

## Privacy policy for tenants

At North-East Vestagervej 17 ApS and North-East Svanemøllevej 16 ApS ("**North-East**", "**us**" or "**we**"), data protection and confidentiality is a high priority. This privacy policy (the "**Privacy Policy**") sets out clear guidelines for how North-East processes your Personal Data as a (future) tenant.

We urge you to read this policy before transferring Personal Data (as defined below) to North-East as landlords.

### 1. Collection of Personal Data

At North-East, we process ("**Process/Processing**") personal data about you ("**Personal Data**") as a (future) tenant of ours at one of our properties (each a "**Property**").

The following types of Personal Data may be subject to Processing by us:

- a) Name.
- b) Address.
- c) E-mail.
- d) Bank account and payment information.
- e) Heat and water consumption, other information about consumption.
- f) Lease period.
- g) Other ad hoc. information about your rent account.
- h) Credit card information.

We will Process the above Personal Data in the following situations/for the below purposes:

- a) When you apply for tenancy with us.
- b) When you enter into a lease agreement with us.
- c) When you contact us per e-mail, phone or physical letter.
- d) When your tenancy is terminated.
- e) Administration of your tenancy (incl. daily administration, complaints, etc.).
- f) For the establishment, exercise or defense of a legal claim (e.g. dispute with rent control board and debt collection cases).

- g) To comply with legal requirements and legal obligations.
- h) To comply with terms of your lease agreement, including collection of rent/consumption.
- i) To monitor the Property as video surveillance will be set up in accordance with the rules of the Danish TV-Surveillance Act (in Danish: *tv-overvågningsloven*).
- j) In connection with a (potential) sale of one or more of the Properties.

## 2. Legal basis of processing

North-East will base the Processing of your Personal Data (as described above) on the following legal bases:

- a) To fulfil the lease agreement (including provision of services related to your tenancy and enforcement of the terms of the lease agreement), cf. article 6 (1)(b) of the GDPR.
- b) To comply with our legal obligations as landlords, cf. article 6 (1)(c) of the GDPR.
- c) To pursue our legitimate interests as landlords to establish, exercise or defend legal claims, cf. article 6 (1)(f) of the GDPR for non-sensitive data and for sensitive personal data, cf. article 9 (2)(f) of the GDPR.
- d) To pursue our legitimate interests as landlords to monitor the premises, maintain order and communicate with you, cf. article 6(1)(f) of the GDPR.
- e) To pursue our legitimate interest as landlords in being able to send out service messages, cf. article 6(1)(f) of the GDPR.
- f) To pursue our legitimate interest as landlords in being able to send out customer satisfaction surveys, cf. article 6(1)(f) of the GDPR.
- g) Other legitimate purposes.

## 3. Transfer of Personal Data

For the above purposes, we may in some circumstances share your Personal Data with third parties. North-East may thus use external service providers, including suppliers of IT services, invoicing services, rent collection as well as other service providers for the provision of services related to your tenancy and the enforcement of the terms of your lease agreement. All such service providers are/will be subject to a data processing agreement.

In some cases, your Personal Data will be disclosed to the following independent data controllers:

- a) Potential buyers of the Properties.
- b) Utility companies.
- c) Accountants.
- d) Lawyers.
- e) Public authorities.
- f) Courts.
- g) Debt collection companies.

The transfer of your Personal Data will in this instance be made pursuant to either your lease agreement, cf. article 6 (1)(b) of the GDPR or based on our legitimate interest, cf. article 6 (1)(f) of the GDPR, depending on which of the purposes listed above we will be pursuing. Furthermore, your Personal Data may be disclosed to our business partners who provide services to North-East.

If relevant, Personal Data may be shared with other entities within the North-East Group of which North-East are members. Please be informed that all Processing of Personal Data among companies of the North-East Group is subject to an Intra-Group Data Processing and Transfer Agreement, which ensures compliance with the GDPR and associated national regulation such as acts, regulations, rules, general advice and practice.

