

PRIVACY POLICY – SERVICE ROBOT TAIKA AT TRIPLA



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1. Controller

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2. What is the Tripla Service Robot and what does the Service Robot do?

Telia is testing and developing the Service Robot, and as part of this testing and development, it brings the Service Robot to Tripla to serve its visitors and to perform analytics on them. The Service Robot will be at Tripla for a testing period until the end of 2021.

The Service Robot is part of VTT's Multi-Purpose Service Robotics as Operator Business (MURO) project in which Telia participates. The purpose of this project is to reform and streamline the service robot business and to change the way service robots are sold, purchased and used.

The testing and development of the service robot is also part of the PasilaHUB project and collaboration network coordinated by Haaga-Helia University of Applied Sciences where consumer business in the Pasila region is being developed and new concepts for commerce and event businesses are created.

The Service Robot is a service package built on an autonomous mobile robot platform with the task of transporting products, serving customers and their end customers in the areas mentioned above, observing the environment, reacting to the observations, and interacting with its surroundings, and shape and object recognition and emotional analysis based on the video footage the Service Robot collects.

The Service Robot delivers hotel customer orders from the shops and restaurants at the mall and guides mall customers to the services they are looking for.

The Tripla Service Robot operates on the premises of Mall of Tripla, Original Sokos Hotel Tripla and Telia Finland Oyj.

3. Where will the Service Robot be roaming and when?

The Service Robot operates on the corridors of Mall of Tripla on floors 4 (Little Manhattan) and 2 (Nordic Avenue) and in the lifts, excluding parking garages. This area also includes the lobby, lifts and floor lobbies of Sokos Hotel Tripla. The robot will not go into the hotel's room corridors. Telia's premises are also part of these areas. The shooting area is the same as the operating environment. ATMs, pharmacies and the medical centre are not part of the Service Robot's operating environment.

The Service Robot's operating environment and travel routes are indicated by labels and in this Privacy Policy.

The Service Robot operates 24 hours a day since 6 July 2021. During July 2021, food deliveries to the hotel will take place on Tue–Sat from 12 p.m. to 8 p.m., and at other times the Service Robot will perform other tasks.

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4. How does the Service Robot collect personal data and from whom?

A video camera in the Service Robot collects video data on its operating environment. While the robot is in operation, the video camera captures 360 degrees of the robot's surroundings and the individuals and objects moving around it. The resolution of the video shooting is set so that video is recorded from an area up to 10 metres around the robot. People further than this from the Service Robot cannot be identified from the video footage.

5. What personal data does the Service Robot collect and process?

The service robot collects and stores video from its operating environment, and the Service Robot's location information is stored with the video footage. No audio is collected or stored. The video footage is classified as personal data, as it may be possible to identify people who are recorded in the video if they are within 10 metres of the Service Robot. It is not possible to identify people further away than this, as it is configured to the camera's resolution settings to store video at a lower resolution for objects and individuals further than 10 metres away, making it not possible to identify persons in the video image.

The video footage collected by the Service Robot is anonymized within an hour using shape and object recognition analysis as well as facial emotional analysis, and the original video footage is then deleted. What is left of the video data is anonymous, textual information about shapes and objects (including their categories, numbers, properties, and emotions) and information on where in the Service Robot's operating environment the observation has been made.

It is not possible to individualize or identify individuals in the material, and it is no longer possible to restore the original video footage to a format that would allow the identification of the persons that appear in the video. Anonymous data is not personal data.

6. What purposes is the data used for, where is the data transferred to and who processes the data?

The collection and processing of personal data is based on Telia's legitimate interest. Telia continuously develops new services and products to ensure that customers have access to modern and functional services. The testing of the Tripla Service Robot is part of the MURO project, in which Telia participates, and the PasilaHUB project coordinated by Haaga-Helia University of Applied Sciences, in which Mall of Tripla and Original Sokos Hotel Tripla participate. Developing and testing the Service Robot is not possible without testing in a real-life environment.

The information collected by the Service Robot is used to develop the robot's moving and interaction with the environment and to develop the Service Robot's product transport service. The collected data will also be rendered into anonymous textual shape, object and emotional analysis, which can be disclosed to the actors involved in the projects or to other Telia partners.

Telia processes and transfers the data collected by the Service Robot in the following three ways:

1. Video streaming:

The video transmitted by the Service Robot is used as a stream if the robot needs to be controlled remotely due to a fault situation. The video stream is sent from the robot over a closed mobile network to a streaming device and is only processed by the people controlling the robot remotely or involved in the robot's troubleshooting. The video played on the streaming device is real-time and is not recorded on the streaming device.

2. Anonymization of video footage in the Service Robot:

The video data collected by the Service Robot is processed locally in the robot, and individual images are extracted from the video stream. Shape, object and emotional analysis is then performed on these individual images. The analysis takes a few milliseconds, and the video image data is then automatically deleted. The analysis results in an anonymous textual

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description, as described in section 5 above. The anonymous text data is transferred over a closed network to Telia's data centre, where it can be used for compiling statistics and analyses.

