

<b>1</b> <b>Filing system</b>	<b>Patria Oyj Camera Surveillance Systems</b>
<b>2</b> <b>Controller</b>	<p>Name Patria Oyj</p> <p>Address Arkadiankatu 2 FI-00100 Helsinki, Finland</p> <p>Other contact information (e.g. telephone during office hours, email address) info@patriagroup.com</p>
<b>3</b> <b>Data protection officer / contact person in matters relating to the filing system</b>	<p>Name Ara Haikarainen</p> <p>Address Arkadiankatu 2 FI-00100 Helsinki, Finland</p> <p>Other contact information (e.g. email address, telephone during office hours) info@patriagroup.com</p>
<b>4</b> <b>Purpose of processing personal data, legal basis for processing and information on the source of the personal data</b>	<p>Patria's premises and its managed properties are controlled by a camera surveillance system which stores personal information in the register described in this privacy notice.</p> <p>The registers contain both public and internal information.</p> <p>Personal data processing purposes, legal criteria and data collection:</p> <p><b>1. Registry of Camera Surveillance</b></p> <p><b>Criterion:</b> Processing is necessary to comply with the statutory obligation of the controller.</p> <p><b>Purpose of the registry:</b> Personal data contained in the register may be used for the following purposes:</p> <ol style="list-style-type: none"> <li>1. Access control to allow Patria employees and stakeholders safety can be ensured</li> <li>2. Identification of persons and vehicles</li> <li>3. To provide legal protection for employees</li> <li>4. To protect the information and property of the employer, employees, and customers</li> <li>5. Prevention and clarify crimes</li> <li>6. Proper operation of the production process to monitor</li> <li>7. Prevention and clarify situations that jeopardize safety, property, or production process</li> <li>8. Prevention and clarification of injury cases and accidents</li> <li>9. Monitoring and improving the customer experience</li> <li>10. For statistical purposes</li> <li>11. Fulfilment of regulatory obligations</li> <li>12. Prevention of abuse</li> </ol> <p><b>Information collected:</b> Information obtained directly from the organization's system</p>

26.10.2021

<p><b>5</b> <b>Description of the categories of data subjects and categories of personal data</b></p>	<p>The following personal data is collected:</p> <p><b>1. Registry of Camera Surveillance</b></p> <p><b>Registered are:</b> People who are located or moving in areas with a camera in the premises of Patria and in the premises managed by Patria.</p> <p><b>The following information is stored about those registered:</b> Analog or digital image, information about the surveillance area being filmed, date and time of events in the picture. The speech of persons is not recorded.</p>
<p><b>6</b> <b>Legitimate interests of the controller or a third party</b></p>	<p>Article 6(1)(f) of the EU General Data Protection Regulation (GDPR) (legitimate interest of the controller) is not applied to the processing of data performed by public authorities in the course of their duties. In this context, Patria can be interpreted as an authority or similar body.</p> <p>The need will be assessed on a case-by-case basis.</p> <p>Balance test done (available only in Finnish)</p>
<p><b>7</b> <b>Recipients and disclosure of personal data</b></p>	<p>As a broad interpretation of Article 4(9) of the GDPR, the parties (processors/recipients of personal data) to which Patria as a controller transfers personal data for processing (for example, in the context of performing maintenance tasks via a technical interface) are listed below.</p> <p>Personal data contained in corporate security identity registers will be provided, if necessary, to persons in corporate security of Patria and to personnel of Patria in need-to-know basis.</p> <p>Access to the personal data in this filing system will be granted to the system supplier (private-sector system supplier(s)) as necessary for investigating any technical hardware or software failure.</p> <p>In addition, data in the Patria Camera Surveillance Systems is disclosed as necessary:</p> <ol style="list-style-type: none"><li>1) for executing orders issued by the authorities, to the authority requesting the data;</li><li>2) to the suppliers of information systems, tools and equipment required for various tasks and to the suppliers in charge of identity and access management;</li><li>3) to suppliers investigating security incidents or nonconformities;</li><li>4) to attorneys and law firms providing legal services;</li><li>5) courts.</li></ol>
<p><b>8</b> <b>Transfer of personal data to a third country or an international organisation</b></p>	<p>According to Article 45(1) of the GDPR, the transfer of personal data to a third country or an international organisation may take place where the Commission has decided that the third country, a territory or one or more specified sectors within that</p>

