



PORT OF HAMINAKOTKA

Safety and Security Unit

PRIVACY STATEMENT

1 (6)

19 June 2025

PRIVACY STATEMENT OF THE VISY ACCESS GATE ACCESS CONTROL SYSTEM USED BY PORT OF HAMINAKOTKA LTD

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1.

Name of data file

Port of HaminaKotka Ltd's VISY Access Gate access control data file.
The software supplier is Visy Oy.

2.

Controller

HaminaKotka Satama Oy
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 VISY Access Gate access control software is used appropriately for the following purposes, among others:

- ♦ checking the access rights of the software 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
- ♦ ensuring the maintenance of the system together with the company providing the maintenance services.



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4.

Persons managing data file matters

Kim Kosunen, Security Technology Specialist, is the person in charge of the management of the VISY Access Gate access control system. He is responsible for the maintenance of the data file and, if necessary, provides more detailed information about the data file and the rights of the data subject.

The data is maintained by separately designated users of the VISY Access Gate access control software within Port of HaminaKotka Ltd or persons authorised by Port of HaminaKotka Ltd.

5.

Purpose of data file

The purpose of the VISY Access Gate access control software is to administer and maintain the access permits, which are granted to Port of HaminaKotka Ltd's own personnel and stakeholders' personnel based on licence plate recognition, to the industrial, port and ISPS areas of Port of HaminaKotka Ltd. The software is also used for maintaining and managing RFID tags and PIN codes related to access permits to vehicles and persons.

6.

Basis of maintaining of data file

The Regulation of the European Parliament and of the Council on enhancing ship and port facility security (EC) No. 725/2004 and the Act on the Security of Certain Ships and Associated Port Facilities and on Monitoring Maritime Security (No. 485/2004 11 June 2004) require that persons and vehicles moving within port facilities can be identified and their right to move within port facilities can be established.

General Data Protection Regulation of the EU (2016/679), Article 6.

7.

Data content in data file

Name of person, company name, address, email address, telephone number, job at the port.

PIN and RFID identification information for personal and vehicle identifiers and vehicle registration numbers.

Event data of access events to port facilities (including camera recordings at identification points).



8.

Regular sources of data in the data file

The data file is updated and maintained on the basis of the information that customers provide in connection with their access permit applications. The data sources are access permit applications and systems related to the management and control of access rights. The data may also be updated based on notifications submitted by stakeholders.

9.

Regular disclosures of personal data

The data is only used in matters related to access control, and the data is not disclosed. Access permit and event 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 VISY Access Gate access control software is intended for the internal use of Port of HaminaKotka Ltd. The use of the data file requires a personal username and password. The username is provided when granting access to the software. The access to the software expires when the person leaves the tasks for which they have been granted access to the software. The username is removed in the same conjunction.

11.

External use of data file

One of the features of the VISY Access Gate access control software is that separately named stakeholders are given the right to grant access permits through a browser interface. The username and password are personal.

The access control software is also used by customs authorities. The data in the access control software is used for the performance of the customs authority's crime prevention tasks as laid down in the Customs Act. The data in the access control software is utilised and stored in the registration and storage system for licence plates and containers as referred to in section 23d of the Customs Act under the conditions laid down by law. The customs authority uses the data in the system to prevent and investigate crimes and bring them under consideration for prosecution.



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12.

Connecting the data file to other personal data files

The VISY Access Gate access control software is not connected to other data files.

13.

Protection of data file

The system is used in its own closed network. Stakeholders have limited access to the software via the Internet. The use of the software requires a username and password.

The access to the software expires when the person leaves the tasks for which they have been granted access to the software.

14.

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

The data of the permit holders is stored in the VISY Access Gate access control software for the duration of the service or customer relationship (or similar).

Event data on access to port facilities is stored in the system indefinitely.

15.

Informing the data subject

The privacy statement of the VISY Access Gate access control software 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.



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18.

Data file administration

Data file functions are carried out by persons employed by Port of HaminaKotka Ltd within the scope of access rights to the software.