

Qasa Privacy Policy

➡Löydät tietosuojaselosteen suomeksi <u>täältä</u>. ➡Du finner personvernerklæringen på norsk <u>her</u>.

Qasa AB (Qasa) is responsible for the processing of your personal data in the Qasa marketplaces in the Nordics, including qasa.com. Qasa is also the data controller for all Qasa-managed rental agreements in all markets together with its local entities: Qasa Oy in Finland and Qasa AS in Norway.

Qasa is part of Vend Group and Qasa advertisements are also available at Vend Marketplaces such as Oikotie in Finland and FINN in Norway. See how personal data is being processed at Vend <u>here</u>.

We ensure that your personal data is protected, and that the processing complies with the applicable regulations and data protection rules, our internal guidelines and procedures. Users also have the option to refuse certain activities. Please visit the settings in your user account.

In this privacy policy we cover how we process personal data whether you are a landlord or a tenant, or applying to any of the listings available at our marketplaces. If you are a guarantor, a co-applicant or our business contact person, the same principles apply to you as well.

Full details of the controller:

Qasa AB, org. No. 556966-3734 Folkungagatan 44, 118 26 Stockholm, Sweden. info@qasa.com

What information do we process about you?

Data type	Description	Source
Basic profile data	E.g. name, address, contact details, date of birth, social security number, gender	User



		-
	and other profile data you have provided.	
Account use data	Account activity and subscriptions to services, privacy settings, support queries, account security data (e.g. passwords), biometrical data	User
Financial, transaction and credit information		
Information on your work and studies	Eg. employment status, work place, form and scope of studies	User Public resources
		Third-party services
Living preferences	Preferences include information e.g. whether you smoke, have pets or need special assistance amenities in the apartment you wish to rent. Note that the data you choose to put in may include sensitive data (e.g. information concerning your health).	User
Technical information on the use of service	IP address, browser type, operating system and device etc. as well as information about how users navigate to, on and from our website.	
User identity data	Information on the user's identity from identity verification services	Third-party services
User generated content	Your personal profile and advertisements, viewings and messages between landlords and tenants , feedback through user surveys.	User
	User data includes the data you choose to put in, and it might include sensitive data	



	(e.g. information on sexual orientation or religious beliefs).	
Lease and transaction information	E.g. rental history and details, payments due and received, methods of payment and invoices	User Third-party services
Information received from third parties	E.g. tips, requests, notices and other feedback we receive from other users or third parties related to marketplaces services.	Third-parties
Behavioural data on the platform	Types of homes for which You have shown interest, functions used, how long and when you last used the service	User
Inferred data about users	Predicted interests and user preferences, likely locations, likely demographics. Predicted data is based on the user's basic profile data and behavioural information collected over time.	User
Location data	GPS data and IP address as associated to location data	User and user's device. Third party services
B2B Client details	For our corporate customers and our contact points within their businesses, we collected business role, related contract details, contact details	
Compliance data	We collect data from information service providers to comply with our legal obligations to achieve and ensure sufficient customer knowledge, carry out controls against sanction lists and fulfil our obligations to report the correct information about landlords to the Tax Agency.	Third-party services Public resources
Customer service data	All data included in the context of our customer service, including phone call recordings, correspondence and chat logs.	User
Cookies and other locally stored data	When you use the Services, we use various tools to try to recognize you and	User device



learn more about you as a user. For example, we use cookies to analyse how you use Qasa. Cookies also mean that you do not have to log in every time you visit our website. See more about our use of cookies and local storage of data in our cookie policy below..

What do we process your information for?

We use the information we collect about you and other users who use our marketplaces to provide and improve our services. Here it is described for which purposes Qasa processes personal data.

To accomplish certain purposes, we use machine learning and train algorithmic models to predict different outcomes as well as to make certain decisions using historical information. In the cases the information used to train algorithmic models contains personal data are these de-identified or pseudonymised.

