certain statistical purposes.

## When you apply for a position with us

### When recruiting employees

The processing of your personal data when you apply for a position on our career pages takes place with the support of our legitimate interest in conducting recruitment activities and handling for vacant positions at Stockholms Studentbostäder.

The purpose of processing your personal data is to carry out the recruitment process and fulfill our recruitment needs.

The personal data that is processed includes contact details, CV, cover letter, certification, results from any tests and notes from interviews, reference taking and possible background checks.

The processing of personal data includes registering, saving and assessing application documents. Personal data can also be processed by our external partners, for example recruitment companies and IT companies that manage systems and authorizations.

After completion of the recruitment process, the application documents are deleted within two years.

### In case of spontaneous application

The processing of your personal data when you make a spontaneous application on your career pages takes place with the support of the consent that you need to give before submitting the application.

The personal data that is processed includes name, contact details, CV, cover letter, certification, grades, and other personal data that you share in your application. We process your personal data to administer your spontaneous application. The processing includes registering and saving your data in our candidate register, so that we can contact you when a position opens up with us.

## Other treatments

### When you contact us

When you choose to contact us, either through social media, phone calls, e-mail our function mailboxes, or on site at our reception, we process the personal data that you choose to share with us based on our legitimate interest in handling and answering your questions, matters or complaints.

The personal data that is processed may include contact details and other information that you provide to us in connection with your communication.

The processing of your personal data includes logging of cases by our customer service, investigating rental conditions, and contacting you.

## **Sending information and customer surveys**

During your time as a customer and tenant with us, we will in some cases send out information that we think may be good for you to know about. We do this based on our legitimate interest in keeping our customers up-to-date on current news and events at Stockholms Studentbostäder.

We process your contact details in order to send out information and surveys to you as a customer.

## **When you participate in our competitions**

When you participate in one of our competitions, we process your personal data based on our legitimate interest in checking that the competitions are run correctly.

We collect and process personal data such as your name, username, contact details, and other personal data that you share with us in your contribution to the competition.

We process your personal data in order to register your participation in the competition, assess your contribution in the competition, and to be able to contact you if you become one of the winners. The data is also used to ensure that the competition participants meet the criteria set out in our competition rules. The winners' names, usernames and competition entries are published on Stockholms Studentbostäders social media and website [sssb.se](https://www.ssb.se).

# **Integrity and security**

## **What do you do to keep my personal data safe?**

We at Stockholm Studentbostäder protect the security of the processing of your personal data and strive for your personal data to be handled with a high level of security and confidentiality.

We have therefore taken technical and organizational measures to protect your personal data from loss, destruction, misuse, and unauthorized access or disclosure.

The security measures we have taken include, among other things, the implementation of multi-factor authentication (MFA), as well as personal login for our employees and suppliers so that only authorized persons can access your personal data. We regularly review our security policies and processes to ensure that our systems are secure and protected.

## **How is my personal information shared?**

In some cases, we may share your personal data with third parties, for example with our suppliers and partners, or with authorities when they request them.

When required based on the GDPR, we enter into a personal data processor agreement with the respective personal data processor in order to ensure that the processor only uses your personal data accordance with our instructions.

Below are some examples of third parties with whom we may share your personal data.

- System providers in the storage and analysis of data.
- Authorities in case of authority decisions.
- The housing delegation for applications for exemptions.
- Social media platforms when you enter our competitions.
- Our partners within the framework of our collaboration.

## Where is my personal data processed?

We aim to process personal data only within the EU and EEA. If transfers of personal data outside the EU/EEA become necessary, we ensure that the contractual terms are in line with applicable legislation, recommendations, and practice from EU and national authorities. We also come before any sharing of personal data outside the EU/EEA ensure that appropriate safeguards are in place that provide adequate levels of protection from your personal data.

## Your rights

### Right to be informed

You have the right to receive information from us when we process your personal data in connection with the collection or otherwise when you, as a registered user, request information. The information that is provided to you must, among other things, contain information about the purposes for which personal data will be processed, the legal basis for the processing, storage time, who will have access to the personal data, how it is shared (if relevant), how you can file a complaint, etc. (read more below or at [imy.se](https://imy.se)).

### The right to access your personal data and register extracts

You have the right to contact us to find out if and how your personal data is processed within Stockholms Studentbostäder. If your personal data is processed by us, you have the right to receive a copy of the data (with certain exceptions) and information with more detailed information about how your personal data is handled by us (in a so-called register extract).

### Right to have your information deleted (right to be forgotten)

In some cases, you have the right to request that your personal data be deleted completely. Certain exceptions exist when we cannot comply with such a request, for example if we have a legal obligation to save the data. If you wish to make such a request, we will make a special assessment for the processing of personal data in your case and justify whether we cannot possibly delete any information.

