

PRIVACY POLICY

Date: 1 October, 2019

EU General Data Protection Regulation, articles 13 and 14

<p>1. Data controller</p>	<p>Finavia Corporation Business ID: 2302570-2 Street address: Lentäjätie 3, 01530 Vantaa Postal address: P. O. Box 50, 01531 Vantaa Phone (PABX): +358 20 708 000</p>
<p>2. Contact Person(s) for filing system related matters</p>	<p>Name: Olli-Pekka Lammi Title: Pricing and Analytics Manager Street address: Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa email: olli-pekka.lammi@finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Data Protection Officer of Finavia Corporation email: tietosuojaavastaava@finavia.fi Phone: +358 20 708 2828</p>
<p>4. Name of register</p>	<p>Finavia Corporation's customer register of air carriers For the purposes of this privacy statement, air carriers shall be understood to mean airport users as outlined in the Act on the Airport Network and Airport Charges.</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p><u>Processing purposes:</u> Personal data will be collected and processed in the register to enable Finavia to perform its business efficiently and for this purpose to:</p> <ul style="list-style-type: none"> • organise negotiations with airport users on charges levied by Finavia as outlined in the Act on the Airport Network and Airport Charges, • send invitations to negotiations on the implementation of major infrastructure projects, • keep in contact with representatives and contact persons of air carriers for purposes other than those mentioned above, or • use the contact details of the data subjects to send requests and invitations to participate in customer surveys, interviews and other similar surveys aimed at improving Finavia's services, including related consent requests. <p><u>Legal basis:</u> In so far as the legislation in force requires Finavia Corporation to consult the users of its services on airport charges and airport investments, the applicable legal basis is compliance with the legal obligation to which the data controller is subject. For the remainder, the legal basis is the fulfilment of the legitimate interests of the data controller in connection with the customer/cooperation relationship between the employer of the data subjects and Finavia. In this case, the legitimate interest is the execution of customer relationship and liaison and customer surveys in a</p>

	business-efficient manner to monitor and develop the quality of the services of Finavia Corporation.
6. Recipients of Personal Data	<p>Personal data will not be transferred or disclosed outside Finavia.</p> <p>To the extent that the data in this customer register is used to send consent requests for individual surveys, interviews and other similar requests, any transfers of data (e.g. to a partner acting as a service provider) shall be detailed in the relevant privacy statement that communicates how Finavia Corporation processes personal data in connection with performance of a particular survey.</p>
7. Data Contents of the register	<p>The register consists of a customer database and a variety of customer relationship attachments, which may also include personal data.</p> <p><u>Personal data concerning customer contacts in the customer database:</u></p> <ul style="list-style-type: none"> • First name and last name • Company or community • Contact information for the person • Position or task in the company <p>Customer relationship attachments, (e.g. e-mail correspondence with customers) may include similar types of personal data as the customer database.</p>
8. Data Sources	<p>The data in the customer database is obtained from the data subjects, mainly from business cards received from them or in any other similar manner.</p> <p>The communication data formed in liaison (the customer relationship attachments) is obtained from the data subjects or from a Finavia employee using the information system.</p>
9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area	The data shall not be disclosed or transferred to countries outside the EU or the EEA.
10. Data Retention Period	<p>In principle, Finavia Corporation retains the data for as long as the person is employed in a customer segment relating to Finavia's business activity in a task which is connected with processing purposes mentioned in Section 5.</p> <p>We will take reasonable measures to keep the personal data we possess accurate by deleting unnecessary data and updating outdated data. Data will be entered in the register as obtained from the data subject and will be updated to reflect the information provided by the data subject to the data controller.</p>
11. Data Protection Principles	Personal data contained in this register shall be protected by technical and organizational measures against unjustified and/or unlawful access, modification and destruction, or other processing, including unauthorized disclosure and transfer of the data in this register.

