Privacy Statement
Processing of Personal Data of Customers and Stakeholders

Last updated: 22 September 2026

This privacy statement applies to Are Oy's ("Are") customers, suppliers, partners, website visitors and other third parties, such as potential customers. In this privacy policy, we explain how we process your personal data in connection with our services or marketing activities when you visit our website or when you otherwise interact with us in relation to our business operations.

1. Data controller and contact details

Name: Are Oy (company registration number: 0989493-6)
Kaivokselantie 9
01610 Vantaa
Email: gdpr@are.fi
Tel. 020 530 5500 (switchboard 8 am–4 pm)

2. What data do we process, and what are the purposes and legal bases for processing?

We process data relating to customers, potential customers and other stakeholders, such as suppliers, property or contract contact persons, property managers, owners or other persons relevant to the performance of our work. The table below sets out the personal data we process, the purposes of processing and the legal bases.

TYPES OF PERSONAL DATA	PURPOSE OF PROCESSING	LEGAL BASIS
Basic data of the data subject* such as name, date of birth, customer number, personal identification number, user ID and/or other unique identifier, password and language of communication ***The data subject's contact details****, such as email address, telephone number and postal address; ***Information relating to the company and its contact persons,*** such as the names, titles and contact details of contact persons	The provision, organisation and development of our services	Performance of a contract Our legitimate interest based on the customer relationship or other similar relevant connection
	Assessing creditworthiness in connection with an order	Performance of the contract
	Fulfilment of our contractual and other commitments and obligations	Performance of the contract
	Managing our customer relationships, including organising meetings and managing visitor data in	Our legitimate interest based on a customer relationship or other similar relevant connection

	connection with these, organising events, and sending out customer satisfaction surveys	
Consents and opt-outs regarding direct marketing	Electronic direct marketing (including electronic surveys)	Consent (individuals) or legitimate interest (business representative)
Information contained in call recordings, such as name and details relating to the management of the customer relationship or an order, the caller's number and the time of the call	Calls are recorded to verify work orders, improve customer service and ensure quality, and to investigate any complaints	Our legitimate interest in ensuring and improving the quality of customer service, verifying work orders and investigating complaints
Personal data collected in connection with events, such as event registration, special dietary requirements and billing details	Organising events	Our legitimate interest based on a customer relationship or other similar relevant connection
		Consent
Information relating to the customer relationship and contracts, such as details of past and current contracts and assignments, communications with the data subject and other contact-related information, and billing details	Fulfilment of our contractual and other commitments	Performance of the contract
	Managing and maintaining the customer relationship	Our legitimate interest based on a customer relationship or other similar relevant connection
Sanctions checks based on the name of the company, its owner, representative or other responsible person; the report may also contain the following information: address details (including email), gender, nationality, date and place of birth, personal identification number, and additional information such as position within the company	The statutory basis is to ensure compliance with the sanctions imposed in business operations	The legal basis is to comply with sanctions imposed by the authorities of the EU, the UN, the United States and the United Kingdom.
Information regarding the technical connection and the device you are using, such as your IP address, device ID or other identifying information, as well as cookies	Behavioural analysis, profiling	Consent

Providing personal data marked with an asterisk (*) is a prerequisite for the establishment of our contractual relationship and/or customer relationship. Without the necessary personal data, we cannot supply the product and/or service.

3. Where do we obtain data from?

As a general rule, you yourself are the source of the data stored. Other sources of data are used within the limits laid down by law. These may include, for example, information relating to assignments provided by the client of property maintenance and contracting services.

In addition, information about users is obtained from data collected when access rights are created and entered into the data controller's systems, as well as from data collected from users' devices during use.

Furthermore, personal data may be collected and updated for the purposes described in this privacy notice from publicly available sources, from contact information service providers and public authorities, or on the basis of information obtained from other third parties, within the limits of applicable legislation. Such updates to data are carried out manually or by automated means.

4. To whom do we disclose and transfer data?

We may disclose personal data, within the limits permitted and required by applicable legislation, for example to legal and financial or other similar advisers and debt collection agencies, which act as independent data controllers in respect of the data. Personal data may also be disclosed to public authorities which have a legal right to obtain information from the processed personal data.

We use subcontractors operating on our behalf to process personal data. We have outsourced IT management, communication system services and visitor management in the reception area to external service providers, on whose servers, which they manage and secure, personal data is stored. We have ensured your data protection by entering into the necessary data processing agreements with our subcontractors. For further details, please contact the point of contact specified in section 1.

5. Do we transfer your data outside the EU or the EEA?

As a general rule, we do not transfer your personal data outside the EU/EEA. However, the IT management systems we use may allow a service provider to access data from outside the EU/EEA. Where personal data is processed outside the EU or the EEA, we ensure that the subcontractor has committed to the appropriate safeguards required by the General Data Protection Regulation, such as the European Commission's standard contractual clauses for the transfer of personal data and any necessary additional safeguards.

6. How do we protect your data and for how long do we retain it?

Only those of our employees who, by virtue of their role, are authorised to process customer data are permitted to access the system containing personal data. Each user has their own username and password for the system. Data is stored in databases that are protected by firewalls, passwords and other technical measures. The databases and their backups are

located in locked premises, and access to the data is restricted to certain pre-designated individuals.

We regularly assess the necessity of retaining data, taking into account applicable legislation. As a general rule, we retain the data of our customers and other partners for the duration of the contract and for the necessary period for handling complaints or legal claims thereafter. We generally retain call recordings for 30 days, after which they are automatically deleted. Recordings relating to complaints or customer feedback are retained on a case-by-case basis for 24 months or for as long as is necessary to investigate the matter in question. Visitor data from our reception service is retained for 12 months. Data relating to mandatory sanction inspections is retained for 5 years from the end of the contractual relationship or business transaction.

In addition, we take reasonable measures to ensure that no personal data of data subjects is retained that is incompatible with the purposes of processing, out of date or incorrect. We will rectify or erase such data without delay.

7. Your rights as a data subject

You have the right to access your personal data and to request the rectification or erasure of any data that is inaccurate, out of date or unlawful. You may also use your technical access credentials, username and password to access your data stored in the system, and to update or amend this data.

Where processing is based on consent, you also have the right to withdraw or amend your consent at any time. Withdrawing your consent does not affect the lawfulness of any processing carried out prior to the withdrawal.

You have the right to object to or request the restriction of the processing of your data, and to lodge a complaint regarding the processing of personal data with the supervisory authority (the Office of the Data Protection Ombudsman). The contact details for the Office of the Data Protection Ombudsman can be found at www.tietosuoja.fi.

For specific personal reasons, you also have the right to object to processing activities concerning you where the basis for processing is a legitimate interest. When making your request, you must specify the particular circumstances on which you base your objection to the processing. We may refuse to comply with a request to object only on grounds provided for by law.

8. Enquiries and amendments to the privacy notice

Please submit all enquiries and requests regarding this privacy notice in writing or in person to the contact point specified in section one (1).

Are may make changes to and update this privacy policy as necessary. Where required by applicable legislation, such changes will be discussed with employee representatives. However, we recommend that you review this privacy policy from time to time.