

**INFORMATION DOCUMENT AND  
RECORD OF PROCESSING ACTIVITIES**

**Drafted on: 22 November 2019**  
**Updated on: 22 January 2019**

**EU General Data Protection Regulation (679/2016)**

1. Data controller	<b>Aava Medical Centre Ltd</b>
2. Person in charge of the data file and contact persons	<p>Hannele Fahlur, Unit Manager Annankatu 32, FI-00100 Helsinki, Finland tel. +358 (0)10 380 3800 (firstname.lastname@aava.fi)</p> <p>Service managers in each unit act as respective contact persons: (tel. +358 (0)10 380 3800 or firstname.lastname@aava.fi)</p> <p>Aava Medical Centre Itäkeskus, Jaana Kiema Aava Medical Centre Kamppi, Hannele Fahlur Aava Medical Centre Turku, Sanna Kurppa</p>
3. Data protection officer	<p>Ida-Emilia Laasonen Annankatu 32, FI-00100 Helsinki, Finland tel. +358 (0)10 380 3800 dpo@aava.fi</p>
4. Name of the data file	<b>Description of the data file for camera surveillance recording.</b>
5. Purpose of the processing of personal data and purpose of the data file	The purpose of camera surveillance is to protect property, prevent crimes and aid in the investigation of crimes that have already occurred. In addition, the purpose of surveillance is to ensure and increase the safety of the Medical Centres' employees, customers and guests.
6. Content of the data file	Video material is recorded in the common customer premises of Aava Medical Centres for surveillance purposes.
7. Regular sources of data	Video material transmitted by the cameras that are part of the camera surveillance system that stores the material.
8. Regular disclosure of data	Personal data may be disclosed on the basis of law. For example in cases of a suspected crime, the data may be disclosed to the police. The recording location and time will be limited to the minimum necessary for investigating the event in question. The recordings will not be disclosed to other authorities or parties.
9. Data transfers outside the EU or EEA	No data transfers outside the EU or European Economic Area.
10. Storage, filing and disposal	The data are stored for two (2) months on average. The storage period may vary as the hard drive space is filled. Recordings may be stored after the storage period has ended if it is necessary for the processing of a crime report, harassment, abuse, inappropriate behaviour, an occupational accident or occupational safety matter for which an investigation has begun before the end of the storage period.
11. Description of the principles in accordance to which the data file has been secured	The data file in digital format (on the server's hard drive) is located in a locked facility. The security company has the usernames, passwords and right to process the material. The security company can access the storage facility with a designated person. Recordings can be

	<p>viewed by the security company under the supervision/in the presence of the designated person.</p> <p>All employees sign a non-disclosure agreement at the time of signing their employment contract. The non-disclosure agreement remains valid after the termination of the employment relationship</p>
<p>12. Rights of the data subject</p>	<p>The rights of the data subject are governed by the EU General Data Protection Regulation, including:</p> <p><b>Right to gain access to the data</b>              Data subjects have the right to access their personal data. The request to access data shall be made by submitting a document that carries the person's own signature. The identity of the persons exercising their right shall be verified. The access shall be provided without unnecessary delay.</p> <p><b>Right to erasure</b>              The data subject has the right to submit a written request to Aava Medical Centre to erase any personal data concerning them from the register. The data will be erased if there are no longer any legal grounds for processing.</p> <p><b>Right to lodge a complaint with a supervisory authority</b>              The data subject has the right to lodge a complaint with a supervisory authority if they consider that the processing of their personal data infringes the General Data Protection Regulation. The supervisory authority is the Office of the Data Protection Ombudsman (Ratapihantie 9, 00520 Helsinki or tietosuoja(at)om.fi).</p>
<p>13. Notification of persons recorded in the data file</p>	<p>Persons recorded are notified by "Recording camera surveillance" signs and/or stickers visible in the recording locations.</p> <p>The description of the data file for the system is available on Aava Medical Centre's website at <a href="https://www.aava.fi/en/register-descriptions">https://www.aava.fi/en/register-descriptions</a>.</p>
<p>14. Register administration</p>	<p>This information document and record of processing activities has last been updated on 22 of January 2019. The data controller keeps track of the changes in the legislation and instructions by the authorities concerning data protection and develops the operations of the service. This requires the data controller to reserve the right to update this record.</p>