	<p>Data shall be stored in electronic systems protected by firewalls, passwords, and other appropriate technical solutions. Only designated persons employed by Finavia Corporation and other designated persons who need the data to perform their duties, will have access to the register. Anyone having access to the data in the register shall be bound by the professional secrecy.</p> <p>Finavia Corporation will comply with strict data security requirements in the management and control of access to its IT systems. Employees who process the data contained in this register as part of their duties will receive regular training and instruction concerning data protection and data security matters.</p>
<p>12. Right of Access and its Implementation</p>	<p>After having supplied sufficient search criteria, the data subject shall have the right to know what data concerning to him/her has been recorded in this register, or that the register does not contain his/her personal data. At the same time, the data controller, shall provide the data subject with information about the regular sources of data, the use of data in the register, and the regular destinations of disclosed data.</p> <p>The data subject, who wishes to inspect personal data concerning him/her in the manner described above, must submit a request to this effect to the contact person indicated in section 2 of this Privacy Policy by a personally signed or otherwise comparably verified document.</p>
<p>13. Right to Data Portability</p>	<p>After the data subject has submitted personal data concerning him/her to the data controller in a structured, commonly used, and machine-readable format, the data subject shall have the right to transmit personal data concerning him/her to another data controller where;</p> <ul style="list-style-type: none"> a) The data processing is based on the data subject's consent or a contract between the data controller and the data subject, and; a) The processing is carried out by automated means, and; b) If the transmission is technically possible.
<p>14. Right to Withdraw Consent</p>	<p>If the processing of personal data is based on the data subject's consent, the data subject shall have the right to withdraw his/her consent at any time. The consent withdrawal request must be submitted by a personally signed or otherwise comparably verified document, which should be submitted via email to the person indicated in section 2 of this Privacy Policy. However, the processing of data that took place before the withdrawal of consent will remain lawful, even if consent is withdrawn.</p>
<p>15. Rectification, Deletion and Restriction of Processing of Data</p>	<p>The data controller shall, without undue delay on its own initiative or at the request of the data subject, rectify, delete, or supplement inaccurate, unnecessary, incomplete, or outdated personal data in the register for the purpose of processing. The data controller shall also prevent the dissemination of such data if the data could compromise the data subject's privacy protection or his/her rights.</p> <p>At the data subject's request, the data controller shall restrict the processing of data if the data subject has contested the accuracy of his/her personal data, or if the data subject has claimed that the</p>

	<p>processing of data is unlawful, and has opposed the erasure of the personal data and requests the restriction of their use instead. The data controller shall also restrict the processing of data when the data controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims. In addition, the data controller shall restrict the processing of data, if the data subject has objected to the processing of personal data pursuant to the General Data Protection Regulation, and while a determination is pending the verification whether the legitimate grounds of the data controller override those of the data subject. If the data controller has restricted the processing for the aforementioned grounds, the data controller shall inform the data subject before the restriction of processing is lifted.</p> <p>The requests for rectification shall be submitted to the contact person indicated in section 2 of this Privacy Policy.</p>
<p>16. Right to Lodge a Complaint</p>	<p>The data subject shall have the right to lodge a complaint with a supervisory authority in case Finavia Corporation has not complied with applicable data protection regulations.</p>
<p>17. Communications</p>	<p>The data subject shall send the requests concerning his/her rights in writing or by email to the contact person indicated in section 2 of this Privacy Policy.</p> <p>Finavia Corporation may request the data subject to specify the request and verify his or her identity before processing the request. Finavia Corporation may refuse to execute the request based on the provisions of applicable law.</p> <p>Finavia Corporation will respond to the requests within one (1) month of receiving the request, unless there are special reasons to change the response time.</p>
<p>18. Automated Decision-Making and Profiling</p>	<p>The data in the register shall not be used for automated decision-making or profiling the data subjects.</p>
<p>19. Changes to Privacy Policy</p>	<p>Finavia Corporation is continuously developing its business and therefore reserves the right to change this Privacy Policy by posting a notification of changes on its website. The changes to the Privacy Policy may also be based on the legislative changes. Finavia Corporation recommends that the data subjects check the contents of the Privacy Policy on a regular basis.</p>