Purpose of processing	Description	Legal basis	
Advertise rental apartments and search of housing ads	Qasa gives you access to a marketplace where you can advertise and search for, among other things, housing, create a user account, connect with landlords and tenants and book viewings; and enter into a lease agreement. In order to deliver these services to you, we need to process your personal data.		of
Rental agreement management	To create safe and reliable rental relationships, Qasa offers more than just a flexible marketplace – for example, by handling rent payments and security deposits, providing rental insurance, issuing guarantees, and supporting you throughout the rental period. When you choose to enter into a rental agreement through Qasa, Qasa AB shares your personal data with Qasa Oy in Finland and Qasa AS in Norway, which is responsible for providing the services related to your rental	Fulfilment agreement	of



	agreement. In Norway we deliver our rental agreement management service in cooperation with Keyhole ApS and its partners which assist us in providing services related to rent payment and rent guarantee.		
Qasa messaging service to provide communications between users	Qasa's messaging service offers you a secure way to communicate with other users at Qasa marketplace. We process your personal data when you use the messaging service. Messages are automatically filtered so that they should not contain illegal or offensive content and can also be reviewed manually. It might also be necessary to prevent or investigate misuse of the service.	Fulfilment agreement	of
Automated decision-making including profiling	Knowing you better equals a better-functioning marketplace. In order for us to offer you a smooth experience, we tailor our content based on your profile and inferred data. In addition, income and credit check results may indicate whether you fulfill the requirements of the landlord for a home shown in our marketplace, or may give you an advantage in applying for a home.	-	
Providing a safe and secure marketplace	It is very important to us to ensure that Qasa is a safe and secure marketplace. Therefore, we do what we can to detect, prevent and remove fake user accounts and housing, and other forms of misuse of the service or actions contrary to our terms and conditions. We process all data we have collected about our users for this purpose.		of
ID verification	To provide a reliable and secure experience throughout the Qasa marketplace we can process information about your identity, for example by allowing you to verify yourself with BankID, Onfido or by sending in a copy of your ID document. We may also request proof that you own/rent the home you advertise.	Fulfilment agreement	of
Offer additional services to the lease	Information about you and your new home may also be shared to third parties to offer you	Legitimate interest	



	services related to your move and new home, for example home insurance, electricity or broadband.	
Provide you with relevant tips, news and offers	We want you to have the best experience possible when using Qasa. We can customise how we communicate with you based on what you like and what we think is relevant to you. We also want to understand how you found us and if you enter an advertisement or apply to rent a home. We also send out tips and news to you such as newsletters by email based on how you use Qasa. Our emails may contain pixels or similar technologies to understand if our communications reach you. You can always refuse direct marketing via your user account, via link in the emails or by contacting us.	interest
Marketing	We want to be able to market our services to people we believe are interested in them. That's why we use third-party services to create relevant target groups for our marketing. The processing that takes place when we share personal data with Google, Facebook and Adroll in order to market Qasa's services is based on your consent. You can revoke your consent at any time via your user account. We obtain your consent for each device and browser you use. Therefore, you can have different settings in different places. Learn more in our cookie policy below.	Consent
Customer support	If you are in contact with Qasa's customer support, we process your personal data for the purpose of helping you with your questions and concerns.	
Making things work	We record and analyse how you and others use	Legitimate



better	our services so that we can understand how we can make Qasa as good as possible, and what functions our users appreciate. These activities are important for Qasa's continued development and product improvement and so that we can adapt our service to how you and other users want Qasa to work. We use the information collected about you when you participate in voluntary surveys or research projects to improve our products and services.	interest
Research and development of housing market	Qasa supports research and development projects and contributes data and insights from our services. In these cases, we provide this information in a non-identifiable format.	Legitimate interest
Data sharing with Vend	In order for us to provide our customers with wide reach for their advertisements we share ad data with Vend Group services Oikotie in Finland and FINN in Norway. We also have reporting duties to our owner Vend, and the reporting data we share to the owner may include personal data.	Fulfilment of agreement.
Fulfilling statutory obligations	We process personal data to fulfil our statutory obligations. We make this happen in order for example to ensure that we obtain sufficient customer knowledge, retain data for accounting purposes, report information on transactions to the applicable tax authorities and by disclosing information to authorities if we are required to do so by law.	Legal obligation

Where do we process your personal data?

We always aim for your personal data to be processed within the EU/EEA and our own IT systems are available within the EU/EEA.

Transfer to suppliers in third countries

Some of our suppliers have all or parts of their operations in countries outside the EU/EEA (such countries are called "third countries"). Regardless of the country in which your personal data is processed we take all reasonable legal, technical and organisational measures to ensure that the level of protection is the same as within the EU/EEA. We ensure that the



supplier enters into an agreement with us where they undertake to comply with the regulations approved by the European Commission regarding protection of personal integrity.

Your rights

You have the right to know what we do with your personal data. You also have the right to access your personal data and in some cases have it corrected, deleted or blocked. Below we list what rights you have and how to use them.

Get access to your personal data

We are always open and transparent with what information we have about you. If you have one user account at Qasa, you can log in at any time to get an overview of which information that is registered about you there, for example which contact details we have for you, your references and your current and previous applications.

