

LARSEN PRIVACY POLICY

Last modified on June 10, 2019

1. SCOPE OF PRIVACY POLICY

- 1.1. This privacy policy (hereinafter: **Privacy Policy**) applies to all cases where Marienthali Hostel OÜ (hereinafter: **we** or **us**) processes personal data of natural persons (hereinafter: **you**) as a controller when offering you or providing you accommodation services (hereinafter: **Services**).
- 1.2. We are committed to protecting and respecting your privacy. Please read the Privacy Policy carefully to understand our rules and practices regarding processing your personal data.
- 1.3. The Privacy Policy is effective as of the date set forth above. The Privacy Policy is an integral part of our general terms and conditions (which you can read at <https://apartments.larsen.ee/>) as well as any specific accommodation agreement that may be concluded between you and us.

2. DATA CONTROLLER

- 2.1. For the purpose of clarity, the data controller is Marienthali Hostel OÜ, located at Vana-Lõuna 39/1, 10134 Tallinn, Estonia (company registry code: 14498067).
- 2.2. All questions, comments and requests regarding data processing are welcome and should be addressed at apartments@larsen.ee .

3. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS AND WHY

- 3.1. We collect and process your personal data for the following purposes:
 - 3.1.1. Providing you Services, which includes communicating with you;
 - 3.1.2. Providing you Services in the future, which also includes communicating with you;
 - 3.1.3. Enforcing and defending our legal rights;
 - 3.1.4. Complying with legal obligations and requests, including the obligations established for the accommodation service providers.
- 3.2. We collect and process the following personal data:
 - 3.2.1. For the purposes stated in sections 3.1.1 and 3.1.2: your name, e-mail address, ID number (if you have one), phone number, nationality, gender, date of birth, name of the school you will be studying in during your stay, apartment type, date of visiting the apartment (if you wish to see the apartment before the accommodation period), dates of moving in and out, any add-on services (if any), description of your personality, emergency contact phone number, emergency contact name and relation, other comments including questions or special requests (which you may provide voluntarily), payment data;
 - 3.2.2. For the purpose stated in section 3.1.3: name, e-mail address, ID number (if you have one), phone number, nationality, date of birth,

name of the school you will be studying in during your stay, apartment type, date of visiting the apartment (if you wish to see the apartment before the accommodation period), dates of moving in and out, any add-on services (if any), emergency contact phone number, emergency contact name and relation, other comments including questions or special requests (which you may provide voluntarily), payment data, door logs (generated by a digital locking system);

3.2.3. For the purpose stated in section 3.1.4: any of the categories of personal data listed above (determined case-by-case according to the legal obligation we are subject to), but also the following personal data for fulfilling the legal obligations applicable to accommodation service providers:

- a) The period of provision of the Services, a copy of your identity document, name, date of birth, citizenship and address. Also, the name, date of birth and citizenship of your spouse or a minor if accommodated together with you.
- b) Also the following personal data if you are not a citizen of Estonia, another Member State of the European Economic Area or Switzerland or an alien residing in Estonia on the basis of a residence permit or right of residence: the type and number of your (and your spouse's or minor's, if accommodated together with you) travel document and the state which issued it.

3.3. The personal data processed by us is collected directly from you.

3.4. Submitting the above listed personal data (except for your gender) is obligatory to enter into a contract for the provision of Services. If the data is not provided, the contract cannot be concluded.

4. LEGAL BASIS FOR PROCESSING PERSONAL DATA

4.1. We process your personal data for providing you Services because it is necessary for the fulfilment of a contract which is concluded between you and us (see section 3.1.1). In such a case the legal basis for processing data is the contract concluded between you and us.

4.2. We process your personal data for taking steps at your request prior to entering into a contract (see section 3.1.2). In such a case the legal basis for processing data is your request prior to entering into a contract.

4.3. We process your personal data for enforcing and defending our legal rights under legitimate interest pursued by us (see section 3.1.3). It is our legitimate interest to enforce and defend our legal rights if we see it as necessary (e.g. to file a claim against you if you have infringed the contract concluded for the provision of Services).

4.4. We process your personal data for complying with legal obligations (including obligations for accommodation service providers) as the processing is necessary for compliance with the legal obligation to which we are subject (see section 3.1.4).

