

## PRIVACY STATEMENT FOR CAMERA SURVEILLANCE AND ACCESS CONTROL SYSTEMS

Controller Steveco Oy, Kirkkokatu 1, FI-48100 Kotka,  
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### 1 Preface

This privacy statement explains how personal data is processed in connection with camera surveillance and access control systems.

### 2 The purpose for processing personal data

The purpose of camera surveillance and access control is to ensure the safety of employees and others, protect property, and monitor operations, as well as to prevent and identify potential situations that may threaten safety, property, or operations.

Electronic access control monitors the movement of staff and visitors within the premises and port areas to ensure the company has up-to-date information.

The purpose of recording visitor information is to ensure facility and personnel safety. Our AEO authorization also requires the registration and identification of all individuals within the premises.

The visitor register stores information on individuals visiting the premises. Data on visitors and the timing of their visits are recorded to monitor visitors, visit times, and number of visitors.

## Privacy statement for camera surveillance and access control systems

### 3 Data being processed

The register includes footage captured by surveillance cameras showing movements within port areas. Camera surveillance includes date and time, no sound.

Electronic Access control records user's name, ID number, arrival and check-out times. That information is transferred to working time tracking.

When visiting Steveco the visitor fills in his/her details in the visitor register: name, company, date, type of visit, host and authorises the data to be stored in the visitor register.

### 4 Legal bases for processing personal data

The processing of personal data is based on the legal grounds provided by the General Data Protection Regulation (GDPR).

#### **Legitimate interest**

The recording of data in the camera surveillance and visitor registers is based on legitimate interest (GDPR Article 6, 1(f)).

#### **Contract**

Electronic access control for staff is based on the employment contract between the company and the employee (GDPR Article 6, 1(b)).

### 5 Collecting the personal data

Camera surveillance recordings are obtained from the company's cameras operating in port areas.

In access control, personal data is collected directly from the data subject (employee or visitor).

### 6 Transferring the personal data with third parties

Camera surveillance recordings are not transferred or disclosed outside the data controller, except upon request to authorities or insurance companies.

Visitor register data may be disclosed in exceptional situations to authorities (e.g., in the case of a fire alarm) or in accordance with legal requirements, such as to customs during an AEO inspection at the company's premises. Data is not disclosed electronically.

## Privacy statement for camera surveillance and access control systems

## 7 Transferring the personal data to third countries

The data controller does not transfer or disclose data outside the European Union or the European Economic Area.

## 8 Storing the personal data

Camera surveillance recordings are retained as follows:

- Hietanen 2 months
- Vuosaari 2 months
- Kotka Mussalo 11–12 months

After this period, the oldest recordings are automatically overwritten by new recordings.

Data from camera surveillance recordings may be collected for the investigation of criminal or damage-related incidents. In such cases, any personal data in the recordings is anonymized so that individuals can no longer be identified. These recordings are retained for six years after the conclusion of the investigation.

Data from visitor register is retained for one year following the end of the current year.

## 9 Protection of your personal data

We implement necessary technical and organizational security measures to protect recordings and data. Access control to premises, user accounts, and passwords ensure that unauthorized individuals cannot access the data. Access rights to the register are granted only to individuals who need the data to perform their duties. Individuals handling personal data are bound by confidentiality obligations.

Manual records of visitors are stored in a locked and monitored location. Access to this data is restricted to designated individuals only.

## 10 Your rights and how to use them

### Right to access personal data

You have the right to be informed about the processing that we do and to request a copy of your personal data.

### Right to correct personal data and right to deletion

You can ask for the information about you to be corrected if it is not accurate or if it needs to be updated. We will delete the data at your request if it is no longer legitimately needed.

## Privacy statement for camera surveillance and access control systems

### **Right to Restrict Processing**

In certain circumstances you have the right to have the processing restricted.

### **Right to Data Portability**

You can obtain and reuse the personal data you have provided us. We can provide a selected set of the data delivered in a machine-readable format, where the basis of processing has been either contract or consent.

### **Right to object to the processing**

You have the right to object to the processing of your personal data on our legitimate interests. We may reject your request if there is a compelling reason for continuing the processing.

### **Right to opt out from automated decision making**

You have the right to object any automated decision-making process (not utilized at Steveco).

### **Exercise of your rights**

If you have any question about your rights or want to exercise them, please contact us by using the tietosuoja(at)steveco.fi email address or by filing a request via our whistleblowing channel. Some rights may not be applicable for example if the data cannot be connected to you.

We will respond to the request without undue delay, in any case no later than one month after receiving the request.

## **11 The right to file a complaint to the data protection authority**

If you are not satisfied with the way we handle personal data, or we do not act in accordance with your requests, you can contact your national data protection authority. The national supervisory authority and its contact details has been provided below:

Office of the Data Protection Ombudsman  
Postal address: P.O. Box 800, 00531 Helsinki, Finland  
E-mail: tietosuoja(at)om.fi  
Switchboard: 029 566 6700

## **12 Informing the personal data collection**

Before registering a visitor in the visitor register, the data subject is informed about the data protection practices and that their information will be recorded in the company's visitor register. The data subject is provided with a copy of the privacy notice, which is also available on our website.

There are signs indicating camera surveillance at the port area gates in Vuosaari, Mussalo, Hietanen and Hamina.

## Privacy statement for camera surveillance and access control systems

**This privacy policy has been updated as follows after May 21, 2024:**

- **27.3.2025** –The information recorded in the visitor register has been updated. The basis for processing, data subject rights and data subject informing has been clarified.