



AA Sakatti Mining Oy (AA Finland)	PRIVACY POLICY	Version 1
		Approved on 2 November 2020

AA Sakatti Mining Oy, privacy policy for video surveillance.

Privacy policy in accordance with Articles 13 and 14 of General Data Protection Regulation (EU) 2016/679.

1. Controller

Name	AA Sakatti Mining Oy
Address	Tuohiaavantie 2, FI-99600 Sodankylä
Business ID/VAT no.	FI24367683
Contact person responsible for the register	Kirsti Kulpakko
Email	kirsti.kulpakko@angloamerican.com

2. Name of register

Video surveillance system.

3. Purpose and legal basis for handling personal data

The purpose of the register and grounds for processing are as follows:

- 1. The purpose of the register and its processing is adherence to statutory obligations and legitimate interests of the controller; for assuring the safety of persons employed by the company and for visitors, and for the protection of property.
- 2. Video surveillance is conducted at the workplace and in certain demarcated areas of research sites for ensuring the personal safety of people in these areas, for monitoring the appropriate

Printed: 13/04/2021 10:37:00 Page 1 of 4





AA Sakatti Mining Oy (AA Finland)	PRIVACY POLICY	Version 1
v ±		Approved on 2 November 2020

functioning of research processes and personal safety and prevention and clarification of situations that compromise safety, property, or research processes.

3. AA Sakatti Mining Oy may process personal data and video surveillance material for the purpose of processing compensation claims and in connection with legal proceedings.

4. Information held in the register

- Material saved by the video surveillance cameras.
- Name and visitation event intervals (visitor log).
- Time data for digital images.
- Location data for digital images.
- Location data of surveillance camera.

5. Sources of information for the register

The sources of information for the register are as follows:

The manual visitor log held in the office building that is filled out by visitors.

The video surveillance system records videos and images on AA Sakatti Mining Oy's property and on authorised demarcated areas using cameras that resemble "wildlife cameras" and recording video surveillance systems

6. Protection of the register

The user interface for the access control system of the office building is protected using a username and password. Access to the physical location of the terminal device is restricted using physical locks. The saving devices for the video surveillance cameras of research areas are located in a locked cabinet. The wildlife cameras and saving devices located in the terrain are kept locked. The register (memory card) is stored within the locked wildlife camera.

The keys are only held by persons who have been authorised to process data held in the register. Data is held in the register for the time required for implementation of the study/research, however, no longer than for 90 days, unless there is a legally justifiable reason for retaining the data for a

Printed: 13/04/2021 10:37:00 Page **2** of **4**





AA Sakatti Mining Oy (AA Finland)	PRIVACY POLICY	Version 1
v ±		Approved on 2 November 2020

longer time. The information is destroyed by deleting, or when new data replaces old data. Data is used by transferring image/video material into an IT system.

7. Data disclosure

Data is not disclosed or transferred outside the European Union or European Economic Area. Data may only be disclosed to the police, or other competent authority, in cases that are separately stipulated in legislation, such as in the cases of resolving criminal acts.

8. The right to inspect and amend information

According to the General Data Protection Regulation, the data subjects held in the register are entitled to have access to what data is collected concerning him or her, and the right to demand rectification or removal of such data (we implement such requests, unless we have legal grounds for not handing over or removing the data). All requests to inspect or rectify data should be sent via email to kirsti.kulpakko@angloamerican.com. The handing over of material is done at an agreed time on the company's premises in Sodankylä and shall be done in person using verification of identity.

9. Miscellaneous rights related to the processing of personal data held in the register

Data subject rights:

- Demand the restriction of the processing of your personal data.
- Oppose to the processing of your personal data.
- Request for the transfer of submitted personal data from one controller to another.
- The right to cancel any consent you have given, if the processing of personal data is based on consent.
- Not to be subject to a decision based on automated processing or profiling.

Appealing to the supervisory authority

If a data subject feels that the processing of personal data is contrary to applied legislation, or his/her legal rights have been infringed, he/she can issue a complaint to the Data Protection Supervisor.

Printed: 13/04/2021 10:37:00 Page **3** of **4**





AA Sakatti Mining Oy (AA Finland)	PRIVACY POLICY	Version 1
		Approved on 2 November 2020

Printed: 13/04/2021 10:37:00 Page 4 of 4