	<p>third country, or the international organisation in question ensures an adequate level of protection. Such a transfer does not require any specific authorisation.</p> <p>The personal data in Patria's Corporate Security filing system may be transferred outside the EU/ETA on the following conditions:</p> <ul style="list-style-type: none"> <li>- <b>In accordance with Article 46 of the GDPR:</b> Transfers (of personal data) subject to appropriate safeguards. Data will not be disclosed outside the EU, European Economic Area or countries decided by the Commission to provide an adequate level of protection unless an adequate level of protection is ensured through contracts or otherwise as required by law.</li> </ul>												
<p><b>9</b> <b>Data retention period</b></p>	<p>Data collected in Camera Surveillance System will only be stored for as long as and to the extent necessary in relation to the original and compatible purposes for which the personal data was collected.</p> <p>Data will be deleted from system as follows:</p> <p><b>1. Registry of Camera Surveillance</b> There is no retention time provided for the camera recording but is determined by the mass memory capacity of the recorder, so that the recording is overwritten from the older material. For this reason, the storage time of the camera recordings varies between 2 weeks and 2 years.</p>												
<p><b>10</b> <b>Principles of data protection; description of technical and organisational security measures</b></p>	<p>Personal data will remain confidential. Patria Oyj's ICT network or server environment or the cloud services in which the filing systems are located are protected by the necessary technical and organisational measures.</p>												
<p><b>11</b> <b>Rights of the data subject</b></p>	<p>Data subjects have right of access to any personal data stored on them in the filing systems. According to the GDPR, the controller must reply to the data subject's request to exercise their rights within one month of receipt of the request.</p> <p>All requests should be sent in writing to one of the following Patria offices. The data subject must prove their identity when requesting access or rectification.</p> <table border="1" data-bbox="480 1615 1476 1955"> <thead> <tr> <th>Country</th> <th>Patria premises</th> <th>Opening hours</th> </tr> </thead> <tbody> <tr> <td>Finland</td> <td>Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli</td> <td>Mon–Fri at 8-16</td> </tr> <tr> <td>Estonia</td> <td>Betooni 6a, Tallinn</td> <td>Requires an appointment – contact to info@patriagroup.com</td> </tr> <tr> <td>Sweden</td> <td>Helikoptervägen 1, Stockholm-Arlanda</td> <td>Requires an appointment – contact to info@patriagroup.com</td> </tr> </tbody> </table>	Country	Patria premises	Opening hours	Finland	Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli	Mon–Fri at 8-16	Estonia	Betooni 6a, Tallinn	Requires an appointment – contact to info@patriagroup.com	Sweden	Helikoptervägen 1, Stockholm-Arlanda	Requires an appointment – contact to info@patriagroup.com
Country	Patria premises	Opening hours											
Finland	Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli	Mon–Fri at 8-16											
Estonia	Betooni 6a, Tallinn	Requires an appointment – contact to info@patriagroup.com											
Sweden	Helikoptervägen 1, Stockholm-Arlanda	Requires an appointment – contact to info@patriagroup.com											

