

Processing of personal data in the Hoas Match service

1) Data controller

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2) Purpose of use of personal data and legal basis for processing

The Hoas Match service is a free and optional additional service for potential applicants and tenants of Hoas. Applying for housing at Hoas does not require using Hoas Match but adopting the service and the processing of personal data therein are based on the user's own free will to release their information for processing in the service.

In Hoas Match, the purpose of processing personal data is to match two or more housing applicants to the same apartment in the Hoas housing application process by generating a common flatmate application code for the applicants.

The processing of personal data is based on the data subject's consent or a legitimate interest of Hoas. If the processing is based on a legitimate interest of Hoas, that legitimate interest is one of the following:

- Ensuring information security and investigating errors;
- Preventing and investigating any misconduct in the service;
- Protecting the property of Hoas.

Hoas Match service uses profiling to propose recommended match candidates for the user of the service. The profiling is done using information on the users' living habits and personalities entered by the users to the Hoas Match service. Any data recorded and data combinations and searches generated by profiling in the Hoas Match service are only processed for the purposes of providing the service, i.e. for purposes of assisted finding of suitable flatmates.

3) Processed personal data

The personal data processed in the Hoas Match service: first name, last name, sex, profile picture, date of birth, spoken languages, information on pets, information on smoking, place and location of studies, current place of residence, email address, informal introduction of the person, wishes related to the apartment, personality and habits, wishes related to the flatmate, search machine criteria. Additional information on the processing of personal data can be found in the Privacy Policy of Hoas applicant and tenant data: www.hoas.fi/en/hoas/hoas/privacy-policy/storage-of-personal-data.

Registering in the service requires a Facebook account, and everyone who registers in the service uses their own Facebook account for authentication. This diminishes the risk of being able to create so-called fake profiles in the Hoas Match service.

The user sets their own profiling information and the desired profiling information for their flatmate in the service. These may deviate from one another. The service uses free text boxes for communication between users.

When you are using the service, we collect metadata such as time and duration of roaming in the service, amount of transferred data, web browser type, IP address, operating system and user interface, and version and language of browser.

3.1) Metadata collected in cookies

We use cookies on the Hoas Match site at <https://hoasmatch.fi>. Hoas and the service providers we employ collect metadata regarding the use of the Hoas Match Web site, that is, observed and derived data such as the IP address associated with the user; the Web address of the site via which the user accessed the Hoas Match site; model and operating system of the user's end device; information about Hoas Match cookies already saved on the user's device; time, date, and duration of visit to the Hoas Match site; and information about the specific page(s) on the Hoas Match site that the visitor has accessed.

Hoas collects data that is recorded in the log data of the Hoas Match Web site in connection with regular site maintenance, as well as analytics data by using our own cookies and service providers' cookies regarding the use of the Hoas Match Web site. Hoas utilises the Google Analytics service. The collected data never contains a person's name, SSN, or any other identifiable piece of information and Hoas shall never attempt to identify an individual visitor to the Hoas Match site on the basis of this metadata.

4) Regular data sources

Personal data are collected directly from the data subject when they are using the service or from a third party (Facebook). The registration to the service occurs via Facebook, and in this context Facebook provides us with certain data you have entered in Facebook (your name and profile picture) and some technical information. In addition, data concerning the user are collected from the user themselves as they use the service.

5) Protection of personal data and data security

Hoas Match data is stored at Microsoft Azure in the EU area. Telecommunications to any databases containing personal data have been protected using encrypted connections and appropriate authentication. The databases and systems using them have been protected with technical and administrative means. In service reporting, the data has been pseudonymised. User data is accessible only by third party application development experts for development and maintenance of this particular service. Hoas staff does not have access to this data. Log data and metadata accumulating on the server is only used to investigate any technical problems and, by authorities, possible misconduct of the service.

No Hoas Match data is transferred to Hoas Applicant and tenant register except the flatmate code. Use of a personal data register of Hoas always requires login and password. User rights are defined role-specifically according to what is necessary at the time for the employee in question to fulfil their duties. The staff is trained to process data in accordance with good data security practices, and they have a duty to maintain confidentiality. Any third party organisations with the role of personal data processor are bound by bilateral confidentiality agreements.



6) Regular release of register data

No personal data from Hoas Match is released to third parties, nor are any personal data used for marketing purposes.

7) The duration of personal data storage

The personal data of a registered user is stored for one year after the last login. A data subject can, should they so wish, delete their own data immediately by logging in the service and deleting their user account.

8) Rights of the data subject

A data subject can inspect their own personal data by logging in the service. The user may, for their own part, suspend the use of the service, making their profile invisible in search results. The user may also, at any time, withdraw their consent for personal data processing and completely delete their own user account from the service. If the data is not updated and the service is not used for more than a year, the user's account and all data therein are permanently deleted.

In certain situations, the data subject may also have the right to object to the processing of their personal data. The right to object is applicable in situations where the processing of personal data is based on Hoas' legitimate interest, and Hoas is liable to abide by the data subject's request unless they have compellingly legitimate grounds to override the interests, rights and freedoms of the data subject, or if the processing is necessary for the establishment, exercise or defence of legal claims. In addition, in some situations the data subject has the right to request Hoas to restrict the processing of their personal data.

The user has the right to access their personal data they had submitted to Hoas in a computerised form and the right to transfer the data to another data controller without restriction by Hoas. Due to the nature and purpose of the service, transferring the personal data concerning the data subject to another corresponding system directly by Hoas is not feasible technically or logically. As for Hoas Match, the user may deliver their own personal data given to them due to the right to access to another data controller - for example as a printed version - should they wish to do so.

9) The right to lodge a complaint to a supervisory authority

The applicant or tenant has the right to lodge a complaint to a competent supervisory authority (The Data Protection Ombudsman, Ratapihantie 9, POB 800, 00521 Helsinki, Finland or tietosuoja@om.fi) or the supervisory authority of the EU member state where the data subject's domicile or workplace is located, should they deem their personal data not having been processed in accordance to applicable data protection legislation.

10) Changes to this Privacy Policy

This Privacy Policy may be updated at times, for example if there are changes in legislation. This Privacy Policy has been updated last on 31st of May 2018.

