

## Privacy Notice

### Video Doorbell System

Holvi Payment Services Ltd  
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Version 1.0

#### 1. Introduction

Holvi is a payment institution authorised and regulated by the Financial Supervisory Authority of Finland. With a business account, Holvi Business Mastercard®, invoicing and bookkeeping tools all in one place, Holvi eliminates the time-consuming distractions of financial admin, helping entrepreneurs to find balance in work life.

Holvi uses video doorbell systems with camera recording to assist in providing a safe and secure environment for the benefit of Holvi employees.

#### 2. Name and address of the data controller

##### 2.1. Controller

Holvi Payment Services Oy  
Business ID 2193756-4  
Kaikukatu 2 C  
00530 Helsinki  
Finland

##### 3.2. The Data Protection Officer (DPO)

The Holvi Data Protection Officer can be contacted by email at [privacy@holvi.com](mailto:privacy@holvi.com). For using the rights of the data subjects please use the online form in accordance with section 8.9.

#### 3. The purpose of processing personal data

Holvi processes personal data collected through the video doorbell system for the purposes of controlling access to the Holvi premises, ensuring the safety of Holvi staff and visitors, to protect Holvi assets and confidential information and to investigate and respond to any security incidents, vandalism, theft or unauthorised activities.

#### 4. Types of personal data and lawful bases of processing

Holvi collects information caught on the video doorbell system's camera recording (images, video and sound). The recording may include any information that the video doorbell system's camera has recorded. Typically this includes recording of the person ringing the doorbell.

Holvi relies on the following legal bases under the General Data Protection Regulation (GDPR) to process personal data collected by the video doorbell system:

Legitimate Interests (Article 6(1)(f) GDPR): We process personal data to ensure the security and safety of our premises, employees, and visitors, which constitutes a legitimate interest of our business.

Legal Obligations (Article 6(1)(c) GDPR): We may process personal data to comply with applicable laws, regulations, and legal processes.

## **5. Sources of the personal data processed**

Holvi collects personal data that is visible in the video doorbell system's camera recording. All such personal data is collected through the video doorbell system's camera and the information is not linked to any other personal data.

The video doorbell system's camera records only when movement is identified in the activity zone between 7 pm - 7 am during weekdays (Monday - Friday) and at all hours on weekends (Saturday - Sunday).

## **6. Retention of personal data**

The recordings are retained for a period of 30 days, unless a longer retention period is required by law or necessary for ongoing investigations or litigation.

## **7. Sharing of personal data with third parties**

The recordings are not shared with any third party, unless there is a specific reason to do so. Such cases may include sharing of the recording to law enforcement upon request, with third-party service providers who assist us in managing and maintaining the video doorbell system and in the event of a business transfer constituted by a merger, acquisition, or sale of all or a portion of our assets.

The recordings are stored in a cloud environment provided by Arlo (AWS). Only Holvi employees that need to access the data are granted access.

## **8. Customer's rights as a data subject**

### **8.1. The right to be informed (Art. 13 and 14 GDPR)**

Holvi will inform the persons entering the activity zone of the possibility of recording through stickers. Such stickers will inform the persons of the recording, and provide a QR code linking to this Privacy Notice.

### **8.2. The right to access (Art. 15 GDPR)**

Data subjects have the right to access the data under Article 15 of the GDPR.

### **8.3. The right to data portability (Art. 20 GDPR)**

Data subjects have under certain circumstances a right to data portability, which means that they may ask Holvi to move, copy or transfer some of their data from the Holvi IT environment to another in a structured, commonly used and machine readable form.

### **8.4. The right to rectification (Art. 16 GDPR)**

If a data subject finds their personal data processed by Holvi as inaccurate or incomplete, the data subject has a right

to get their data rectified by contacting Holvi.

#### **8.5. The right to be forgotten / the right to erasure (Art. 17 GDPR)**

Data subjects have under certain circumstances a right to be forgotten, which means that they are able to ask for the deletion and removal of all personal data Holvi has on them. If Holvi has no compelling reason for continued processing or storage, Holvi will delete customer data. Retention requirements by applicable laws might form compelling reasons for Holvi to keep the data for longer, as may Holvi's legitimate interest that overrides data subject's interest in data erasure. Holvi will respond to such requests within a month.

#### **8.6. The right to restrict processing (Art. 18 GDPR)**

In case the data subject is not entitled to get their data erased, the data subject is still able to restrict the processing of the data. Data subject has a right to restrict the processing of personal data, if 1) the accuracy of the data is contested; 2) data subject thinks the processing is unlawful and requests restriction of the processing; 3) Holvi no longer needs the data for the original purpose, but data subject's data is still required to establish, exercise or defend legal claims; or 4) if the verification of overriding basis is pending, in the context of an erasure request.

#### **8.7. The right to object processing (Art. 21 GDPR)**

The data subject has a right to object to processing of their personal data on grounds relating to their particular situation. If Holvi processes customer data for legitimate interests, Holvi will stop processing the personal data after the customer's request, unless Holvi can show compelling legitimate grounds for the processing. If Holvi processes customer data on the basis of customer consent, Holvi will stop processing customer data as soon as Holvi has received customer objections.

#### **8.8. Rights related to automated decision making including profiling (Art. 22 GDPR)**

Holvi does not use automated decision making when processing information collected through the video doorbell system.

#### **8.9. Using your rights**

Data subjects may use all of their rights through Holvi's dedicated data privacy platform by filling in and submitting an online form [here](#). We will get back to you as soon as possible, but not later than within a month.

Data subjects also have a right to lodge a complaint with a supervisory authority. Contact details of the EU data protection authorities can be viewed at: [DPA contacts list](#).

### **9. Security**

We implement appropriate technical and organisational measures to protect the information collected by the video doorbell system from unauthorised access, disclosure, alteration, and destruction.

### **10. Changes to the Privacy Policy**

Holvi will publish the newest version of this privacy notice in publicly accessible Holvi resources and will also provide a link to this privacy notice in the QR code that can be found near the video doorbell system.



**HOLVI**

Thank you for taking the time to read our Privacy Notice. Your privacy is important to us, and we are committed to protecting it.