

**PRIVACY POLICY**

**Date:** 24 May, 2018

**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>Jyrki Saukkonen Service Manager Street address: Lentäjätie 3, 01530 Vantaa Phone (PABX): 020 708 000</p>
<p><b>3. Data Protection Officer</b></p>	<p>Data Protection Officer of Finavia Oyj email: <a href="mailto:tietosuojaava@finavia.fi">tietosuojaava@finavia.fi</a> Phone: 020 708 2828</p>
<p><b>4. Name of register</b></p>	<p>Airport Services' register</p>
<p><b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b></p>	<p>The register contains personal data collected by Finavia from air passengers and other terminal users at all Finavia airports.</p> <p>The airport services provided by Finavia to the air passengers comply with international standards, practices and procedures. In addition, said services are regulated by a number of laws and regulations. In connection with the services provided at the airports, Finavia collects data for the following purposes:</p> <ul style="list-style-type: none"> <li>• To verify the right of access to the security restricted area of the terminal by collecting data contained in the boarding pass</li> <li>• To predict the waiting time at the security checks in order to streamline the terminal passenger flows (by using mobile positioning data)</li> <li>• The reception, handling and screening of hold baggage</li> <li>• To promote air travel security and punctuality in terms of Finavia's processes</li> <li>• To improve the passenger flow analysis and service experience (by using indoor positioning)</li> <li>• To monitor and improve the customer experience</li> <li>• Statistics and data analysis related to air travel (including the passenger throughput time analysis from the baggage check-in for the flight or from the security control to the gate); the aim of the anonymous final results of this analysis is to optimise the movement at the terminal.</li> </ul> <p><u>Legal basis for processing:</u></p> <ul style="list-style-type: none"> <li>• processing is necessary for compliance with a legal obligation to which the data controller is subject and to enable the service based on those obligations.</li> <li>• processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party</li> </ul>

	(analyses, statistics, development of services, and estimation of potential for commercial utilization).
<b>6. Recipients of Personal Data</b>	<p>Personal data contained in the systems of some registers is transferred to the service providers who store personal data on behalf of Finavia Corporation in the so-called cloud computing service.</p> <p>Personal data may be disclosed to the baggage handlers for use in situations where the baggage must be removed from the aircraft hold before flight departure under international flight safety regulations and standards. The aim is to support both the punctuality of air transport and consequently, the smooth flow of air travel.</p> <p>Personal data may also be disclosed to the authorities at their justified request.</p>
<b>7. Data Contents of the register</b>	<p>The data content of the register consists of the following categories of personal data:</p> <ul style="list-style-type: none"> <li>• Data obtained from an air passenger's boarding pass</li> <li>• Checked baggage data obtained from air carriers, which are necessary for routing the baggage to the right flight.</li> <li>• Data obtained from the mobile device of a person who is at the terminal (the so-called MAC address, which is immediately masked so that the single device cannot be identified and connected to a person).</li> </ul>
<b>8. Data Sources</b>	<p>Some of the data is obtained from the register, for example, from the passenger's boarding pass.</p> <p>Some of the data is obtained through the international airlines network (e.g. data related to baggage processing).</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>Finavia Corporation will not transfer or disclose information beyond the European Union or the European Economic Area (the servers of the information technology service providers we use are located within the area jointly formed by EU and /EEA).</p> <p>If a transfer outside the aforementioned area will become relevant at a later point, the protection of personal data will be ensured by adopting a mechanism approved by the European Union, unless the country of destination is directly approved by the European Union as the country of destination for personal data. In this event, this Privacy Policy will be updated without undue delay.</p>
<b>10. Data Retention Period</b>	<p>The data retention period will vary per IT system because there are dozens of different systems in use.</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><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 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.</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>