

PRIVACY POLICY

Date: 17 November, 2020 (Updated sections – 2: Contact person change; 5 and 7: Included feedback on the accessibility of the digital services; 12, 15 and 17: Included reference to availability of the Subject Access Request form on the Finavia website)

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: PL 50, 01531 Vantaa Phone (PABX): +358 20 708 000</p>
<p>2. Contact Person(s) for filing system related matters</p>	<p>Name: Hanna Hämäläinen Title: Head of Passenger Services and Development Street address: Finavia Corporation, Lentäjätie 3 Postal address: POB 50, 01531 Vantaa email: firstname.surname(at)finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Data Protection Officer of Finavia Corporation email: tietosuojavastaava(at)finavia.fi Phone: 020 708 2828</p>
<p>4. Name of register</p>	<p>Customer feedback register</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p>The purpose of processing of personal data is registration of, processing of and responding to customer feedback submitted to Finavia Corporation. Processing allows Finavia Corporation to monitor the customer experience, improve and develop its operations and services as well as correct errors or compensate customer for errors caused by Finavia's operations.</p> <p>Legal bases for processing personal data:</p> <ul style="list-style-type: none"> • Processing is necessary for compliance with a legal obligation to which the controller is subject, as regards feedback received in the context of feedback on the accessibility of digital services • Processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, when monitoring and improving the customer experience at Finavia airports.
<p>6. Recipients of Personal Data</p>	<p>Data will not be disclosed on a regular basis and Finavia Corporation will not disclose the collected data for commercial purposes.</p>
<p>7. Data Contents of the register</p>	<p>We collect, store and process:</p> <p>The personal data of the feedback provider: forename, surname, email address, flight number*, time of occurrence* and the name of the airport the feedback concerns*, the narrative of the feedback and an indication if response or reply to the feedback is desired. In connection with feedback on accessibility of the digital service, also a phone number.</p> <p>*) not in connection with feedback on accessibility of the digital service</p> <p>On a case by case basis, as necessary for the processing of a feedback or a claim, Finavia may request the data subject to submit a</p>

	copy of the parking ticket, parking advance reservation information, the 6 leading and 4 trailing digits of the charge card, bank account information and a copy of the flight ticket, boarding card or disability certificate.
8. Data Sources	The stored data is collected directly from the data subject either by means of a feedback form or by email.
9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area	Personal data will not be disclosed by Finavia outside the European Union or European Economic Area.
10. Data Retention Period	The data retention period for the customer feedback is 2 years. This period is based on a Finavia Corporation policy. After this period, the data and all contact information will be erased from the system.
11. Data Protection Principles	<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>
12. Right of Access and its Implementation	<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 or by using the Subject Access Request form available on the Finavia website (https://www.finavia.fi/en/data-protection).</p>
13. Right to Data Portability	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

	<p>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.
14. Right to Withdraw Consent	<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>
15. Rectification, Deletion and Restriction of Processing of Data	<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 contact person 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>
16. Right to Lodge a Complaint	<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>
17. Communications	<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 or by using the Subject Access Request form</p>

	<p>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>