

**PRIVACY POLICY**

**Date:** June 27, 2023

**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 for processing related matters</b></p>	<p>Name: Hanna Hämäläinen Title: Head of passenger Services and Development Street address: Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa Email: hanna.hamalainen(at)finavia.fi</p>
<p><b>3. Data Protection Officer</b></p>	<p>Contact information of the Data Protection Officer of Finavia Corporation Email: tietosuojavastaava(at)finavia.fi Phone: +358 20 708 2828</p>
<p><b>4. Name of Processing Activity/Registrar</b></p>	<p>Register of the business flight terminal's FBO1 ERP system</p>
<p><b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b></p>	<p><u>The purpose of processing:</u> Personal data is processed to:</p> <ol style="list-style-type: none"> <li>1. make arrangements for the customer's chartered flight,</li> <li>2. ensure compliance with official regulations, including ensuring the fulfilment of obligations related to the crossing of the Finnish border and customs obligations,</li> <li>3. issue invoices for the business flight terminal service fees and</li> <li>4. develop the customer experience and the operations of the terminal.</li> </ol> <p><u>Legal basis for data processing:</u></p> <ul style="list-style-type: none"> <li>• 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 (purpose 1);</li> <li>• Processing is necessary for compliance with a legal obligation to which the controller is subject (purpose 2);</li> <li>• Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (purpose 1, billing, development of operations and statistics).</li> </ul>
<p><b>6. Recipients of Personal Data</b></p>	<p>The data required for invoicing the business terminal service fees, such as the details of the aircraft and the number of passengers, will be transferred to Finavia's financial management system.</p> <p>The data is transferred to the ERP system provider (Amsterdam Software B.v.), which maintains the ERP software on a platform provided by Amazon Web Services in the EU, as well as on a backup server provided by Microsoft Corporation.</p> <p>Data will be disclosed to the authorities in accordance with section 5.2: The Finnish Border Guard, Customs, Traficom.</p>

<p><b>7. Processed Data Contents</b></p>	<ul style="list-style-type: none"> <li>• Information about the number of passengers related to the arrangement of the flight (need related to the provision of Finavia's service)</li> <li>• Personal data required by the authorities to fulfil border and customs obligations, such as the passenger's name, nationality, gender, personal identity code and passport number.</li> </ul>
<p><b>8. Data Sources</b></p>	<p>The data is obtained from the organization that arranges the flight and orders the business flight terminal services.</p>
<p><b>9. Transfer of Personal Data to the Countries Outside of the European Union or the European Economic Area</b></p>	<p>The data is transferred for backup purposes to a server located in the United States of America. The basis for the transfer is the standard contractual clauses approved by the EU Commission for transfers to third countries in the data transfer agreements between the data exporter and the data importer, the effectiveness of which is ensured by means of the necessary supplemental measures.</p> <p>It is possible for the data subject to be informed of the content of the safeguards to be applied for transfers by submitting a request in accordance with section 17.</p>
<p><b>10. Data Retention Period</b></p>	<p>The data of persons related to the business flight will be anonymised when all arrangements related to the chartered flight have been made in accordance with the agreement. The remaining anonymised data will be retained until further notice.</p> <p>The chartered flights are invoiced to the customer, in which case the data transferred to the financial management system concerning the payer of the service provided by Finavia, flight data and passenger numbers data are stored in the financial management system for six years in accordance with provisions of the Accounting Act.</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><b>11. Data Protection Principles</b></p>	<p>Personal data 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.</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 data. Anyone having access to the data 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 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, or that his/her personal data is not processed. 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. Refer to section <b>17. Communications</b> for detailed instructions.</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>Not applicable to this processing.</p>
<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>Not applicable to this processing.</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 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><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, who wishes to inspect personal data concerning him/her in the manner described in section 12 of this Privacy Policy or to use any other right based on law, must submit a request to this effect either</p> <ul style="list-style-type: none"> <li>a. by using the Data 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> (<i>recommended</i>), or</li> <li>b. in a personally signed or otherwise comparably verified document</li> </ul> <p>The request in writing (alternative b above) must be submitted 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 shall not be used for automated decision-making or profiling the data subjects.</p>
<p><b>19. Changes to the 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 or in another appropriate way. 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>