

## PRIVACY POLICY

Date: 17 October, 2023 (updated)

### EU General Data Protection Regulation, articles 13 and 14

<b>1. Data controller</b>	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
<b>2. Contact Person(s) for processing related matters</b>	Name: Minna Asikainen Title: Product Owner Street address: Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa Phone: +358 20 708 2907 Email: minna.asikainen(at)finavia.fi
<b>3. Data Protection Officer</b>	Contact information of the Data Protection Officer of Finavia Corporation Email: tietosuojavastaava(at)finavia.fi Phone: +358 20 708 2828
<b>4. Name of Processing Activity/Register</b>	User register of My Flight service
<b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b>	<u>The purpose of processing:</u> Production of the My Flight service, including delivering emails and push notifications to the user.  <u>Legal basis for data processing:</u> The data subject has given consent to the processing of personal data for electronic direct marketing with the MyFlight service.
<b>6. Recipients of Personal Data</b>	Personal data will be transferred to: <ul style="list-style-type: none"> <li>• Amazon Web Services EMEA SARM, for delivery of email via AWS SES (Simple Email Service). Amazon's servers are located within the EU.</li> <li>• Futurice Oy, for the maintenance and development of the service.</li> <li>• parties outside of Finavia that enable the sending of push notifications (push notification servers for the browser being used).</li> </ul> The collected personal data will not be disclosed for commercial purposes.
<b>7. Processed Data Contents</b>	Depending on the selected service delivery method, the following data is collected from the user of the MyFlight service: <ol style="list-style-type: none"> <li>1) MyFlight service by email             <ul style="list-style-type: none"> <li>• Consent to send marketing communications (C)</li> <li>• Email address (C)</li> <li>• Flight information (C)</li> <li>• Interests related to the flight as selected by the user</li> </ul> </li> <li>2) MyFlight service with push notifications             <ul style="list-style-type: none"> <li>• Consent to send marketing communications (C)</li> <li>• Identification data required to deliver push notifications (C)</li> </ul> </li> </ol>

	<ul style="list-style-type: none"> <li>• Flight information (C)</li> </ul> <p>The data marked with “C” is compulsory to provide the service.</p>
<b>8. Data Sources</b>	<p>The personal data is collected directly from the data subject via the finavia.fi website. The identification data necessary to deliver push notifications is obtained from the user's device.</p>
<b>9. Transfer of Personal Data to Countries Outside of the European Union or the European Economic Area</b>	<p>Finavia will not transfer personal data to countries outside the EEA or EU.</p> <p>When using push notifications, you will use the services provided by the browser manufacturer. However, Finavia cannot influence how the browser manufacturer may transfer data outside the EU/EEA area.</p>
<b>10. Data Retention Period</b>	<p>MyFlight communications can be sent</p> <ul style="list-style-type: none"> <li>• until the departure or cancellation of the flight (departing flight), or</li> <li>• until a feedback request is sent (arriving flight), which happens after the end of baggage delivery.</li> </ul> <p>The data will be erased during the day after the events mentioned above.</p> <p>Email addresses that have been found to be inactive will be erased from AWS SES service every 3 months.</p>
<b>11. Data Protection Principles</b>	<p>Personal data 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.</p> <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 data. Anyone having access to the data 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 as part of their duties will receive regular training and instruction concerning data protection and data security matters.</p>
<b>12. Right of Access and its Implementation</b>	<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, or that his/her personal data is not processed. At the same time, the data controller shall provide the data subject with information about the regular sources of data, the use of data, and the regular destinations of disclosed data. Refer to section <b>17. Communications</b> for detailed instructions.</p>
<b>13. Right to Data Portability</b>	<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>

	<p>a) The data processing is based on the data subject's consent or a contract between the data controller and the data subject, and;</p> <p>b) The processing is carried out by automated means, and;</p> <p>c) If the transmission is technically possible.</p> <p>[Not applicable to this processing]</p>
<p><b>14. Consent and the Right to Withdraw Consent</b></p>	<p>The processing of personal data is based on the data subject's consent to the delivery of personalized marketing communications by e-mail or with notifications. The data subject has the right to withdraw this consent at any time. Consent can be withdrawn:</p> <ul style="list-style-type: none"> <li>• via the cancellation link at the end of each marketing message, delivered by email which terminates the delivery of the My Flight service (<i>recommended method</i>), or</li> <li>• if push notifications were selected as the delivery method, on the page of the flight in question on the finavia.fi website or in the browser settings of the device (<i>recommended method</i>), or</li> <li>• via the procedure described in section <b>17. Communications</b> of this policy.</li> </ul> <p>However, the processing of data that took place before the withdrawal of consent will remain lawful, even if consent is withdrawn.</p>
<p><b>15. Rectification, Deletion and Restriction of Processing of Data</b></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 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 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 on the aforementioned grounds, the data controller shall inform the data subject before the restriction of processing is lifted.</p>
<p><b>16. Right to Lodge a Complaint</b></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><b>17. Communications</b></p>	<p>The data subject, who wishes to inspect personal data concerning him/her in the manner described in section 12 of this Privacy Policy or to use any other right based on law, must submit a request to this effect either</p> <ol style="list-style-type: none"> <li>by using the Data Subject Access Request form available on the Finavia website <a href="https://www.finavia.fi/en/data-protection">https://www.finavia.fi/en/data-protection</a> (recommended), or</li> <li>in a personally signed or otherwise comparably verified document</li> </ol> <p>The request in writing (alternative b above) must be submitted 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><b>18. Automated Decision-Making and Profiling</b></p>	<p>The data shall not be used for automated decision-making or profiling the data subjects.</p>
<p><b>19. Changes to the Privacy Policy</b></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>
<p><b>20. Summary of update changes</b></p>	<p><u>17 October, 2023</u></p> <ul style="list-style-type: none"> <li>Updated sections 5 to 10 and 14 because the MyFlight service can now, in addition to by email, be delivered with push notifications.</li> <li>In addition, in Section 5, consent as the legal basis for processing is specified to only apply to electronic direct marketing related to the MyFlight service.</li> </ul>