If you want to get a more detailed insight into which personal data we process about you, you can request access to this data (in a so-called register extract). You can request one such registry extract by contacting support. Because we have a duty to protect your personal data from unauthorised access, we will only disclose such data as we know for sure belongs to you.

Delete data

In some cases, you have the right to have your personal data deleted, e.g. if the personal data are no longer necessary for the purposes for which they were collected. In such cases, we will delete the information we have about you, but with some important exceptions. We will keep such information that we must retain by law (for example for accounting purposes and to complete reporting to the tax authorites). If we have reason to believe that you have used Qasa i contrary to our terms and conditions, we reserve the right to keep your data in quarantine for two years after your request for erasure. The data is used during this period solely for the purpose to detect and prevent misuse of our services. You can request the deletion of your personal data by contacting Qasa customer support.

Request correction of personal data

If you believe that information about you is incorrect or incomplete, you have the right to request that the task is corrected or supplemented. If you have a user account, you can update yourself with certain information about you by logging into your user account and changing your account settings. If your request for correction concerns other data, please contact us.

Say no to direct marketing

You can at any time say no to such processing of personal data that Qasa does for direct marketing, for example sending by email. You can unregister by clicking on a link in the mailing, contact customer support or via your user account.



Object to processing based on our legitimate interest

You have the right to object to the processing of your personal data that we do with the support of our legitimate interest. If you object to such processing, we can only continue with it if we can demonstrate that there are compelling legitimate reasons for the personal data to be treated as outweighing your interests.

If you object to certain processing of personal data, there are several factors that we would consider, for example, your reasonable expectations and the pros and cons of the treatment means to you, Qasa, other users and any third parties. You can see which processing is based on our legitimate interest under the heading "What do we process your information for".

Limit processing of data

You have the right to request that our processing of your personal data be restricted. If you request that the processing of your data is to be limited may, however, mean that we cannot fulfill our possible obligations towards you during the time the processing is restricted.

Data portability

Finally, you have the right to receive a copy of your personal data in a structured format (data portability). The right to data portability only covers data that you have provided yourself us and with whom we process to fulfill an agreement with you or with the support of your consent.

Object to automated decisions

You always have the right to object to a decision made completely automatically, you do this by contacting us at info@qasa.com. One of our employees will then check your errand.

Contact us regarding your rights

If you want to exercise any of your rights, you can request access to or deletion your personal data by contacting our customer support. You can reach us by email info@qasa.com or visit our customer support page.

Contact supervisory authority

If you believe that Qasa handles personal data incorrectly, you can lodge a complaint to the data protection supervisory authority.

EIn Sweden, Integritetsskyddsmydigheten (<u>www.imy.se</u>) is the authority responsible for monitoring the application of the personal data legislation. We consider IMY as our lead supervisory authority.

EIn Finland, you can contact Tietosuojavaltuutetun toimisto (<u>www.tietosuoja.fi</u>).

III Norway, you can contact Datatilsynet (<u>www.datatilsynet.no</u>).

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To whom can personal data be disclosed?

Personal data processed through qasa.com is processed within the Qasa Group: Qasa AB in Sweden, Qasa Oy in Finland and Qasa AS in Norway. In Norway, to manage rental agreements, data is shared also with Keyhole ApS ands its partners.

In addition to the lease contract parties, we share information about you with certain third parties, for example suppliers who process personal data on our behalf, authorities and partners. Here you can read more about who we disclose personal data to.

Qasa AB is part of Vend Marketplaces and personal data may be shared within the Vend Group.

Suppliers who process personal data on our behalf

We sometimes need to hire suppliers to deliver our services to you. Such suppliers can, for example, deliver systems for sending emails and push notifications, cloud services for data storage or analysis tools. We are then still responsible for the processing of your personal data by the subcontractor. The suppliers may not use the data for purposes other than those that we specify. We share personal data with suppliers because it is necessary to fulfil our agreement with you.

Agencies

We disclose personal data to authorities, such as the police and the tax authorities, at the authority's request if we are obliged to do so by law or authority decision or to law enforcement authorities to contribute to an ongoing criminal investigation. When we share personal data with authorities, it is either because we have a legal obligation to do so or because we have a legitimate interest in contributing to an ongoing criminal investigation.

Collaborators who offer services to Qasa's users

If you choose to take part in ancillary services we provide together with partners, for example or signing home related services such as broadband or electricity, we can share personal data with our partners so that they can perform their services. We enter into agreements to ensure that such collaboration partners process data in accordance with current personal data legislation. We share information with these partners because it is necessary to fulfil our agreement with you.

