

PRIVACY STATEMENT OF THE REGIONAL CAMERA SURVEILLANCE SYSTEM USED BY THE PORT

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Content

1. Name of data file
2. Controller
3. Person in charge of data file
4. Persons managing data file matters
5. Purpose of data file
6. Basis of maintaining of data file
7. Data content in data file
8. Regular sources of data in the data file
9. Regular disclosures of personal data
10. Internal use of data file
11. External use of data file
12. Connecting the data file to other personal data files
13. Protection of data file
14. Storage, archiving and destruction of personal data file and data file data
15. Informing the data subject
16. Right of inspection
17. Correcting of data
18. Data file administration

1.

Name of data file

Port of HaminaKotka Ltd, Regional camera surveillance system

2.

Controller

Port of HaminaKotka Ltd
Merituulentie 424
48310 Kotka
PL 196, 48101 Kotka, Finland

Tel. +358 (0)20 790 8800
office@haminakotka.fi
Business ID 2380744-8

3.

Person in charge of data file

The person in charge of the data file is Maria Kämäräinen, Manager, Security and Rescue.

The duties of the person in charge include ensuring that the camera surveillance system is used appropriately for the following purposes, among others:

- ♦ checking the rights of access as needed, but at least once a year
- ♦ taking care of the data protection of the data system together with the data management department of Port of HaminaKotka Ltd and the company providing maintenance services
- ♦ ensuring that the use of the system is provided with instruction and that sufficient training is provided for the users.

4.

Persons managing data file matters

- ♦ Maria Kämäräinen, Manager, Security and Rescue 020 790 8851
- ♦ Kim Kosunen, Security Technology Specialist 020 790 8852

5.

Purpose of data file

The system is used to fulfil the statutory obligations of the port company in the control of security areas.

6.

Basis of maintaining of data file

Act on the Security of Certain Ships and Associated Port Facilities and on Monitoring Maritime Security (11 June 2004/485), General Data Protection Regulation of the EU (2016/679), Article 6.

7.

Data content in data file

Video recordings of sites in the land and sea areas of the Port of HaminaKotka in Hamina and Kotka are registered in the system. These include:

- ♦ Access ways
- ♦ Traffic routes
- ♦ Fence lines
- ♦ Quay areas
- ♦ Fairways

The camera surveillance system records video of items such as persons, vehicles and other traffic moving in the area.

The recording is stored for a maximum of 31 days. If a notification of a deviation is received during the storage period, the recording will be stored in this respect for the time necessary to investigate the deviation.

8.

Regular sources of data in the data file

The regular source of data are surveillance cameras, which record data from the areas they cover in a digital recorder (data file).

9.

Regular disclosures of personal data

As a rule, data is not disclosed. Data may be disclosed to the police and other authorities in cases where a crime has been committed or is suspected to have been committed, or if the security of the port is considered to have been compromised. The authorities use the data in the system to prevent and investigate crimes and bring them under consideration for prosecution. The data in the data file is not disclosed outside the EU or the EEA.

10.

Internal use of data file

The data file is used to protect personal safety and security, the safety and security of the port and ships as well as to ensure the maintenance of the condition and order of the real estate units and to hold those who have caused damage liable. The data file is only used by persons who have right of access to it. The decision to grant user rights is made by the Safety and Security Unit. The users are separately specified persons of Port of HaminaKotka Ltd and the security company (Securitas).

11.

External use of data file

Data file data may be provided to the authorities upon request in accordance with Chapter 9 of this statement.

12.

Connecting the data file to other personal data files

The camera surveillance system is not connected to other data files.

13.

Protection of data file

The digital recorders of the system are placed in a locked facility that can only be accessed by designated persons. The data file is only used by persons who have right of access to it. Personal data are processed in accordance with the data protection legislation and requirements imposed by authorities.

14.

Storage, archiving and destruction of personal data file and data file data

The storage period is a maximum of 31 days, after which a new recording destroys the previous one. A recording can be transferred to a separate file and thus stored if a deviation has been reported and when the recording may be useful in resolving the deviation. Such a recording is destroyed when there are no longer grounds for retaining it.

15.

Informing the data subject

There is a notice of recording camera surveillance at the entrances to the port area. The privacy statement of camera surveillance is available on the website of Port of HaminaKotka Ltd.

16.

Right of inspection

Regardless of secrecy provisions, everyone has the right of access, after having supplied sufficient search criteria, to the data on him/her in this personal data file, or to a notice that the file contains no such data.

17.

Correcting of data

The controller shall, on its own initiative or at the request of the data subject, without undue delay rectify, erase or supplement personal data that is contained in its personal data file and that is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing.

18.

Data file administration

Data file functions are carried out by persons employed by Port of HaminaKotka Ltd or authorised by them (security company) within the scope of access rights.