

Kotkamills Oy

## **PRIVACY POLICY**

Your privacy is important to us. Kotkamills Oy and its subsidiaries (“Kotkamills”) undertake to protect your privacy and to comply with legislation on the processing of personal data and data protection when you are doing business at or visiting a building or factory site under Kotkamills’ governance. Kotkamills processes the personal data it collects in accordance with the principles described in this Privacy Policy.

If you have any questions about the processing of your personal data, you can always contact Kotkamills using the contact details below. You will also find information on how you can exercise your rights regarding the processing of your personal data.

### 1

#### **CONTROLLER’S CONTACT DETAILS**

Kotkamills Oy and each subsidiary with regard to its own guests and persons moving within the area (hereafter “we” or “Kotkamills”) act as the controller of the personal data processed.

Our contact details for matters involving the processing of personal data related to area security:

*Safety Manager Eeva-Kaisa Hietala*  
*eeva-kaisa.hietala@kotkamills.com*

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#### **HOW WE USE YOUR PERSONAL DATA**

The purpose of the processing of your personal data is to document and maintain information about the company’s visitors, as well as their

arrival records and movement in the factory area. The purpose of processing is also to ensure the safety of the factory area.

Our processing is based on our legitimate interest in managing customer and partner relationships and other stakeholder relationships.

We may also process personal data in order to fulfil our statutory obligations, such as responding to the authorities and in connection with legal claims.

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#### WHAT DATA WE COLLECT ABOUT YOU

The personal data collected in the register is mainly information you provide directly to Kotkamills when you apply for a pass to the factory or when you register your arrival as a visitor.

The personal data we process mainly consists of the information you provide to us. The data is stored in an automated access control and visitor management system based on the information recorded by the guests themselves and the personnel's prior notifications. The personal data we may process is listed below.

Only such personal data as is necessary for the purposes described above are entered in the access control and visitor register. Kotkamills processes the following data:

##### Contact data

- First and last name
- Business address and business ID
- Identifying data (birthdate, tax number)
- Photo of individual
- Phone number, work
- Email address
- Company and position in the company
- Country
- Additional data provided by guest

##### Data about the visit

- Time of the visit and information about the host of the visit
- Video recording from the time of the visit

Kotkamills keeps the data in the video recording separate from other data.

#### 4 WHO WE SHARE YOUR DATA WITH

In principle, we will not share your data. However, we may disclose personal data to authorities in order to comply with our statutory obligations.

Due to the technical implementation of the data processing, some of the data may be physically located on the server of an external subcontractor, from where they are processed by means of remote access. The data are collected in databases located on a secure server. The databases are protected by passwords and other technical means. The passwords required to access the register shall be issued only to persons authorised to use the register.

Kotkamills may also transfer your personal data to subcontractors and service providers commissioned by Kotkamills to process personal data.

#### 5 WHERE YOUR DATA IS PROCESSED

Personal data is processed within the EU and the European Economic Area. If we also use service providers located outside the EU and the European Economic Area, we will ensure an adequate level of protection of your personal data as required by data protection legislation.

#### 6 HOW LONG WE RETAIN YOUR DATA

We will only retain your personal data for as long as is necessary for the purpose of the processing. Personal data will, in principle, be kept for the duration of the visit or validity of the pass.

We may retain your personal data for longer if required by law, or if we need to retain the data for a reason such as litigation, accounting or dispute resolution.

#### 7 YOUR RIGHTS

Your rights regarding the processing of your personal data are described below. You can request to exercise your rights, preferably by sending an e-mail to the controller using the request form.

*Right to verify your personal data.* You have the right to verify the personal data we hold about you.

Right to correct your personal data. You can ask us to correct any incorrect or incomplete data about you.

Right to object to the processing of your personal data. You have the right, on the basis of your specific personal situation, to object to the processing of personal data based on our legitimate interests. We evaluate such objections on a case-by-case basis. Please note that we may have the right to process personal data for a valid reason, despite your objections.

Right to restrict processing. In certain situations, you have the right to ask us to restrict the processing of your personal data, in which case we may only process your personal data with your consent, or for certain limited uses. You have the right to request a restriction on processing if the data we process is incorrect, processed unlawfully or unnecessarily, or if you have objected to the processing of your personal data.

Right to delete data. You have the right to ask us to delete data about you. We will process the deletion request, after which we will either delete the data or state a valid reason why the data cannot be deleted. Please note that we may have a statutory or other right not to delete the data you have requested.

Please contact us if you have any questions regarding the processing of your personal data or the exercise of your rights. We strive to resolve all issues related to the processing of your personal data with you personally. However, you can always file a complaint with the Data Protection Ombudsman if you feel that we are in breach of applicable data protection laws when processing personal data.

Contact details of the Data Protection Ombudsman: [www.tieto-suojafi.fi/index/yhteystiedot.html](http://www.tieto-suojafi.fi/index/yhteystiedot.html)

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### CHANGES TO OUR PRIVACY POLICY

We update our Privacy Policy from time to time, for example with changes in our operations or in the related legislation.