

## **PRIVACY POLICY**

Date: 14 October 2021 (for update summary, see section 20)

## EU's General Data Protection Regulation (GDPR), articles 13 and 14

1.	Data controller	Finavia Corporation VAT Number: FI23025702 Street Address: Lentäjäntie 3, 01530 Vantaa, Finland Postal Address: P.O. Box 50, 01531 Vantaa, Finland Telephone (PABX): +358 20 708 000
2.	Contact person for personal data processing-related matters	Name: Annika Kåla Title: Communications Manager Street Address: Lentäjäntie 3, 01530 Vantaa, Finland Postal Address: P.O. Box 50, 01531 Vantaa, Finland Telephone: +358 20 708 000 Email: comms(at)finavia.fi
3.	Data Protection Officer	Contact information of the data protection officer of Finavia Corporation:  E-mail: tietosuojavastaava(at)finavia.fi Telephone +358 20 708 2828
4.	Name of processing activity and service description	Collection of press release subscriptions on Finavia's website and the submission information transmission service
		This privacy policy is applicable to subscriptions made on Finavia's website only:
		You can subscribe for press releases produced by Finavia on Finavia's website. Finavia is responsible for the collection of the subscriber data received on its website and the transmission of the data to STT Viestintäjärjestelmät Oy (hereinafter "STT"). The transmitted subscriber data will be stored in STT's data file for the implementation of information distribution.
		Subscription for press releases on STT's website and the distribution service:
		You can also subscribe for the press releases of many organisations, such as Finavia, on the <u>STT Info website</u> , in which case all subscription information is processed by STT as a whole.
		Regardless of how you subscribe for Finavia's press release distribution, STT will be responsible for all personal data processing in the STT Info distribution service as its data controller in accordance with the privacy statement.
5.	Purpose of Processing of Personal Data and the Legal Basis for Data Processing	Finavia's purpose for the processing of personal data is to collect and transfer Finavia Corporation's press release subscriber data to the distribution service provider, which maintains and is responsible for the distribution data file.
		Finavia's legal basis for processing personal data is the legitimate interest of the data controller or a third party, so as to enable Finavia to conduct its business efficiently by offering its information services to its customers by means of an electronic subscription on its website.



6. Recipients of Personal Data	Finavia Corporation transfers the subscriber data it has collected to STT Viestintäpalvelut Oy in order to arrange the distribution of the press releases.  The data is not transferred for any other purposes.
7. Processed data contents	Data entered by the subscriber on Finavia's website:
7. Processed data contents	First name, last name and email address of the subscriber, the company or organisation represented by the subscriber (if entered) and the language of the press release subject to the subscription.
8. Data sources	The data is collected from press release subscriptions made on Finavia's website.
9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area	The data is not transferred outside the European Economic Area (EEA).
10. Data Retention Period	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. However, personal data may be stored for a period longer due to the regulations under applicable law.
11. Data Protection Principles	Personal data processed in this activity 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 processed data.
	Data shall be processed 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.
	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.
12. Right of Access and its implementation	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 stored. 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.
	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> ).



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 transmit personal data concerning him/her to another data controller where;  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	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.
15. Rectification, Deletion and Restriction of Processing of Data	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.
	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 defense 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.
	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).
16. Right to Lodge a Complaint	The data subject has the right to lodge a complaint with the supervisory authority if Finavia Corporation has not complied with the applicable legislation governing data protection in its operations.



17. Communications	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> ).
	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.
	Finavia Corporation shall respond to the requests within one (1) month of receiving the request, unless there are special reasons to change the response time.
18. Automated Decision-Making and Profiling	The data shall not be used for automated decision-making or profiling of the data subjects.
19. Changes to the Privacy Policy	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.
20. Description of update changes	14 October 2021:
	Due to a change of the press release distribution service provider, both the subscription procedure and responsibility for data protection have partially changed. STT Viestintäjärjestelmät Oy acts as the data controller of the subscriber data file, and Finavia shall only be responsible for the collection of data on its website as well as the transmission of the data to STT. The privacy policy has been updated accordingly. The changes are so numerous that the amended sections of text compared to the previous version have not been highlighted.