

**PRIVACY POLICY**

**Date:** 25 August, 2021

**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: P. O. Box 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: Niko Ropa Title: Landside Traffic Manager Street address: Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa Phone: +358 20 708 3230 Email: niko.ropa(at)finavia.fi</p>
<p><b>3. Data Protection Officer</b></p>	<p>Data Protection Officer of Finavia Corporation email: tietosuojavastaava(at)Finavia.fi Phone: +358 20 708 2828</p>
<p><b>4. Name of register</b></p>	<p>Helsinki Airport vehicle parking register  The register consists of data processed in the Parking Administration Systems and the Parking Guidance Systems of the parking lots as well as in the associated Customer Information Systems.</p>
<p><b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b></p>	<p>The purpose of processing personal data is to manage the parking service provided for customers of the parking lots of Finavia Corporation at Helsinki Airport, to provide parking guidance, to prevent and detect misuse and to secure property of Finavia, and with respect to this, also to maintain customer relations and to enable invoicing.</p> <p>The data can also be used for monitoring the parking lot (e.g. detection of hazardous situations, damage and injury), for statistical purposes, for data analyses or for customer research related to matters such as service development or business streamlining, and for direct marketing aimed at corporate customers who have subscribed to Moovy contract parking and consented to direct marketing.</p> <p>The Legal Basis for Data Processing in parking management, customer relationship management and parking guidance is that processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. The contract may relate to:</p> <ul style="list-style-type: none"> <li>• one-off parking (regardless of method of payment),</li> <li>• long-term parking with a parking permission<sup>1</sup> charged to a company or</li> <li>• parking charged by a third party based on the customer being registered as a user of the mobile application.</li> </ul>

<sup>1</sup> The parking permission can be linked to an ID card or to a vehicle registration number

	<p>The Legal Basis for Data Processing in securing Finavia’s property (e.g. by means of surveillance cameras), prevention and detection of misuse, statistics, invoicing of company parking permissions, data analyses and customer research is that processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.</p> <p>The Legal Basis for Data Processing for purposes related to direct marketing (to Moovy corporate customers) is that the data subject has consented to their personal data being processed for one or more specific purposes.</p> <p>The legitimate interests of Finavia Corporation with regard to pursuing its business are:</p> <ul style="list-style-type: none"> <li>• the need to control public order and to protect property of Finavia and thus ensure safety and security in parking lots,</li> <li>• the ability to invoice the service provided to customers and</li> <li>• the opportunity to develop Finavia’s services.</li> </ul>
<p><b>6. Recipients of Personal Data</b></p>	<p>On a regular basis, Finavia Corporation shall transfer collected personal data only for purposes defined in this privacy policy document. The data will also be processed by external service providers related to parking service management and parking guidance, marketing of Finavia, customer research, data analyses and other similar purposes. Each data transfer to a service provider shall be limited to the extent necessary for the concerned processing activity.</p> <p>Data related to parking management is transferred to Parktech Finland Oy for system maintenance purposes.</p> <p>At some parking lots, registered users of the Moovy mobile application are able to pay for their parking based on the option selected in the application settings, either via the application or as a one-time payment to Finavia’s payment machine.</p> <p>Data related to parking transactions in these lots:</p> <ul style="list-style-type: none"> <li>• will be transferred for processing in Finavia’s Parking Administration System managed by Finnpark Oy (regarding P1/P2 lots and other lots where payment via Moovy is possible) and</li> <li>• will be disclosed to Finnpark Oy to the extent necessary for invoicing via the Moovy mobile application (Finnpark Oy shall be responsible for processing the data obtained in this way in accordance with the Moovy terms and conditions of use and privacy policy).</li> </ul> <p>The data will be transferred to FLS Finland Oy, as necessary for the maintenance of the Parking Guidance System.</p>
<p><b>7. Data Contents of the register</b></p>	<p>The following personal data is processed in this register:</p> <p><u>In connection with every parking transaction:</u></p> <ul style="list-style-type: none"> <li>• The vehicle registration number is scanned at the gate and stored in the Parking Management System. The registration number identifies the vehicle and connects it to the parking transaction being started/completed, or it is used to detect valid parking rights and control the gates.</li> </ul>

