

**PRIVACY POLICY**

**Date:** August 19, 2019

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

<p><b>1. Data controller</b></p>	<p>Finavia Corporation Business ID: 2302570-2 Street address: Lentäjätie 3, 01530 Vantaa Postal address: PL 50, 01531 Vantaa Phone (PABX): +358 20 708 000</p>
<p><b>2. Contact Person(s) for filing system related matters</b></p>	<p>Name: Annika Kåla (Gredi) Title: Communications Manager Address: Finavia Corporation, Lentäjätie 3, P.O Box 50, 01531 Vantaa Phone: +358 20 708 000 Email: <a href="mailto:comms@finavia.fi">comms@finavia.fi</a></p> <p>Name: Kirsi Luhta (Dreambroker) Title: Communications Expert Address: Finavia Corporation, Lentäjätie 3/P.O Box 50, 01531 Vantaa Phone: +358 20 708 2101 Email: <a href="mailto:kirsi.luhta@finavia.fi">kirsi.luhta@finavia.fi</a></p>
<p><b>3. Data Protection Officer</b></p>	<p>Data Protection Officer of Finavia Corporation email: <a href="mailto:tietosuojavastaava@finavia.fi">tietosuojavastaava@finavia.fi</a> Phone: +358 20 708 2828</p>
<p><b>4. Name of register</b></p>	<p><b>Finavia image and video material repository</b></p> <p>The video material stored in Dreambroker is used only Finavia internally.</p> <p>The image and video material stored in Gredi are also used in external communication of Finavia.</p>
<p><b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b></p>	<p><u>The purpose of processing of personal data:</u></p> <p>Management of image and video material used by Finavia Corporation in their internal communications so that Finavia Corporation can effectively conduct its business.</p> <p><u>Legal basis for data processing:</u></p> <p>The legal basis of processing the personal data relating to access to the image and video material repository is performance of a contract to which the data subject is party (employment contract or other employment; or a commercial service contract for material to be stored in this repository).</p> <p>The processing of personal data of individuals who appear in the background or otherwise by coincidence in image or video material, is necessary for the legitimate interests of the controller (videotaping and photographing is generally restricted to areas controlled by Finavia without seeking to identify persons appearing in the background).</p>

	<p>The legal basis for processing of personal data with respect to a person who has agreed to being photographed/videoed is the data subject's consent.</p>
<b>6. Recipients of Personal Data</b>	<p>Image and video material will be transferred to cloud services operated by external service providers (currently Gredi Oy and Dreambroker Oy).</p> <p>In connection with Finavia group's communications, limited access to image material is granted to media representatives, whereupon the recipient may download some of the photographs chosen by Finavia Corporation for their purpose, including meta data.</p>
<b>7. Data Contents of the register</b>	<p>Concerning the persons authorized to access the repository, the following data is processed:</p> <ul style="list-style-type: none"> <li>• Email address and other necessary user data required for the access</li> </ul> <p>Concerning persons who have granted their permission, the photograph or video footage is stored, often including voice, and in some instances, also his/her name.</p> <p>Concerning persons who by coincidence appear in the background, only the video footage or a still picture is stored.</p>
<b>8. Data Sources</b>	<p>Data necessary for the management of access rights is partly collected from other registers of Finavia and partly from the data subject him/herself (inter alia the password).</p> <p>The personal data contained in the image and video material is collected to digital recordings by photographing or by shooting a video and they are stored by the person authorized to access the repository, including the name of the person who authorised his or her being photographed/videoed.</p>
<b>9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area</b>	<p>Some image material is also released to journalists or other media outside the European Union or European Economic Area as part of Finavia's standard corporate communications.</p> <p>User Management Information or other information not mentioned above will not be transferred or disclosed to countries outside the European Union or the European Economic Area.</p>
<b>10. Data Retention Period</b>	<p>User Management Information is retained for as long as the data subject's access is required.</p> <p>Image and video material will be retained for as long as the image or video repository service is in use or there is no longer any communication need to preserve the material.</p>
<b>11. Data Protection Principles</b>	<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 desig-</p>

	<p>nated 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><b>12. Right of Access and its Implementation</b></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><b>13. Right to Data Portability</b></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"> <li>a) The data processing is based on the data subject's consent or a contract between the data controller and the data subject, and;</li> <li>a) The processing is carried out by automated means, and;</li> <li>b) If the transmission is technically possible.</li> </ul>
<p><b>14. Right to Withdraw Consent</b></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><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 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</p>

	<p>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 in 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>
<b>16. Right to Lodge a Complaint</b>	<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>
<b>17. Communications</b>	<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>
<b>18. Automated Decision-Making and Profiling</b>	<p>The data in the register shall not be used for automated decision-making or profiling the data subjects.</p>
<b>19. Changes to Privacy Policy</b>	<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>