

MM Kotkamills Oy

## **PRIVACY POLICY**

Your privacy is important to us. MM Kotkamills Oy and its subsidiaries (“MM Kotkamills”, “the Company” or “the Controller”) undertake to protect your privacy and comply with the legislation on the processing of personal data and data protection when you communicate with MM Kotkamills or visit the buildings or mill area managed by MM Kotkamills. MM 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, please don’t hesitate to contact MM Kotkamills using the contact details below. You will also find information below on how to exercise your rights with respect to the processing of your personal data.

### 1

#### CONTROLLER’S CONTACT INFORMATION

The Controller of the personal data processed is MM Kotkamills Oy and each of its subsidiaries as regards their visitors and those moving in the subsidiary’s area (hereinafter referred to as “we”, “MM Kotkamills”, “the Company” or “the Controller”).

Our contact information as regards matters concerning the processing of personal data in relation to area security:

*Safety Manager Ari Siekkinen  
ari.siekkinen@mm.group*

### 2

#### FOR WHAT PURPOSES DO WE USE YOUR DATA?

The purpose of our processing of your personal data is to document and maintain information about the people and vehicles moving and working in the Company’s mill area, as well as their entry into and exit from the mill area. The purpose of the processing is to ensure the security of the mill area. Data collection allows us to know in real time the people who are currently in the mill area. The Company may also use personal data to alert the people working at the mill or in the mill area in the event of an accident or emergency. Additionally, the data may be used for providing information on matters relating to occupational health and safety. Access control data is used for monitoring working hours in the event that the person’s working hours are not monitored using a working time terminal, or there is some other legitimate reason for monitoring their working hours based on access control data.

Personal data collected through CCTV surveillance is processed to ensure that order and security are maintained and to investigate a

suspected or known crime, misconduct, injury or accident in the area. Surveillance of the mill area is the responsibility of the Company's surveillance and security services. We have placed signs about the CCTV surveillance at the entrances to the area.

Our data processing is based on our legitimate interest in managing our relationships with our personnel, customers and partners and our other stakeholder connections. We may process personal data in order to fulfil our legal obligations, such as responding to relevant authorities and in connection with legal claims. In the case of CCTV surveillance, our legitimate interest is first and foremost one of the following:

- Ensuring the general safety of the properties, personnel and visitors, as well as order in the area and protecting the company's assets.

### 3

#### WHAT INFORMATION DO WE COLLECT ABOUT YOU?

The majority of the personal data collected in the data file is information you have directly provided MM Kotkamills with when applying for an access pass to the mill or reporting as a visitor on your arrival.

The personal data we process consists mainly of information you yourself have provided us with. The data is stored in an automated access control and visitor management system based on information entered by the guests themselves and on advance notices made by the personnel. The types of personal data we may process are listed below. Only personal data that is necessary for the implementation of the uses described above is entered in the access control and visitor location register. MM Kotkamills processes the following information:

#### Contact details and personal data

- First and last name
- Nationality (in the case of foreign employees, a copy of their passport, an A1 certificate, residence/work permit/copy of their visa)
- The required work permit information (hot work card, occupational safety card)
- Address, postal code, city, email address
- Company and business ID
- Identification data (date of birth, tax number, vehicle registration number)
- Photograph of the person
- Telephone number for work purposes
- Country
- Additional information provided by the visitor

#### Information about the visit

**PRIVACY POLICY  
AREA SECURITY DATA FILE**



- Date and time of the visit
- CCTV footage from the time of the visit

The company stores the data of the CCTV footage recording separately from other data.

Security surveillance of the area is carried out using a recording CCTV system. The CCTV footage contains information about the people and vehicles moving in the surveillance area covered by the cameras. In addition to video, the date and time of the events are recorded.

#### 4

#### WHO DO WE SHARE YOUR INFORMATION WITH?

As a rule, we do not disclose your data to third parties. However, we may disclose personal data to the authorities in order to comply with our legal obligations. Information may be disclosed within our Group and when our legal obligations so require. Any disclosures made are always made in accordance with the data protection legislation. Kotkamills uses service providers that process personal data on the Company's behalf, and personal data is transferred to them for this purpose.

As a result of the technical implementation of data processing, some of the data may be physically located on the external subcontractor's server, where it is processed by means of a technical access connection. The data is collected in databases located on a secure server. The databases are protected with passwords and other technical measures. The passwords required for the use of the data file are only granted to persons authorized to use it.

The Company may transfer your personal data to subcontractors and service providers who perform personal data processing activities by order of the Company. The Company may share personal data with third parties that provide services to the Company. These third-party companies are contractually committed to using the personal data disclosed to them only for the purpose of performing their contractual services.

#### 5

#### WHERE IS YOUR DATA PROCESSED?

Your personal data is processed within the EU and the European Economic Area. If we decided to also use service providers located outside the EU and the European Economic Area, we would ensure an adequate level of data protection was in place to protect your personal data as required by the data protection legislation.

## 6 HOW LONG DO WE STORE YOUR DATA?

We store your personal data only for as long as is necessary for the purpose of the processing. As a rule, personal data is stored for the duration of the visit or the period of validity of the access pass.

We may store your personal data for longer than this if required by law, or if we need to store the data for reasons such as the processing of legal claims, accounting or arbitration. Recordings of CCTV footage are stored according to recording capacity.

## 7 WHAT ARE YOUR RIGHTS?

Your rights related to the processing of your personal data are described below. You can make a request to exercise your rights, preferably by sending an email to the Controller using the form below.

*The right to check your personal data.* You have the right to check the personal data concerning yourself that we have stored.

*The right to rectification.* You may ask us to rectify any incorrect or incomplete information about yourself.

*The right to object to the processing of your personal data.* You have the right to object to the processing of your personal data, which we carry out based on our legitimate interest, on grounds related to your specific personal situation. We assess such requests on a case-by-case basis. Please note that, despite your objections, we may have the right to process personal data for justified reasons.

*The right to restriction of processing.* In certain situations, you have the right to ask us to restrict our processing of your personal data. In such cases, we can process your personal data only with your consent or for certain limited uses. You have the right to request restriction of processing if the data we process is inaccurate, processed unlawfully or unnecessarily, or when you have objected to the processing of your personal data.

*The right to have your data erased.* You have the right to ask us to erase your data. We will process your request for erasure, after which we will either erase the data or provide you with a legitimate reason why the data cannot be erased. Please note that we may have a statutory or other right not to erase the data your request pertains to.

Please don't hesitate to contact us if you have any questions regarding the processing of your personal data or the exercise of your rights. We will strive to resolve any issues related to the processing of your

personal data with you in person. However, you have the right to lodge a complaint with the Data Protection Ombudsman if you feel that we are in breach of the data protection legislation in force when processing personal data. The Data Protection Ombudsman's contact details: [www.tietosuoja.fi/fi/index/yhteystiedot.html](http://www.tietosuoja.fi/fi/index/yhteystiedot.html)

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### CHANGES TO OUR PRIVACY POLICY

We update our Privacy Policy from time to time; for example, when our operations or the relevant legislation change.