5. DISCLOSING YOUR PERSONAL DATA

5.1. We will not transfer your personal data to third parties, except:

- 5.1.1. to companies which provide us cloud server computing services in which we store and process personal data (e.g. Microsoft Corporation, established in the US). Microsoft Corporation has joined the EU-U.S. Privacy Shield Framework which ensures the same level protection for personal data as set in the European Union (for more detailed information see <https://privacy.microsoft.com/en-us/privacystatement>);
- 5.1.2. to companies which provide us software development, processing the personal data submitted via our website (e.g. Hmmm OÜ, established in Estonia);
- 5.1.3. to companies which generate contracts for providing you Services, processing the personal data contained in such a contract (e.g. Dokobit, UAB, established in Lithuania and PandaDoc Inc., established in the US). Pandadoc has joined the EU-U.S. Privacy Shield Framework which ensures the same level protection for personal data as set in the European Union;
- 5.1.4. to companies which provide us data collection platform service, processing the personal data which you submit to us via our website (e.g. TYPEFORM S.L., established in Spain);
- 5.1.5. to companies which provide us customer management tool, processing the personal data you submit to us (e.g. Pipedrive OÜ, established in Estonia);
- 5.1.6. to companies which provide us calendar management tool, processing the personal data of calendar appointment when you want to see the apartment (e.g. Calendly LLC, established in the US). Standard data protection clauses issued by the European Commission are applied in this case for the transfer of personal data to processors established in third countries (for more detailed information see <https://calendly.com/pages/dpa>);
- 5.1.7. to companies which provide us door access control system, processing the personal data necessary for operating such system (e.g. Salto Systems, S.L., established in Spain and Telia Eesti AS, established in Estonia);
- 5.1.8. to companies which provide to us e-mail server services, where we use e-mails for transferring personal data (e.g. Microsoft Corporation, established in the US). Microsoft Corporation has joined the EU-U.S. Privacy Shield Framework which ensures the same level protection for personal data as set in the European Union (for more detailed information see <https://privacy.microsoft.com/en-us/privacystatement>);
- 5.1.9. to companies which help us to generate invoices, processing your personal data included in the invoices (e.g. AS Merit Tarkvara, established in Estonia);
- 5.1.10. to companies which provide us security deposit guarantee services, processing the personal data you provide for providing the security deposit (e.g. Bailsman Group OÜ, established in Estonia);
- 5.1.11. to companies which provide us debt collection services, processing your personal data for debt collection proceedings and procedures

(service provider will be determined when service is purchased – until then, no data is transferred to any third party);

- 5.1.12. to companies which provide us accounting services, processing accounting documents and the personal data contained therein (e.g. AS Merit Tarkvara and Destra Finants OÜ, both established in Estonia);
 - 5.1.13. to companies which provide us integration services (including but not limited to between Typeform and Pipedrive; e.g. Zapier, Inc., established in the US). Zapier, Inc. has joined the EU-U.S. Privacy Shield Framework which ensures the same level protection for personal data as set in the European Union.
 - 5.1.14. to a relevant institution requiring your personal data, if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- 5.2. We take steps to verify that processors who we appoint to process personal data on our behalf will protect that personal data as required under data protection legislation.

6. HOW LONG DO WE STORE YOUR PERSONAL DATA

- 6.1. We only process and store your personal data for as long as it is necessary to fulfil the purpose for which it is processed – once the purpose has ceased, your personal data will be erased or anonymised.
- 6.2. Your personal data will be stored:
 - 6.2.1. up to 3 years after the end of provision of Services to you where we process your personal data for providing Services to you (see section 3.1.1);
 - 6.2.2. up to 3 years after the last pre-contractual communication with you where we process your personal data for providing you Services in the future (see section 3.1.2);
 - 6.2.3. determined case-by-case according to the expiry date of the claim which we may submit or the claim which may be submitted against us but no longer than 10 years from the moment when the limitation period for the claim started, where we process your personal data for enforcing and defending our legal rights (see section 3.1.3);
 - 6.2.4. determined case-by-case according to the legal obligation that we are subject to but no longer than 10 years from the circumstance which creates the legal obligation to us (unless a longer period is required under law), where we process your personal data regarding fulfilment of obligations established under law (see section 3.1.4). Personal data which we are obliged to process as a accommodation service provider is retained for 2 years.
- 6.3. Personal data contained in any accounting documents (e.g. invoices) shall be stored for 7 years from the end of the last financial year they relate to.

7. YOUR RIGHTS

- 7.1. You have the right to contact us at apartments@larsen.ee to exercise your rights concerning processing of personal data. Such rights include the:

- 7.1.1. right to request access of personal data;
- 7.1.2. right to request rectification of personal data;
- 7.1.3. right to request erasure of personal data;
- 7.1.4. right to request restriction of processing of personal data;
- 7.1.5. right to object to processing of personal data;
- 7.1.6. right to request portability of personal data;
- 7.1.7. right that decisions are not taken concerning you which are based on automated decision-making;
- 7.1.8. right to withdraw a consent;
- 7.1.9. right to lodge a complaint with a supervisory authority (for further information see: <https://www.aki.ee/en>; supervisory authority's e-mail address: aki@info.ee).

8. CHANGES TO THE PRIVACY POLICY

- 8.1. We have the right to unilaterally amend and supplement the Privacy Policy. The amended Privacy Policy shall be sent to you by e-mail.