Debt collection company

If Qasa has a claim against you, we may share the personal data necessary with collection agencies to establish, enforce and exercise our legal claim.

Research and educational institutions

On certain occasions, we share de-identified information with research and educational institutions in order to contribute to socially beneficial Swedish and international research.



Before we share information for research purposes, we always make an assessment of the social benefit of the research and condition the sharing with strict instructions on when the information must be deleted.

Advertisers and Advertising Networks

We may also share information about you with advertisers and advertising networks that use the data to select and display relevant advertisements to you. However, we do not sell marketing lists to third parties for their marketing purposes.

Other recipients with whom we may share information

If you send messages to advertisers, we share the personal data you provide in messages with the person you contact. If the person you are communicating with is a company, the recipient becomes the personal data controller for the personal data that your messages may contain. When you apply for a first home or as a tenant sign a tenancy agreement, we will share your personal data with credit reporting companies to obtain a credit report on you. We share information with these recipients because it is necessary to fulfil our contract with you.

We will not share, sell, transfer or otherwise disclose personal information beyond what is set out in this privacy policy unless we are required to do so as a result of legal obligation or if we have obtained your consent first.

What are cookies, pixel cookies and similar technologies?

Like most internet-based service providers, we use technologies that are essentially small data files placed on your computer, tablet or mobile phone (a "Device") that allow us to store certain information each time you visit or interact with our website.

The specific names and types of cookies, pixel cookies and other similar technologies that we use may change from time to time. For more information about cookies and similar technologies in general, see allaboutcookies.org.

To help you better understand our cookie policy and our use of such technologies, we have created this brief overview of terminologies and definitions:

Cookies: small text files (typically made of letters and numbers) which are placed in the memory of your browser or device when you visit a website or view a message. Cookies enable a website to recognise a specific device or browser. There are several types of cookies:

Temporary cookies expire when you stop using the browser and allow us to remember your actions during the period you use your browser.

Persistent cookies are stored on your device and allow us to remember your preferences or actions across multiple websites.

First-party cookies are set by the website you visit (qasa.com).



"Third-party cookies" are set by a third-party website that is separate from the website you are visiting (our partners).

Cookies can be disabled or removed using tools available on most browsers. The different browsers offer different options to disable the possibility of storing cookies.

Pixel cookies: small graphic images (also known as "pixel tags" or "clear GIFs") that may be included on vend.com. Pixel cookies can be used for a number of purposes, including to measure the effectiveness of our website, to monitor how many visitors are on our website and how they navigate our website.

Similar technologies for storing information: technologies that store information in your browser or device and that utilise local devices and local storage, such as flash cookies, HTML 5 cookies and other methods. These technologies can operate across all of your browsers. In some cases, the use of these technologies cannot be controlled by the browser, but requires special tools. We may use these technologies to store information to detect irregularities in website usage or to evaluate the performance of our website.

We may use the terms "cookies" or "similar technologies" interchangeably in our cookie information to refer to any technology that we may use to store data on your browser or device or to collect information that helps us identify you, as detailed above.

Your choices and our use of cookies and similar technologies

We offer on our website, qasa.com, certain functions and tools that are only available if we use the technologies mentioned above. We obtain consent for cookies when you as a user visit our website for the first time. Once you have given your consent, you can change your preferences under cookie settings at any time. Cookies and similar technologies can often also be blocked in the browser settings or on your mobile platform. If tracking is disabled in the browser, this may mean that some features of our website cannot be used.

You find more detailed information in the Data Subject Rights section on how to make use of your rights, including controlling use of cookies.

The use of the technologies listed above fall into the following general categories

- Strictly necessary: We may use cookies or other similar technologies that are necessary for the operation of our website. This includes technologies that allow you to access our website and that are necessary to avoid unauthorised use of it and improve security;
- Analytics and product development: We may use cookies or other similar technologies that are useful to assess the performance of our website, including as part of our analytical work to help us understand how our visitors use our website or to to improve the content;
- 3. Marketing: We may use cookies, pixel cookies or other similar technologies to customise marketing in various channels such as email, Meta Platforms (Facebook) and Google based on your interests and use of our website.



Contact for questions

Contact us

We work continuously to ensure that the processing of your data takes place in a legal manner. You can always contact us by emailing info@qasa.com or via our customer support pages.

Updates to this policy

If we make changes to this privacy policy, we will post an updated version on the Qasa website.