

## Privacy Notice – video surveillance

Citycon Oyj and its subsidiaries and other affiliates (later referred to as “Citycon”) respect the privacy of its customers. This privacy notice (later referred to as “Privacy Notice”) describes how Citycon collects and processes personal data of its customers and how Citycon ensures the privacy and security of information collected and processed by it.

In this Privacy Notice “personal data” means any information that can identify you as an individual either submitted by you and/or obtained through alternative channels.

### Data Controller

KOy Myyrmanni  
Business ID: 0362836-2  
Phone: +358 207 664 601

### Purposes and legal basis for processing

The video surveillance system is used to monitor the shopping centre properties as well as their outside areas, such as entrance, waste disposal and parking areas. We process personal data of people passing the camera surveillance area to protect our property, to prevent and solve misuse and crime. The purpose of the surveillance is also to ensure and increase the security of our customers, and shopping centres.

Processing personal data is based on a legitimate interest. The processing of personal data is permitted when it is necessary to realise the legitimate interests of the controller or a third party. We consider the processing of personal data for the processing purposes specified above to be necessary to the protection of Citycon’s property and safeguarding the personal safety of our customers and personnel, and these same interests cannot be effectively protected by means of other, less stringent measures.

### Personal data we collect

Image material (without audio) transmitted by the surveillance cameras showing people passing the camera surveillance area. In addition, the date and time are recorded in the register.

### Where we collect the personal data from

The personal data is recorded and transmitted by the cameras.

We inform of the recorded camera surveillance with "Recorded camera surveillance" signs and/or labels posted at each entrance to the shopping centre.

### Disclosure of personal data and categories of recipients of the data

As a rule, no data are disclosed from the register to anyone. The data can only be disclosed within the limits that the legislation in effect will oblige and permit.

Personal data may be processed by Citycon employees whose job description includes dealing with criminal matters or damage to the shopping centre as well as the security guards employed by the security company to which the security of the shopping centre has been outsourced and employees employed by the company which is responsible of the video surveillance system's maintenance. Personal data may also be processed by Citycon employees whose job description includes the maintenance and development of the camera surveillance system.

The data can be disclosed to the police or other competent authorities for criminal investigation, always based on a specified request from the authority. Personal data is also transferred to insurance companies for the purpose of processing and resolving insurance claims.

### Transfer of personal data outside EU/EEA

Personal data is not transferred outside of the EU or EEA.

### Do we conduct profiling?

We do not use your personal data for profiling.

### Retention time

Citycon stores camera recordings for thirty (30) days after the moment of recording. After this time has passed, the recordings are automatically destroyed. Recordings may be stored for a longer period if they are required for investigating a crime or damage case. Even in such cases, the recordings will be destroyed when they are no longer needed and at the latest after one year.

[We have decided to retain the surveillance footage for thirty (30) days because many criminal matters and damage cases do not immediately come to our attention. For example, it may take several days before we are requested for the footage by the police. We want to ensure that we can use our camera surveillance in accordance with our stated purposes.]

### Data protection

Citycon has taken appropriate technical and organizational measures to restrict access to the personal data it holds and to protect it against loss, accidental destruction, misuse, and unlawful alteration. Access to personal data is restricted on a need-to-know basis to individuals (Citycon's employees and service providers) who need to access the data for the purposes it was collected for.

### What are your rights

You have the right to check what personal data has been stored into the registered about you and to demand that any incorrect, out-of-date or unlawful data is corrected or deleted. In this case we require that you identify the time and place from where you are requesting the recording. You also have the right to request that processing be restricted on the grounds provided by law.

You are entitled to lodge a complaint with the competent supervisory authority if you are of the opinion that we have not complied with the data protection regulations applicable to our operations.

## How you can contact us and exercise your rights

If you have any questions concerning protection of your personal data in our data processing activities or you wish to exercise your rights, please contact Data Protection Officer Leena Rentola at

[privacy@citycon.com](mailto:privacy@citycon.com).

## Changes to Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our operations and/or applicable law. Any changes will be posted here.