#### **4. Transfer of Personal Data to third countries**

To the extent Personal Data is transferred to data controllers or data processors in countries outside the EU/EEA, including members of the North-East Group in such countries, that do not automatically ensure an adequate level of data protection, such transfer will be based on the EU Commission's standard contractual clauses.

#### **5. Video surveillance**

North-East has installed video surveillance in certain targeted areas at the Properties at Vestagervej 17, 2900 Hellerup, Denmark, and Svanemøllevej 16, 2100 Copenhagen Ø, Denmark, including the garden, parking and entrances areas. The purpose of the video surveillance is to ensure safety and prevent crimes in accordance with article 6(1)(f) of the GDPR and Section 8(3) of the Danish Data Protection Act (in Danish: *databeskyttelsesloven*).

With the exception of video surveillances at the entrance and the parking areas that can be watched/accessed by a small number of selected employees within North-East, the video recordings may only be accessed and reviewed in the event of suspected criminal behavior, suspected violation of North-East's internal guidelines or in case of internal/external auditing. The recordings may be disclosed to Danish or international police for criminal investigations if the recordings are disclosed for the purpose of safeguarding public or private interests which clearly override the interests of secrecy in accordance with Section 8(4) of the Danish Data Protection Act or if the disclosure is otherwise required by law. Should it be necessary



to disclose the recordings for other purposes than mentioned, the prior consent of the subjects of such recordings will be obtained before disclosing the recording.

The video recordings are stored on a server that only a limited number of employees within the North-East Group have access to and can only be accessed with a password.

Video recordings which have been recorded for the purposes of preventing crime will be deleted or anonymized no later than 30 days after the recording has taken place, unless it is necessary for North-East to keep the recordings for the purpose of solving a breach of law.

## **6. Retention of Personal Data**

North-East will delete your Personal Data when we no longer need to Process such Personal Data for one or more of the purposes set out above.

Personal Data covered by the Danish Bookkeeping Act (in Danish: *bogføringsloven*) will be kept for five years after the end of the financial year, to which such Personal Data relates. Other Personal Data Processed as part of your tenancy with North-East will as a main rule be deleted five years after termination of the lease agreement. However, in some cases Personal Data may be stored for more than five years if we are legally required to or need to store such personal Data in order to defend or establish legal claims. Furthermore, Personal Data may be stored for a longer period in anonymized form.

## **7. Security**

We have implemented security measures to protect your Personal Data to the furthest extent possible. This includes the use of encryption, pseudonymization (where possible), access restriction etc.

## **8. Rights of data subjects**

Subject to certain statutory exceptions, you have the right to access your Personal Data being Processed by North-East. Furthermore, you have the right to object to the Processing of such Personal Data (and request the restriction thereof) and request rectification (including completion or deletion) thereof to the extent it is incomplete or incorrect. Under certain circumstances, you may also request that North-East provide you with a copy of such Personal Data in a structured, commonly used, and machine-readable format and request North-East to transfer such Personal Data to another data controller of your choosing.

## **9. Data controllers, contacts and complaints**

The entity in charge of Processing your Personal Data (the data controller) is the landlord as stated in your lease agreement (or any future landlord following a transfer of the Property), i.e.:

North-East Vestagervej 17 ApS  
Vestagervej 17  
2900 Hellerup  
Danish business registration (CVR) no. 36989548  
E-mail: [Legal@nefo.com](mailto:Legal@nefo.com)

or



North-East Svanemøllevej 16 ApS  
Vestagervej 17  
2900 Hellerup  
Danish business registration (CVR) no. 37257273  
E-mail: [Legal@nefo.com](mailto:Legal@nefo.com)

If you wish to exercise any of your rights, as described herein, if you have any questions regarding this Privacy Policy or the Processing of your Personal Data or you wish to make a complaint you can [reach](#) out to the data controller as set out above. You are also entitled to file a complaint with the Danish Data Protection Agency (in Danish: *Datatilsynet*), Carl Jacobsens Vej 35, 2500 Valby, telephone number +45 33 19 32 00, e-mail [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk).