### Right to rectification

You have the right to have incorrect or incomplete information about you updated. You can also correct the information you register on My pages yourself.

### Right to limitation of treatment

You have the right at any time to object to your personal data being used for direct marketing (newsletter and the like). You also have the right to object to your personal data being processed when the legal basis for the processing is also a balancing of interests.

If you wish to make such an objection, we will make a special assessment based on your interest in relation to our interest in processing your personal data for the specific purpose.



## Exercise your rights

Do you wish to exercise any of your rights? You are always welcome to contact us for help or more information. Stockholms Studentbostäder handles all requests regarding rights in a prompt and legal manner. You can either post your request to our address:

Stockholms Studentbostäder  
Box 19608  
104 32 Stockholm

or contact us via our contact form on our website.

## Leave a complaint

You also have the right to complain about how we process your personal data to us and to the supervisory authority Integritetsskyddsmyndigheten (IMY), if you think that we do not process your personal data in accordance with the Data Protection Regulation.

Telephone: 08-657 61 00  
E-mail: [imy@imy.se](mailto:imy@imy.se)

If you want to read more about your rights, you can do so on IMY's website.

## Tables

The tables below contain more detailed information about how we mainly process personal data from you in the various stages of your customer journey with us, the purpose and the legal basis for the respective processing, as well as how long we save the personal data after processing.

### When you visit our website

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL GROUND ACCORDING TO GDPR	HOW LONG DO WE STORE YOUR PERSONAL DATA?
Improve and market our services	IP-address	Legitimate purpose	Up to 12 months from collection
Provide service and answer Visitor's questions	Chat history	Legitimate purpose	Continuously removed

## When you apply for housing with us

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL GROUND ACCORDING TO GDPR	HOW LONG DO WE STORE YOUR PERSONAL DATA?
Ensure that all Customers comply with our queuing rules	Customer's account for the housing queue and all associated personal data	Legitimate purpose	Until the request to be deleted as a Customer
Assess the application for exemption from our queuing rules	Health information and other reasons provided by the Customer as a basis for exemption	Consent	Up to 12 months after notification of the need for additional information or the decision on the application

## When you are a Tenant with us

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL GROUND ACCORDING TO GDPR	HOW LONG DO WE STORE YOUR PERSONAL DATA?
Administer the tenancy relationship	Identification details, contact information, scope of studies, student union membership, payment details	Fulfillment of the agreement	Up to 10 years after the tenancy relationship
Handle disturbance cases, debt collection matters, and comply with authority decisions	Name, contact details, and any other personal data relevant to the case.	Fulfillment of legal obligations.	Up to 12 months from the end of the tenancy relationship
Provide our tenants with discounts on external services	Address	Legitimate interest	During the tenancy relationship
Enable subletting of the residence	Tenant: Name, contact details, reasons for subletting  Subtenant: Name, contact	Legitimate interest	Up to 3 months after the subletting period has ended

	details, proof of study results, registration certificate, copy of identification		
Provide the prospective tenant with the opportunity to view the apartment before moving in	Contact information	Legitimate interest	Until the prospective tenant's acceptance or rejection of the housing offer

### When the Tenancy relationship is over

PURPOSE	PERSONAL DATA	LEGAL GROUND ACCORDING TO GDPR	HOW LONG DO WE STORE THE DATA?
Ensure compliance with queue rules	Personal identification number, information about the achieved residency duration	Legitimate interest	Until you turn 51 years old

### When you apply for a position with us

PURPOSE	PERSONAL DATA	LEGAL GROUND ACCORDING TO GDPR	HOW LONG DO WE STORE THE DATA?
Recruiting employees	Name, contact information, CV, cover letter, certificate, grades, results from possible tests, possible background check, notes from interviews and reference admission	Legitimate interest	Until you turn 51 years old
Spontaneous application	Name, contact information, CV, cover letter, certificate, grades, other personal data that has been shared in your application	Consent	Up to 2 years after completed recruitment process
Reference check	Reference's name, e-mail, phone number, title, company, relation to the candidate	Legitimate interest	2 weeks after completed recruitment process

## Other treatments

<b>PURPOSE</b>	<b>CATEGORIES OF PERSONAL DATA</b>	<b>CATEGORIES OF PERSONAL DATA</b>	<b>HOW LONG DO WE STORE YOUR PERSONAL DATA?</b>
Customer contact	Contact information and other information that is shared in your communication	Legitimate interest	As long as the information is necessary in our contact with you
Competition	Name, username, contact information, other personal data shared in the competition	Legitimate interest	As long as the information is necessary for our marketing