

1 Filing system	Patria Corporate Security – Visitor Registry
2 Controller	<p>Name Patria Oyj</p> <hr/> <p>Address Arkadiankatu 2 FI-00100 Helsinki, Finland</p> <hr/> <p>Other contact information (e.g. telephone during office hours, email address) info@patriagroup.com</p>
3 Data protection officer / contact person in matters relating to the filing system	<p>Name Ara Haikarainen</p> <hr/> <p>Address Arkadiankatu 2 FI-00100 Helsinki, Finland</p> <hr/> <p>Other contact information (e.g. email address, telephone during office hours) info@patriagroup.com</p>
4 Purpose of processing personal data, legal basis for processing and information on the source of the personal data	<p>The purpose of Patria's Corporate Security Visitor Registry is to administer the personal and corporate security obligations of the Patria Group and businesses. The register maintains information on persons visiting the premises of Patria and maintains measures related to visits. The register contains both public and internal information.</p> <p>Personal data processing purposes, legal processing criteria and data collection:</p> <p style="text-align: center;">1. Visitor Registry</p> <p>Processing criterion:</p> <ul style="list-style-type: none"> a) processing is necessary for the implementation of a contract to which the data subject is a party or for the implementation of pre-conclusion measures at the request of the data subject and/or b) Processing is necessary to comply with the controller's statutory obligation and/or c) processing is necessary to establish the legitimate interests of the controller <p>The purpose of the registry:</p> <p>Personal data contained in the register may be used:</p> <ul style="list-style-type: none"> 1. Identification and certification of persons 2. To guarantee legal protection for visitors 3. Prevention and clarification of crimes 4. Prevention and clarification of situations that endanger safety 5. Prevention and Clearance of Injury Cases and Accidents 6. To fulfil the obligations of the authority 7. To prevent abuse <p>Data collected: Data obtained directly from the data subject</p>

26.10.2021

5 Description of the categories of data subjects and categories of personal data	The following personal data is collected for this filing system: 1. Visitor Registry Those registered are: Persons visiting the premises of Patria For those registered, the following information is stored: first name, surname, identification number, date of visit, host of visit and contact details.
6 Legitimate interests of the controller or a third party	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.
7 Recipients and disclosure of personal data	In broad interpretation of Article 4.9 of the EU Data Protection Regulation, the parties (processors/recipients of personal data) to whom Patria, as controller, “transfers for processing” (e.g., using a technical interface in the event of performance of maintenance tasks) are listed next. In addition, the personal data of the Visitor Register for Business Security will be released as appropriate: <ol style="list-style-type: none">1. the authority that required them in the implementation of the regulatory provisions2. legal and law firms supplying legal services3. for the courts
8 Transfer of personal data to a third country or an international organisation	Pursuant to Article 45, (1) of the EU Data Protection Regulation, the transfer of personal data to a third country or international organisation may be carried out where the Commission has decided that the third country or third country region or one or more specific sectors or that international the organisation ensures an adequate level of data protection. No special permission is required for such a move. For this personal register, personal data may be transferred outside the EU/EEA under the following conditions: <ul style="list-style-type: none">• Pursuant to Article 46 of the EU Data Protection Regulation: transfer of (personal data) using appropriate safeguards. Data shall not be released outside the EU, European Economic Area or countries of sufficient level of data protection as found by the European Commission unless adequate levels of data protection have been ensured by agreement or otherwise required by law.
9 Data retention period	Data collected in the Visitor Register of Corporate Security will be kept only for as long as necessary in relation to the original or compatible purposes for which the personal data has been collected.

	<p>The personal data shall be deleted from the identity register as follows</p> <p>1. Visitor Registry</p> <p>The retention period of personal data is two (2) years from the end of the date of the visit.</p>
<p>10 Principles of data protection; description of technical and organisational security measures</p>	<p>Personal data will be kept confidential. Patria Corporation's facilities, data network or server environment in which the registry is located are protected by firewall and other necessary technical and physical measures.</p>
<p>11 Rights of the data subject</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>A. Right of access to personal data</p> <p>Data subjects have right of access to any personal data stored on them in Patria's Corporate Security personal data filing system. The request to access or rectify 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>Opening hours: Mon–Thu from 8 a.m. to 4 p.m.</p> <p>B. Right to rectification and restriction of processing</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"> - 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; - the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead; - 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; - 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. <p>The request to rectify or restrict the processing of personal data in Patria's Corporate Security 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>C. Right to erasure</p> <p>Data subjects have the right to have the personal data concerning them erased from Patria's Corporate Security filing system without undue delay where one of the following grounds applies:</p> <ul style="list-style-type: none">- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;- 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);- the personal data has been unlawfully processed;- the personal data has to be erased to comply with a legal obligation in Union or national law. <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>
12 Right to object	<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 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>
13 Data portability	<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">a) the processing is based on the data subject's consent or on a contract between the controller and data subject; andb) the processing is carried out by automated means; andc) the transfer is technically feasible.
14 Right to withdraw consent	<p>Not applicable.</p>
15 Right to complain to the supervisory authority	<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>

26.10.2021

	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
16 Automated decision-making and profiling	The personal data in the filing system will not be used for automated decision-making or profiling.	
17 Additional information	We reserve the right to update this Privacy Notice.	
18 Updates	The document was last updated on 26.10.2021	
19 Appendices	Balance test available only in Finnish.	