



1 Controller	Name Real estate company Kiinteistö Oy Espoon Revontulentie 7 (c/o Newsec Asset Management Oy)
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. daytime phone number, email address) Phone +358 20 703 50
2 Contact person in matters related to the filing system	Name Pirita Rintala (Newsec)
	Address Revontulentie 7, 02100 Espoo
	Other contact information (e.g. daytime phone number, email address) Phone +358 40 651 6325, email Pirita.Rintala@newsec.fi
3 Name of the filing system	Filing system for camera surveillance
4 Purpose of and legal basis for the processing of personal data	<p>The processing of personal data is based on the legitimate interest of the controller and personal data is collected at the premises of Elo Mutual Pension Insurance Company, located at Revontulentie 7, for the purpose of protecting the property and preventing and detecting of situations where personal safety and property may be at risk, of vandalism and crimes, as well as for the personal safety of the employees and other persons at the premises, as detailed in the Act on the Protection of Privacy in Working Life.</p> <p>The public is notified of the surveillance with visible notices.</p> <p>The surveillance camera services (Prevent 360 Turvallisuuspalvelut Oy) and the main user of the system (AccessPoint Oy) are outsourced.</p>
5 Data content of the filing system	<p>The categories of data subjects and the data types applicable to data subjects:</p> <p>The categories of data subjects are:</p> <ul style="list-style-type: none">- persons working and visiting the premises and the building of Elo at Revontulentie 7 <p>The data types concerning data subjects include the following:</p> <ul style="list-style-type: none">- CCTV camera recording- Time of recording- Place of recording
6 Sources of personal data	No external sources of data in regular use.
7	The real estate company discloses personal data only with the data subject's consent or in the event that the transferee is entitled to receive the information based on legislation.



Recipients of personal data and categories of recipients	The real estate company uses the following service providers in the processing of personal data: Camera surveillance: Prevent 360 Turvallisuuspalvelut Oy System main user: AccessPoint Oy
8 Transfers of data to countries outside the EU or EEA	Data is not transferred to countries outside the EU or EEA.
9 Principles concerning the protection of personal data	<p><i>A Material that is processed manually</i></p> <p><i>Manual material is protected by means of guarding, locking and access control.</i></p> <p><i>B Data that is processed automatically</i></p> <ol style="list-style-type: none">1. Users are identified before they can access the service and the data in the filing system.2. The access rights of users are limited in the filing system to data that the user is authorised to access with the data owner's authorisation.3. The representatives the real estate company are authorised to access the data in the filing system if the person's work responsibilities include the processing of the data stored in the filing system.4. The representatives of the real estate company are subject to a statutory obligation of secrecy, and they have signed a written non-disclosure agreement.5. The real estate company may use external service providers to provide the services, as defined in this privacy statement. The same obligations of secrecy and non-disclosure that apply to the employees of the real estate company also apply to the service providers.6. Encryption is used to protect data transfers in public networks.7. The availability of the service and the filing system data is ensured and monitored regarding data, equipment and equipment premises.8. Access to equipment premises and equipment is restricted to persons whose work responsibilities include tasks related to the equipment premises or equipment.9. The accuracy of the software used for the service is monitored.10. Regarding the service providers responsible for data processing tasks, the following data protection principles are applied:<ul style="list-style-type: none">- The processing of data is based on contracts or access rights granted and monitored by the real estate company.- Data connections are protected from external access; data encryption is applied in public networks.- The real estate company's equipment on which data is stored is maintained and protected by a service provider or hosting service provider.
10 Retention period of personal data	Personal data is retained depending on the storage capacity and overriding function of the system, and no longer than 6 (six) months
11 Right to check personal data	Data subjects have the right to check their own data stored in the filing system. Requests concerning the checking of data must be submitted in writing or by visiting Elo in person. Requests concerning the checking of data must be addressed to the contact person defined in this privacy statement.



12 Right to rectification	<p>Data subjects have the right to demand that incorrect or erroneous data is rectified or completed.</p> <p>Requests concerning the rectification of data must be presented in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>
13 Right to erasure	<p>Data Subjects have the right to demand that personal data is erased within the limits of and in accordance with the applicable data protection legislation, for example, if the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.</p> <p>Regarding personal data that has been collected with the Data Subject's consent, the Data Subject has the right to demand that data is erased, for example, if the Data Subject withdraws his or her consent to the processing and there are no other legal grounds for the processing.</p> <p>Requests concerning the erasure of data must be presented in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>
14 Right to restriction of processing	<p>Data Subjects have the right to restrict the processing of personal data within the limits of and in accordance with the applicable data protection legislation.</p> <p>Requests concerning the restriction of processing must be presented in writing, either in electronic format or manually. Requests must be addressed to the contact person defined in this privacy statement.</p>
15 Right to data portability	<p>The data may not be transferred to another system.</p>
16 Right to object	<p>Data subjects have no right to object to the processing of personal data.</p>
17 Other rights related to the processing of personal data	<p>Data Subjects always have the right to lodge a complaint with a supervisory authority if, in the Data Subject's opinion, his or her personal data has been processed contrary to the provisions of the General Data Protection Regulation.</p> <p>If the Data Subject is of the opinion that his or her legal rights have been violated, the Data Subject has the right to lodge a complaint with the national data protection authority (in Finland, the Data Protection Ombudsman: http://www.tietosuoja.fi) or other data protection authority in the European Union or European Economic Area.</p> <p>The requests made by Data Subjects concerning the exercising of their rights must be addressed to the data protection officer responsible for this filing system. The contact details are provided in section 2 of this privacy statement. Requests can be submitted via encrypted email or by letter. The request must identify the requester (name, personal identification number), the scope of the request and the actions required to be taken.</p> <p>Any communication and actions taken based on requests made by the Data Subject are primarily provided free of charge, unless the requests are manifestly unfounded, excessive or recurring. In that case, Elo can also refuse to act on the request.</p>