

**Controller:**

Port of HaminaKotka Ltd (hereinafter referred to as Port of HaminaKotka)  
Merituulentie 424  
FI-48310 Kotka, Finland  
P.O. Box 196, 48101 Kotka  
Tel. +358 (0)20 790 8800  
office@haminakotka.fi  
Business identity number 2380744-8

Kotkan Satamatalot Oy (hereinafter referred to as Kotkan Satamatalot)  
Merituulentie 424  
FI-48310 Kotka, Finland  
P.O. Box 196, 48101 Kotka  
Tel. +358 (0)20 790 8862  
satamatalot@haminakotka.fi  
Business identity number 1596128-5

## 1. CUSTOMER REGISTER

**Contact person in matters concerning the data file:**

Data Security Officer Suvi Vänskä, +358 (0)20 790 8803, suvi.vanska@haminakotka.fi  
Marketing Assistant Marjukka Kettunen, +358 (0)20 790 8805, marjukka.kettunen@haminakotka.fi

**Name of data file:**

Customer register

**Purpose of processing of personal data:**

The data file is used for the management and administration of customer relations and potential customer relations. The data file is also used for managing data on stakeholders due to measures required by legislation or as related to safety and security.  
We use a PDS personal and business register system.

Personal data can be administered using various search terms, and groups can be formed of the data.

Customer data are used for invoicing and for the management and administration of customer relations.

**Data content in data file:**

Name, company, duty, department, address, telephone number, e-mail address and customer number.

**Regular sources of data:**

The data for the personal and business data file are obtained at the beginning of the customer relationship when the person in question provides the data for the data file for the management of the customer relationship or in matters related to law or safety and security.

The personal details of the subscribers of the customer newsletter Loiste are obtained when the persons themselves disclose the details by e-mail based on their consent.

**Regular disclosure of data:**

No data are disclosed on a regular basis.

**Transfer of data to outside the EU or EEA:**

No data are transferred to outside the EU or EEA.

**Principles of data file protection:**

Personal data are processed in accordance with the data protection legislation and requirements imposed by authorities.

Electronic personal data are stored on a network disk with restricted access. Computers and the PDS system are protected by access rights. Logging in to the system takes place by means of personal credentials. Port of HaminaKotka Ltd uses a secure network connection.

Personal data on paper are stored appropriately in a locked facility.

The invoices are archived in a locked storage facility for the period of time prescribed by the Accounting Act. The archive can only be accessed with an access card and a personal key.

**Deletion of information:**

The personal and business data files are cleaned regularly, and outdated personal data are completely removed if law does not prevent this.

The papers are disposed of appropriately using data security containers and a data protection service or shredder. The data protection service issues a certificate that is retained.

**Right of access:**

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.

**Right to demand rectification 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 contained in its personal data file and erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing.

## **2. DATA FILE OF HAMINAKOTKA.COM SITE**

**Contact person in matters concerning the data file:**

Data Security Officer Suvi Vänskä, +358 (0)20 790 8803, [suvi.vanska@haminakotka.fi](mailto:suvi.vanska@haminakotka.fi)  
Marketing Assistant Marjukka Kettunen, +358 (0)20 790 8805, [marjukka.kettunen@haminakotka.fi](mailto:marjukka.kettunen@haminakotka.fi)

**Name of data file:**

Personal data collected through website [haminakotka.com](http://haminakotka.com).

**Purpose of processing of personal data:**

The purpose of the processing of personal data is the customer service of Port of HaminaKotka Ltd and Kotkan Satamatalot Oy, answering questions presented by customers and solving problems as well as processing of work and hot work permit applications, access permit applications and truck weighbridge form.

The customers can submit questions and comments via the website [haminakotka.com](http://haminakotka.com). By completing the relevant form, the person submits his/her data and at the same time approves the appropriate processing of personal data. The questions are answered by telephone or e-mail.

Further assistance can be requested via the [haminakotka.com](http://haminakotka.com) website in the following cases: Port services and sea transport, RoRo harbour, liquid harbour, container harbour, industrial facilities and office premises at the port.

Personal data are also collected under items work permit form, hot work permit form, access permit form and truck weighbridge form.

Personal data are also processed in invoicing.

**Data content in data file:**

Name, company, e-mail address, telephone number, country, contact person and contact details in truck weighbridge matters, vehicle licence plate number, customer number and hot work card number.

**Regular sources of data:**

The data are obtained from the person who discloses the data on the website or by email.

**Regular disclosure of data:**

Personal data relating to access permits and weighing are disclosed to Securitas Oy, which processes the access permits of Port of HaminaKotka Ltd and Kotkan Satamatalot Oy, draws up the weighing permits and takes care of administrative work related to weighing. The website platform is Drupal, from which personal data are automatically deleted after 6 months.

**Transfer of data to outside the EU or EEA:**

No data are transferred to outside the EU or EEA.

**Principles of data file protection:**

Personal data are processed in accordance with the data protection legislation and requirements imposed by authorities.

Computers and the PDS system are protected by access rights. Logging in to the system takes place by means of personal credentials. Port of HaminaKotka Ltd uses a secure network connection.

Personal data on paper are stored appropriately in a locked facility.

The invoices are archived in a locked storage facility for the period of time prescribed by the Accounting Act. The archive can only be accessed with an access card and a personal key.

**Deletion of information:**

Customer contacts and e-mail messages are regularly removed in accordance with the processing process.

The personal and business data files are cleaned regularly, and data are completely removed if law does not prevent this.

The papers are disposed of appropriately using data security containers and a data protection service or shredder. The data protection service issues a certificate that is retained.

**Right of access:**

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.

**Right to demand rectification 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 contained in its personal data file and erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing.