

## Privacy statement

Created on 28 January 2019

### 1. Controller

Users of the property of Kiinteistö Oy Helsingin Lepakko utilize a visitor management system for the management of information on visitors at the property. Users of the property act as the controllers of personal data processed in the system with regard to personal data related to their respective activities. This privacy statement describes the processing of personal data in the visitor system by the following users of the property:

Innovation Funding Agency Business Finland, business ID 0512696-4  
Business Finland Oy, business ID: 2725690-3  
Porkkalankatu 1, PO Box 69, FI-00101 Helsinki  
tel. +358 29 505 5000

### 2. Contact person for matters related to the register

[dataprotection@businessfinland.fi](mailto:dataprotection@businessfinland.fi)

### 3. Name of filing system

Privacy statement for the personal data filing system of Kiinteistö Oy Helsingin Lepakko visitor management system

### 4. Purpose and legal basis of personal data processing

Personal data in the visitor management system are processed for the purposes of managing visitations, provision of their related services, and implementation of procedures to ensure the security of facilities, including

- Management of notifications related to visitations, such as arrival information
- Management of facility and catering arrangements related to visitations
- Management of procedures related to the security of facilities

The legal basis for processing personal data is the controller's legitimate interest.

Processing tasks may be outsourced to the controller's third-party service providers, as provided for in and in compliance with data protection legislation.

### 5. Data content of the filing system

Categories of data subjects in the filing system:

- Organizers of visitations
- Visitors at the property

Personal data of organizers and visitors stored in the filing system include the following:

- first and last name
- telephone number and email address
- company and position in the company
- date and time of visit, meeting room used if applicable

Photos taken upon registration are not stored in the visitor management system

### 6. Retention period of personal data

Visitor information older than 12 months are erased from the system automatically.

## **7. Regular sources of data**

The system collects data from

- the information systems of users of the property, and
- data subjects themselves via a self-service terminal

## **8. Regular disclosures of data and groups of recipients**

Personal data are disclosed from the system only on the basis of statutory rights to obtain information and rights and responsibilities for the disclosure of information. Under special circumstances, personal data may also be disclosed with the data subject's consent.

The processing of personal data required by service providers for the performance of their duties in connection with the provision of services related to visitations is always based on commission contracts and guidelines that specify the rights and responsibilities of parties in the processing and safeguarding of personal data.

## **9. Principles of protection of the filing system**

Security of the system is ensured by means of organizational, operational and technical measures. The physical servers are maintained in Finland at a data center managed by a third party. The cloud service is produced from the data center, which has been designed to be fault tolerant and withstand cyberattacks. The visitor management system server employs the latest operating system updates, antivirus protection and rigorous practices and restrictions on establishing a connection. Communications security has been implemented by means of TLS v1.2 technology.

## **10. Data subjects' right to object to processing**

On the grounds of special personal circumstances, data subjects have the right to object to processing activities by the controller insofar as the basis for processing is the pursuit of the controller's legitimate interests.

Data subjects may file an objection to processing in accordance with Section 12 of this privacy statement. In the objection, the data subject must specify the special circumstances under which they object to processing. The controller may refuse to comply with the objection to processing on legal grounds.

## **11. Other rights of the data subject related to personal data processing**

### **Data subject's right to access data (right of inspection)**

A data subject is entitled to inspect what personal data has been stored in a register. An inspection request must be submitted as instructed in this privacy statement. The right of inspection may be declined on legal grounds. In principle, using the right of inspection is free of charge.

### **Data subject's right to request data to be corrected, removed or its processing to be limited**

Insofar as a data subject may act independently, they must without undue delay after being notified of an error, or after having detected an error, rectify, remove or supplement the inaccurate, unnecessary, insufficient or outdated data in the filing system, or data that is contrary to the purpose of the filing system.

As a rule, rectifications of personal data are made while in the e-identification service environment

If a data subject is unable to correct the information themselves, a request for correction must be submitted in accordance with Section 12 of this privacy statement.

A data subject may also request that the controller limit the processing of their personal data if the data subject is awaiting a response from the controller to a request to correct or remove information, for example.

### **Data subject's right to file a complaint with the supervisory authority**

A data subject is entitled to file a complaint with a competent supervisory authority if a register controller has not followed the applicable data protection regulation in its operations.

### **12. Contacts**

Data subjects should contact the register controller with any questions related to personal data processing and exercising their rights. Data subjects may exercise their rights by contacting [dataprotection@businessfinland.fi](mailto:dataprotection@businessfinland.fi)