	<ul style="list-style-type: none"> <li>• In parking garages equipped with FLS Portier “Find My car” Parking Guidance System, in addition to above, the vehicle registration number is optically detected upon entry into a parking space, and a timestamp with the space location identifier are collected. These data are used when the “Find My Car” service is requested.</li> </ul> <p><u>One-off parking:</u></p> <ul style="list-style-type: none"> <li>• If parking is pre-booked via the Finavia website, the following data required to execute the booking will also be saved into this register: the booked parking lot, the start and end time of the booking, as well as the vehicle registration number possibly given by the customer at the time of booking.</li> <li>• Parking transaction data: the parking lot, the actual parking start time and end time, the fee based on these and information on whether the fee was paid.</li> <li>• The email address entered by the customer at the payment machine for delivering the receipt by email.</li> </ul> <p><u>Long-term parking permissions (customer information system):</u></p> <ul style="list-style-type: none"> <li>• The contact information and parking permission data (allowed lots and validity data) of the parking permission holder and parking permission subscriber/company.</li> <li>• The vehicle registration number, if given at the time of ordering the permission or at a later point in time.</li> </ul> <p><u>Corporate customers subscribed to Moovy contract parking:</u></p> <ul style="list-style-type: none"> <li>• The name and contact information of the company contact person and their marketing consent (if any).</li> <li>• The contact information of the person given parking rights under a company contract and their marketing consent (if any), along with the vehicle registration number when the parking right is exercised.</li> </ul> <p><u>Parking lot surveillance:</u></p> <p>In the P1 and P2 parking garages, the Parking Guidance System momentarily records parking space events. The record contains information about vehicles as well as persons nearby if they are inside the surveillance area during the time of recording activated by motion sensors.</p>
<p><b>8. Data Sources</b></p>	<p><u>One-off parking:</u></p> <ul style="list-style-type: none"> <li>• If parking is pre-booked, information identifying the booking is obtained from the customer as he/she makes the booking via the Finavia website.</li> <li>• Information identifying the parking transaction is obtained via the detector systems at the parking lot entry and exit points*.</li> <li>• Information on the price of one-off parking is obtained automatically from the aforementioned data.</li> </ul> <p>* Regardless of the nature of the parking transaction (one-off, parking permission/contract parking), the scanned vehicle registration number will be obtained from the detector systems of the Parking Administration System upon entry and exit.</p>

	<p><u>Long-term parking permissions (Customer Information System):</u></p> <ul style="list-style-type: none"> <li>• Data related to the customer and their (business) parking permissions is collected from the parking permission order form filled in by the customer or the company representative when the service is contracted.</li> <li>• The person ordering the parking permission or the permission holder may specify a vehicle registration number to be associated with the parking permission.</li> </ul> <p><u>Corporate customers subscribed to Moovy contract parking:</u></p> <ul style="list-style-type: none"> <li>• For companies subscribed to Moovy contract parking, data on parking rights assigned to employees and whether they have consented to direct marketing will be obtained from the company contact persons and the people who are given parking rights.</li> </ul> <p><u>Garages equipped with FLS Portier Parking Guidance System:</u></p> <p>Vehicle positioning information for the Parking Guidance System (including registration numbers, timestamps and location identifiers) is obtained from the Parking Guidance System cameras near the parking space, which also provide surveillance images. The initial data required to search for the location of the parked vehicle is obtained from the customer.</p> <p>The data obtained by the aforementioned means is used as the baseline data in statistics and data analyses.</p>
<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>	<p>In principle, Finavia shall not disclose or transfer data outside the borders of the European Union or European Economic Area.</p> <p>Should a need arise to transfer or disclose data outside this area the disclosure or transfer will be secured using the European Commission’s standard contractual terms, unless data is disclosed or transferred to a recipient in a country that already, according to a decision by EU Commission, applies an adequate level of data protection.</p>
<p><b>10. Data Retention Period</b></p>	<p>Finavia Corporation will retain personal data in accordance with the legislation in force and only as long as necessary for the purposes specified in this Privacy Policy.</p> <p>Personal data older than 12 calendar months is erased from the Parking Administration Systems monthly.</p> <p>The Customer Information System contains active parking permission data. Obsolete data will be erased from the Customer Information System at least once per year.</p> <p>Vehicle specific personal data will be erased from the Parking Guidance System within 2 days from the end of the parking of the vehicle.</p> <p>However, personal data may be stored for a period longer than the aforementioned periods due to the obligations under applicable law.</p>

<p><b>11. Data Protection Principles</b></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><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 or by using the 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>).</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>b) The processing is carried out by automated means, and;</li> <li>c) 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 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 (<a href="https://www.finavia.fi/en/data-protection">https://www.finavia.fi/en/data-protection</a>).</p>
<p><b>16. Prohibition on Direct Marketing</b></p>	<p>The data subject has any time the right to object to processing of personal data concerning him or her for direct marketing purposes.</p>
<p><b>17. 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>18. Communications</b></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 or by using the 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>).</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>19. Automated Decision-Making and Profiling</b></p>	<p>The data in the register shall not be used for automated decision-making or profiling the data subjects.</p>

<p><b>20. Changes to 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>21. Changes in this update</b></p>	<p>This policy is updated on August 25, 2021 because of the following.</p> <p>Contact Person change in section 2. Removal of reference to LAK Real Estate in section 5.</p> <p>An advanced Parking Guidance System “FLS Portier” will be introduced in the P1 and P2 parking garages when they open (expected at end of 2021).</p> <p>To clarify the description, resulting from the aforesaid, section 4 now lists the information systems of the register, and data processing is now described system by system in sections 5 to 8 and 10.</p> <p>The Purposes and the Legal Basis for Processing in the Parking Guidance System have been added in section 5, and the information in sections 6 to 8 have been updated as accordingly.</p> <p>The term “parking permit” is not used any more because parking cards are no more used after the reform. This impacts sections 5, 7, 8 and 10. Reference is now made to long-term (contract) parking and associated parking rights, only.</p> <p>In section 6, reference to data transfer (when necessary) to the maintenance organisation of the Parking Administration System has been added.</p>