

**PRIVACY POLICY**

**Date:** Feb 19, 2020 (contact person information updated)

**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): 020 708 000</p>
<p><b>2. Contact Person(s) for filing system related matters</b></p>	<p>Name: Ari Kumara Title: Vice President Street address: Finavia Corporation, Lentäjätie 3 Postal address: /PL 50, 01531 Vantaa email: ari.kumara(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: 020 708 2828</p>
<p><b>4. Name of register</b></p>	<p>Finavia's Tolotrack access control system user register</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 maintain the Finavia Corporation operated access control system which enables independent access for general aviators to areas reserved for the general aviation. The identification of registered users of the system is based on the phone number and name of the user.</p> <p>Personal data is used for following purposes:</p> <ul style="list-style-type: none"> <li>- For access control to ensure airport security and safety of air travel</li> <li>- To fulfil regulatory obligations</li> <li>- To prevent misuse</li> </ul> <p>Legal basis for data processing:</p> <ol style="list-style-type: none"> <li>a) 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 (e.g. an order/a contract concerning Finavia services offered to their customers).</li> <li>b) Processing is necessary for compliance with a legal obligation to which the controller is subject (such as a labor contract or other service contract and for example access control at airports).</li> <li>c) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (statistical analysis and system/service development).</li> </ol>
<p><b>6. Recipients of Personal Data</b></p>	<p>The service is outsourced to a company to whom the data is transferred for storage and for technical maintenance and development of the system.</p> <p>Personal data collected in the register is released under supervision, only for the purposes specified in this Privacy Policy. When</p>

	<p>disclosing material, we comply with secure data processing and transfer methods.</p> <p>Data can be disclosed:</p> <ul style="list-style-type: none"> <li>– To a competent authority in the specific cases regulated by legislation, for example, for the investigation of a crime</li> </ul> <p>The disclosure of data is always based on a justified and detailed request in writing submitted by the recipient.</p> <p>The data in the register is not disclosed for commercial purposes.</p>
<p><b>7. Data Contents of the register</b></p>	<p>Finavia will store in the register the data concerning persons who have a justified need to pass via Tolotrack controlled access routes. These people groups include Finavia’s own personnel, general aviators, flight club members, parachutists, authorities and aviation students.</p> <p>Personal data collected in the register:</p> <ul style="list-style-type: none"> <li>– Surname, forename</li> <li>– Phone number(s)</li> <li>– Represented party/ Organization/ Pilot license number or information of another document needed to grant access right.</li> <li>– The names of the airports for which access right has been granted.</li> <li>– Start and end date of access right validity period</li> </ul> <p>Neither the date of birth nor the email address filled in the registration form will be stored in the register but can be used in checking the applicant’s justification for the access right.</p> <p>Data stored in the register upon access:</p> <ul style="list-style-type: none"> <li>– Event data captured by the access control system in connection with opening a gate or a door is stored together with event date and time.</li> </ul>
<p><b>8. Data Sources</b></p>	<p>Data subject’s personal data is collected when the applicant fills an application form available on Finavia Corporation’s website.</p> <p>The data of the use of access control system is collected from the Tolotrack system.</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>The data stored in the register shall not be disclosed or transferred outside the EU or the European Economic Area.</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. However, personal data may be stored for a period longer than the aforementioned period due to the obligations under applicable law.</p> <p>We will take reasonable measures to keep the personal data we possess accurate by deleting unnecessary data and updating outdated data. Data will be entered in the register as obtained from the data subject and will be updated to reflect the information provided by the data subject to the data controller.</p>

	<p>The data that is generated when the access right is used will be stored for a period one (1) year and will thereafter be automatically erased from the system.</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.</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 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>
<p><b>16. 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>17. 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.</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>18. 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>19. 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>