3. Anonymization of video at Telia's data centre:

At the same time, video data collected by the Service Robot is also be transferred over a closed network to Telia's data centre in Helsinki. At the data centre, individual images are also extracted from the video, and the same recognition analysis is carried out as in the Service Robot. At the data centre, the analysis takes at most an hour, and the video image data is then automatically deleted. The analysis results in an anonymous textual description, as described in section 5 above. This can be used in compiling statistics and analyses.

7. How long is the data stored and what data is it?

The video data will be stored until the analysis is complete. The analysis carried out in the Service Robot takes a few milliseconds and at the data centre in Helsinki no more than an hour. The video image will then be automatically deleted.

The result of the analysis is an anonymous textual description as described in paragraph 5 above.

The anonymous text data resulting from the analysis will be stored and used for as long as necessary. There are no retention period requirements or other privacy requirements for anonymous data.

8. Where is the data stored and how are the security requirements taken into account?

Information security is of paramount importance to us. We strive to take appropriate actions in order to protect personal data and to prevent and detect unauthorized access to personal data and loss of personal data.

We take care of the security of our personnel, data, information systems and IT environment, offices and technical facilities. We pay special attention to protecting the personal data we process. Access to the data is limited and requires valid access rights granted in the access management system.

In data protection, we take into account the risks posed to privacy protection and business operations by the processing of personal data, the available technical options and different kinds of threats in accordance with the applicable legislation, regulations and obligations under agreements. The data is stored in locked premises and is processed only by Telia employees or persons acting on Telia's behalf who need it in their duties. The robot's video camera works in a closed network. Access to the streaming application is restricted by permissions. The data connections used for transferring the video image are secured and encrypted.

Personal data is not transferred outside the EU or EEA.

More information about Telia Company's information security practices is available here:

<https://www.teliacompany.com/globalassets/telia-company/documents/about-telia-company/what-we-do/security-in-telia-company.pdf>.

9. To whom is information disclosed?

The data may be transferred to subcontractors or partners that process the collected data on our behalf based on our assignment and a written agreement we have made. The subcontractors and partners are not allowed to use the data collected for any other purpose than for providing the service agreed with us. When using subcontractors and partners, we will ensure in an appropriate manner that the processing takes place in accordance with data protection legislation and this Privacy Policy and the supplementary Telia Privacy Notice.

Anonymous text data produced from the video image can be further processed into statistics and analyses that are handed over to Mall of Tripla and Original Sokos Hotel Tripla, as well as any other Telia partners. By using this

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information, various operators can develop services that enable customers to find the stores they want and improve customer comfort. The data can be used to draw conclusions and statistics on the flow of people, the comfort of the visitors, the operation of lifts and the transit of visitors between floors, as well as the most or the least used entry and exit routes, for example according to the time of day.

Personal data may be disclosed to companies belonging to the same group as Telia, if permitted by law, and to authorities if Telia is legally obliged to do so.

10. Rights related to the processing of personal data

If you want to avoid being recorded in the Service Robot's video, we recommend keeping more than 10 metres away from it, as the resolution of the video is adjusted so that people over 10 metres away cannot be identified from the video. The operating environment of the service robot is described in section 3 above.

The Service Robot's video image is anonymized immediately and at the latest within one hour of shooting by converting it into a text-format analysis. It is not possible to identify individuals from the text analysis, which therefore is not personal data.

11. Communication on changes to the Privacy Policy

The Service Robot is in the development phase and its functionalities will be developed throughout the testing period. As a result of the development of functionalities, there may be changes to the processing of personal data that require an update of this Privacy Policy. We continuously assess the need to update the Privacy Policy and make additions and changes to it if necessary.

We will communicate any changes to the Privacy Policy and maintain the history of changes to the Privacy Policy on Telia's website at www.telia.fi/tietosuoja. If necessary, we will also communicate changes in another manner, as appropriate.

If there is a conflict between translations, the Finnish version shall prevail.

12. Where can you get further information?

If you are interested in the operation of the Service Robot in general and would like to learn more about it, you can contact Telia's communications department at communications-fi@telia.fi.

We process personal data in accordance with data protection legislation and this Privacy Policy and Telia's Privacy Notice. The Privacy Notice is available at <https://www.telia.fi/tietosuoja-ja-tietoturva>.

In matters related to the processing of personal data and the Privacy Policy, you can contact Telia's customer service (<https://www.telia.fi/english/contact>) or call 020 690 400 or e-mail our Data Protection Officer at tietosuoja-telia@teliacompany.com.

If you think that Telia has acted contrary to the Privacy Policy or the valid legislation, you are entitled to file a complaint about the matter. You can also file a complaint with the Office of the Data Protection Ombudsman, who monitors the lawfulness of the processing of personal data. Website of the Office of the Data Protection Ombudsman: www.tietosuoja.fi.

13. Other useful links

More information about the Service Robot is available on Mall of Tripla's website at <https://malloftripla.fi/>

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More information about VTT's Multi-Purpose Service Robotics as Operator Business (MURO) project is available in this VTT article: https://www.vttresearch.com/en/project_news/finnish-companies-boost-global-mobile-service-robotics-market-innovation-ecosystem .

Further information on Haaga-Helia University of Applied Sciences' PasilaHUB project and cooperation network is available at <https://www.haaga-helia.fi/fi/kampanja/pasilahub>.