

Disclosure of Personal Data to the Property Owner in Cases of Joint Data Controllership

In properties where INNA Danmark and the property owner act as **joint data controllers**, certain personal data relating to residents is shared as part of the joint administration of the property and the fulfilment of the owner's obligations.

Such disclosure takes place only to the extent necessary for the administration, accounting, oversight, and maintenance of the property.

Categories of personal data shared

The property owner may be granted access to, or receive, relevant information about residents, including:

- **Identification and contact details**
(name, address, telephone number, and email address)
- **Tenancy-related information**
(move-in and move-out dates, lease agreements, addenda, and move-in/move-out inspection reports)
- **Financial information related to the tenancy**
(charges, invoices, payments, account statements, price index adjustments, and information regarding any outstanding arrears)
- **Utility consumption data**
(for example, information relating to the consumption of water, heating, or other utilities, where applicable)

The property owner typically accesses this information through INNA Danmark's systems as part of the ongoing administration of the property.

Disclosure in special circumstances

In certain exceptional situations, personal data may be shared in connection with **damage to the property or an individual dwelling**, such as water damage or similar incidents requiring the involvement of the property owner.

In such cases, the disclosure is generally limited to:

- the address of the dwelling, and
- to a limited extent, basic contact details (name, email address, and telephone number),

and only where necessary for handling the specific incident. This type of disclosure occurs relatively rarely.

Information on joint controllership

pursuant to Article 26 (2) sentence 2 GDPR

1. What is the reason for joint controllership?

The following companies work closely together in the management of the residential property Kaktus Towers, Dybbølsbro 1, 1577 Copenhagen:

- Quantum Immobilien Kapitalverwaltungsgesellschaft mbH (owner)
- INNA Danmark A/S (property manager)

This also applies to the processing of your personal data. The parties have jointly determined the order in which this data is processed in the individual process steps. They are therefore responsible as joint controllers for the protection of your personal data within the process stages described below (Article 26 GDPR).

2. For which process stages is there joint responsibility?

2a. The owner is responsible for the following process stages:

- Handing over all the necessary information and documents to the property manager so that they can manage the property.
- Making decisions regarding various administrative activities.
- Withdrawal of all information after the end of the agreement with the property manager.

2b. The property manager is responsible for the following process stages:

- Establishment, implementation and handling of the lease, e.g.
 - Receipt of all information and documents from the owner
 - Letting, i.e. searching for and selecting tenants
 - Inspection of the leased property, contract negotiations and conclusion of contracts and handover of the leased premises
 - Creation of a bank account for rents and service charges, settlement of advance payments for operating and heating costs with tenants, monitoring of rents, review and implementation of rent increases
 - Receipt and management of security deposits from tenants
 - Monitoring of the leased premises, compliance with the house rules and handling of house rules matters, such as enquiries, complaints and obligations
 - Handling declarations of intent that lead to the termination of the lease, for example
 - Repossession of the leased premises upon termination of the lease
 - Exercise of the landlord's lien, return of collateral, e.g. deposit statement
 - Handling all verbal and written communication with tenants
 - Maintaining tenant files of the owner
 - Extrajudicial and judicial assertion of any claims by the owner
 - Communication about important matters with the owner
- Establishment, implementation and processing of property management contracts, e.g.
 - Consultancy services regarding the necessity and expediency of contracts, obtaining offers and concluding contracts for e.g. construction measures, caretaker services, insurance, maintenance

contracts for technical equipment, clearing and gritting services, energy services (e.g. electricity, water, gas), disposal, maintenance and repair (e.g. building tradespeople, architects)

- Monitoring and proper implementation of contracts, i.e. random checks, invoice verification, acceptance, handling of defects and obligations to ensure public safety
- Termination of contracts and settlement of accounts
- Submission of declarations of intent in consultation with the owner
- Conducting all correspondence with the authorities and contractual partners of the owner
- Coordination of viewing appointments
- Legal support for the owner for the necessity and expediency of legal proceedings and, if necessary, the appointment of lawyers
- Financial and asset management
 - Set-up and management of accounting
 - Budget management, accounting and reporting and payment transactions
- Technical management
 - Proper maintenance and repair of the properties, i.e.
 - Monitoring the structural and technical condition
 - Advising the owner on the necessity of measures
 - Obtaining cost estimates and offers
 - Supervision of the work including acceptance and defect management
 - Implementation of immediate measures in urgent cases
 - Damage reports
 - Organisation and monitoring in the area of road safety
 - Random monitoring of the proper use of the property, including carrying out cosmetic repairs
 - Implementation of structural changes
 - Access control management (locking system)
 - Arranging inspections and maintenance of safety equipment by service providers and experts
 - Participation in the settlement of insurance claims, e.g. damage assessment and rectification
 - Management of the property's construction files
- Special services
 - Dunning
 - Warranty tracking

3. What have the parties agreed?

In the context of their joint controllership under data protection law, the owner and the property manager have agreed which of them fulfils which obligations under the GDPR. This applies in particular to the exercise of the rights of the data subjects and the fulfilment of the information obligations in accordance with Articles 13 and 14 GDPR.

This agreement is necessary because personal data is processed in different process stages during property management, which are operated either by the owner or the property manager.

4. What does this mean for you as the data subject?

Even in the case of a joint controller arrangement, the parties fulfil the data protection obligations in accordance with their respective responsibilities for the individual process stages as follows:

- Within the scope of joint controllership
 - the owner is responsible for processing the personal data in section 2a.
 - the property manager is responsible for processing the personal data in section 2b.
- The owner and the property manager shall make the information required under Articles 13 and 14 GDPR available to the data subjects free of charge in a concise, transparent, intelligible and easily accessible form, using clear and plain language. Each party shall provide the other party with all necessary information from its sphere of activity.
- The parties shall inform each other without undue delay of any legal interests asserted by data subjects. They shall provide each other with all information necessary to respond to requests for information.
- Data protection rights can be asserted against both the owner and the property manager. Contact details are provided separately to the data subjects as part of the information obligations. To exercise the rights of data subjects, it is sufficient to make a request to a controller. The request is then passed on to the respective other controller.

Contact details for the owner and property manager:

Owner:

Name: Quantum Immobilien Kapitalverwaltungsgesellschaft mbH

Address: Dornbusch 4, 20095 Hamburg

Data protection contact: datenschutz@quantum.ag

Property Manager:

Name: INNA Danmark A/S

Address: Gammel Køge Landevej 57, 3. sal, 2500 Valby

Data protection contact: compliance@inna.dk