



Data protection record of processing activities

Data controller	City of Lahti
Name of the register and purpose	Privacy Notice – Camera surveillance (CCTV) The City of Lahti / Palvelutori of Lahti (hereinafter referred to as <i>Palvelutori</i>) respects the privacy of its customers. This notice explains how Palvelutori collects and processes personal data and how it ensures the privacy and security of the information collected and processed. In this privacy notice, personal data refers to information through which an individual can be identified by means of camera surveillance.
Contact person for the register	Service Manager or in their absence, the Service Coordinator.
Grounds for processing and how data is collected	Processing is based on the legitimate interest of the data controller. Camera surveillance is used to monitor the public areas of Palvelutori as well as certain reservable facilities. The data is processed for protecting property, preventing and investigating misuse and criminal offences and ensuring the safety of customers and staff.
What personal data is Processed?	We record video footage captured by the CCTV system (without audio) and dates and times of recorded events. Personal data is collected through the CCTV cameras of the surveillance system.
Where Is the data stored?	Data is stored on the hard drives of the CCTV system. System administration and access rights are managed by an outsourced security service provider operating at Palvelutori under contract. Access rights are restricted to persons who require access for their duties. The system is password-protected. Authorized users may transfer and disclose recordings when necessary.
Data retention and lifecycle	Recordings are retained in the system for approximately four weeks. Older recordings are automatically overwritten when new material is recorded. Recordings are not manually deleted. If necessary, recordings may be copied to a USB memory device for the investigation of a crime or damage incident and retained for as long as required for the investigation, up to a maximum of six months. The USB device is securely erased by the contracted security service provider.

Subcontractors used in the processing of personal data	Palvelutori uses contractual partners that provide CCTV systems and maintenance services and are responsible for the operation and management of the system.
Location and transfer of personal data	Personal data is stored on an external hard drive belonging to the CCTV system in a locked facility. Remote examinations for higher education institutions may be arranged in the CCTV-monitored Niitty room. The examination recording is transferred to an external USB drive and entrusted to Lahti-Piste for storage in a locked cabinet until the educational institution's examination assessment authority informs whether the recording is required for assessment purposes or may be destroyed. The recording will be retained for a maximum of six (6) months. If the recording is not required for assessment purposes, the USB drive will be erased without viewing its contents by a Lahti-Piste employee. Personal data is not transferred outside the EU or EEA.
Disclosure of Data	Consistently personal data is not disclosed. In exceptional cases, data may be disclosed to authorities for the investigation of crimes and to insurance companies for the processing of insurance claims. Any transfer of personal data is carried out using an external USB drive protected by passwords. Remote examinations organized by educational institutions may be held in the camera-monitored room Niitty. To facilitate these examinations, rules have been agreed upon with the educational institutions whereby a recording of the examination session is transferred to an external USB drive and entrusted to Lahti-Piste for storage in a locked cabinet until the institution's designated examiner informs whether the recording needs to be reviewed or can be destroyed. If the recording is required, the USB drive is sent to the educational institution by registered mail.
Rights of the data subject	You have the right to access your personal data, request correction of inaccurate data and request deletion of your data. For enquiries, contact: tietosuoja@lahti.fi, Data Protection Officer, tel.+358 40 183 4334 You also have the right to lodge a complaint regarding the processing of personal data with the national supervisory authority.
Prepared by and date	Sanni Pietiäinen, Sevice Coordinator, 9.9.2026