

PRIVACY POLICY

Date: January 19, 2021

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 information for filing system related matters</p>	<p>Finavia Corporation, Customer Service Street address: Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa Email: asiakaspalvelu@finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Data Protection Officer of Finavia Corporation email: tietosuojavastaava(at)finavia.fi Phone: +358 20 708 2828</p>
<p>4. Name of register</p>	<p>Customer Service register (Freshworks)</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p><u>The purpose of processing:</u> The purpose of the processing of personal data is to register, process and respond to customer communications submitted to Finavia Corporation. By means of processing, Finavia Plc can fulfill its regulatory obligations, compile statistics on its operations, monitor its customer service, improve and develop its operations and services, and correct or compensate the customer for errors caused by Finavia's operations</p> <p><u>Legal basis for data processing:</u> The processing of personal data in connection with customer inquiries concerning environmental issues and the accessibility of digital services is necessary in order to comply with the legal obligation of the controller.</p> <p>Other than the processing of personal data referred to above is based on a legitimate interest of the data controller or a third party. This interest is monitoring and improving of the customer-service at Finavia's airports.</p> <p>If the customer contact involves the need to process personal data belonging to special categories of personal data, for example in connection with a claim, their processing is based on the data subject's explicit consent to the processing of his or her personal data for one or more purposes (e.g. medical certificate in case of injury).</p>

<p>6. Recipients of Personal Data</p>	<p>The data is transferred to a server (SaaS) which is located in the EU and hosted by a system vendor (Freshworks). The software package also utilizes services provided by the system vendor's sub-processors whose servers are located in the EU.</p> <p>Finavia provides customer contact information to the airline concerned when the matter concerns the airline's operations and the airline is responsible for resolving the matter.</p> <p>If Finavia uses its liability insurance in contacts concerning personal injury or property damage to determine the liability and the amount of indemnity, the information required for claims handling will be handed over to the insurance company used by Finavia (currently AIG).</p> <p>Customers' personal data obtained through environmental contacts may be disclosed to another operator in the context of feedback on the other operator's area of responsibility to which a response has been requested. Such parties include, for example, environmental authorities and the air navigation services company Fintraffic Lennonvarmistus Oy (formerly Air Navigation Services Finland Oy).</p> <p>Finavia Corporation will not disclose the collected data for commercial purposes.</p>
<p>7. Data Contents of the register</p>	<p>Finavia collects and processes the following personal data to the extent that it is available (data types vary by contact type):</p> <ul style="list-style-type: none"> • name • telephone number • email address • the airport to which the contact relates • contact information content • the date • time of day • street address, postal code, municipality • venue • flight number • vehicle registration number for handling vehicle damage • other documents that may be needed to deal with the case (e.g. copies of various documents, photographs of the subject of the damage). • From the customer's chat conversation, Finavia collects: <ul style="list-style-type: none"> ➤ type of device and browser used for communication, ➤ IP address and inferred location ➤ browser's language and time zone, ➤ any attachment files transferred and ➤ customer's user profile on Finavia's website <p>In addition, in cases of personal injury claims and damage claim reports, Finavia requests, collects and stores the person's consent to the processing of his or her health data and processes the data as required by the case (assessment of damage/injury, disclosure to the insurance company, etc.).</p>

<p>8. Data Sources</p>	<p>The information to be stored in the register will be obtained from the data subject himself via an electronic contact form, e-mail or telephone.</p>
<p>9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area</p>	<p>Personal data will not be transferred or disclosed by Finavia outside the European Union or European Economic Area countries. If, in connection with the maintenance of the applicable system, there is a need to transfer personal data to a non-EU/EEA country whose legislation has not been considered by the EU Commission to meet an adequate level of data protection, the transfer will be ensured by providing appropriate safeguards in accordance with the provisions of the EU General Data Protection Regulation.</p>
<p>10. Data Retention Period</p>	<p>The data will be retained for 2 years from the completion of the investigation of the case and the end of associated customer communication, in accordance with Finavia's own policy. An exception is environmental feedback which is permanently retained for the purpose of preparing the reports required by the environmental authorities.</p> <p>Chat conversations are in principle not stored; chat conversation content and the technical data related to the use of chat is erased after a month.</p> <p>In certain cases (like damage claims) to which the provisions of the Accounting Act apply, the retention period is determined in accordance with the relevant legislation (typically the retention obligation is 6 + 1 years).</p>
<p>11. Data Protection Principles</p>	<p>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> <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</p>

	<p>this effect to the address indicated in section 2 of this Privacy Policy by a personally signed or otherwise comparably verified document or by using the Subject Access Request form available on the Finavia website (https://www.finavia.fi/en/data-protection).</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 address 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 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 address indicated in section 2 of this Privacy Policy or by using the Subject Access Request form available on the Finavia website (https://www.finavia.fi/en/data-protection).</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 address indicated in section 2 of this Privacy Policy or by using the Subject Access Request form available on the Finavia website (https://www.finavia.fi/en/data-protection).</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>