Procedure: Privacy Policy of MTÜ Tartu Üliõpilasküla Owner of document: Lawyer Document reference: A1/2 Valid from: 24.09.2025

PRIVACY POLICY OF MTÜ TARTU ÜLIÕPILASKÜLA ANNEX 1

PROCESSING OF PERSONAL DATA OF TENANTS

1. PURPOSES OF AND LEGAL BASIS FOR PERSONAL DATA PROCESSING

- 1.1. When filling in a housing application on the Student Village website www.campus.ee or www.studenthostel.ee the tenant confirms that they are aware of the use of their personal data for the purpose of entering into a tenancy contract and that they have read the Privacy Policy of the Student Village.
- 1.2. When processing personal data, the Student Village proceeds from the principle of minimality, only collecting the personal data that is necessary for meeting the purposes of processing.
- 1.3. The Student Village processes the tenant's personal data for the following purposes:
 - 1.3.1. processing of housing applications, reserving and approving places
 - 1.3.2. preparing and entering into tenancy contracts
 - 1.3.3. submitting and settling invoices
 - 1.3.4. customer communication, including contacting in urgent matters
 - 1.3.5. processing of means of access and granting other rights to use services
 - 1.3.6. performing obligations arising from legislation
 - 1.3.7. improving its service
 - 1.3.8. defending the rights of the Student Village
- 1.4. The basis for processing personal data is the consent of the tenant, a contract and/or an obligation established by law.

2. COLLECTION AND COMPOSITION OF PERSONAL DATA

- 2.1. The Student Village mainly receives the personal data of its tenants directly from the tenant when the tenant submits a housing application through the website of the Student Village.
- 2.2. The Student Village processes the following personal data of the tenants entered in the housing application by the tenants:
 - 2.2.1.**identification data:** first name and surname, gender, personal ID code, date of birth, citizenship
 - 2.2.2. **contact details**: telephone number, home address (street, building number, flat number, city, county, country, postcode), email address, first name and surname and telephone number of contact person
 - 2.2.3. academic details: educational institution
 - 2.2.4. **bank details**: account number (IBAN), SWIFT (BIC); for international students and international guest students also: name of bank, account holder, address of account holder

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2.3. The Student Village processes the following personal data of the tenants submitted voluntarily to the Student Village by the tenants:

- 2.3.1. other personal data of tenants: car registration number, lifestyle (morning person/evening person, smoker/non-smoker), data supplied in the customer satisfaction questionnaire, other comments in the housing application, such as the name of the preferred roommate.
- 2.4. The Student Village is responsible for the processing of the personal data in its possession and the tenants can decide on the composition of the data they voluntarily provide. The Student Village cannot be held liable for a tenant's decision to provide excessive personal data or special categories of personal data to the Student Village if the Student Village has not requested them.

3. RETENTION OF AND ACCESS RIGHTS TO PERSONAL DATA

- 3.1. Access to personal data for the purposes of processing and alteration is only granted to Student Village employees that need such access for the performance of their tasks. The personal data of all tenants is treated as confidential information.
- 3.2. Tenants can view the personal data collected on them in the e-kyla information system and request information on this from the Student Village.
- 3.3. The Student Village retains the personal data of tenants for as long as necessary in the opinion of the Student Village for meeting the purposes of processing or as set forth by law. Detailed information on personal data retention periods can be obtained by sending the respective request to the Student Village.
- 3.4. The Student Village does not issue or transfer personal data to any third parties without the prior consent of the tenant unless the relevant obligation arises from law. Regardless of access restrictions, the Student Village issues personal data at the request of authorities (e.g. law enforcement authorities) or to defend its rights in the cases set forth by legislation.
- 3.5. The Student Village is not liable for the actions of a third party if the third party is an independent data controller.