26.10.2021

	<p><b>A. Right of access to personal data</b></p> <p>Data subjects have right of access to any personal data stored on them in Patria's personal data filing system.</p> <p>Opening hours: Mon–Thu from 8 a.m. to 4 p.m.</p> <p><b>B. Right to rectification and restriction of processing</b></p> <p>Data subjects have the right to require the controller to rectify inaccurate and incorrect personal data concerning them.</p> <p>Data subjects have the right to restrict processing by Patria as the controller of this filing system where one of the following applies:</p> <ul style="list-style-type: none"><li>- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;</li><li>- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;</li><li>- the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims;</li><li>- the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.</li></ul> <p>The request to rectify or restrict the processing of personal data in Patria's filing system should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when making the request for rectification or restriction.</p> <p><b>C. Right to erasure</b></p> <p>Data subjects have the right to have the personal data concerning them erased from filing system without undue delay where one of the following grounds applies:</p> <ul style="list-style-type: none"><li>- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;</li><li>- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;</li><li>- the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);</li><li>- the personal data has been unlawfully processed;</li><li>- the personal data has to be erased to comply with a legal obligation in European Union or national law.</li></ul> <p>The request to erase personal data should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when requesting access or rectification.</p>
<p><b>12</b> <b>Right to object</b></p>	<p>According to Article 21 of the GDPR, data subjects have the right to object, on grounds relating to their particular situation, to the processing of personal data</p>

	<p>concerning them which is based on Article 6(1)(e) (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller), including profiling based on those provisions. The controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</p> <p>The processing objection request should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when requesting access or rectification.</p>								
<b>13 Data portability</b>	<p>Once the data subject has provided Patria with the personal data concerning them in a structured, commonly used and machine-readable format, they have the right to have that data transmitted to another controller when:</p> <ul style="list-style-type: none"><li>a) the processing is based on the data subject's consent or on a contract between the controller and data subject; and</li><li>b) the processing is carried out by automated means; and</li><li>c) the transfer is technically feasible.</li></ul>								
<b>14 Right to withdraw consent</b>	Not applicable.								
<b>15 Right to complain to the supervisory authority</b>	<p>Data subjects have the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data concerning them infringes the applicable data protection regulations.</p> <table border="1"><thead><tr><th>Country</th><th>Contact info</th></tr></thead><tbody><tr><td>Finland</td><td>The Office of the Data Protection Ombudsman Finland Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Telephone: + 358 29 566 6700 Email: tietosuoja@om.fi</td></tr><tr><td>Estonia</td><td>Estonian Data Protection Inspectorate Address: 39 Tatari St., 10134 Tallinn telephone (from abroad add +372) 627 4135 e-mail: info@aki.ee</td></tr><tr><td>Sweden</td><td>Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Phone number: +46 (0)8 657 61 00 E-mail: imy@imy.se</td></tr></tbody></table>	Country	Contact info	Finland	The Office of the Data Protection Ombudsman Finland Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Telephone: + 358 29 566 6700 Email: tietosuoja@om.fi	Estonia	Estonian Data Protection Inspectorate Address: 39 Tatari St., 10134 Tallinn telephone (from abroad add +372) 627 4135 e-mail: info@aki.ee	Sweden	Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Phone number: +46 (0)8 657 61 00 E-mail: imy@imy.se
Country	Contact info								
Finland	The Office of the Data Protection Ombudsman Finland Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Telephone: + 358 29 566 6700 Email: tietosuoja@om.fi								
Estonia	Estonian Data Protection Inspectorate Address: 39 Tatari St., 10134 Tallinn telephone (from abroad add +372) 627 4135 e-mail: info@aki.ee								
Sweden	Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Phone number: +46 (0)8 657 61 00 E-mail: imy@imy.se								
<b>16 Automated decision-making and profiling</b>	The personal data in the filing system will not be used for automated decision-making or profiling.								
<b>17 Additional information</b>	We reserve the right to update this Privacy Notice.								



## PRIVACY NOTICE

EU General Data Protection Regulation (GDPR)  
(679/2016), Articles 12–14 and Data Protection Act  
(1050/2018)

**26.10.2021**

<b>18 Updates</b>	The document was last updated on 26.10.2021
<b>19 Appendices</b>	Balance test and DPIA (available only in Finnish)