

**PRIVACY POLICY**

**Date:** April 19, 2022 (update)

**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: Ari Pietilä Title: Noise Management Manager Street address: Finavia Corporation, Lentäjätie 3 Postal address: P.O. Box 50, 01531 Vantaa Phone: +358 400 556 1542 Email: ari.pietila(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>Flight data register for environmental issues</p>
<p><b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b></p>	<p>Radar records and flight plan data are processed in the system for the following purposes and in connection with the processes/tasks mentioned below:</p> <ul style="list-style-type: none"> <li>• for the planning and development of airspace and flight procedures (1, 2);</li> <li>• in relation to environmental permit applications (1);</li> <li>• for the preparation of noise and fuel consumption reports (1);</li> <li>• for the preparation of noise management plans (1);</li> <li>• in the assessment of environmental impacts (1);</li> <li>• for efficiency and safety analyses [e.g. flight path, profile, airspace usage efficiency] (1, 2);</li> <li>• as a data source in connection with responding to noise complaints and requests for information from stakeholders (1, 2); and</li> <li>• as a data source in connection with investigating accidents and incidents (1).</li> </ul> <p>The legal bases - Data processing is necessary for:</p> <ol style="list-style-type: none"> <li>1. compliance with a statutory obligation of the controller, and/or</li> <li>2. the purposes of the legitimate interests pursued by the controller or by a third party.</li> </ol> <p>The legal bases applicable to each of the processing purposes are numerically indicated in connection with the concerned processing purpose.</p>

	<p>Statutory obligations are included in, for example, the following regulations:</p> <p>Environmental Protection Act, Environmental Noise Directive (2002/49/EC), EU Regulation 376/2014 on the reporting, analysis and follow-up of occurrences in civil aviation.</p> <p>The legitimate interests pursued by the data controller or a third party arise from the fact that they must be able to conduct and develop business in ways not directly required by law. These interests are apparent in the context of the processing purposes listed.</p>
<b>6. Recipients of Personal Data</b>	<p>With regard to the development of processing and analysis software for radar records, the records can be transferred to a software consultant who processes them for the purpose of testing software, destroying the material at the end of each development project.</p> <p>For the purposes of investigating accidents and safety occurrences, the data is processed at the individual flight level. For these purposes, the data can be shared with the Safety Investigation Authority.</p>
<b>7. Data Contents of the register</b>	<p>Radar records from air traffic (1) and flight plan data (2) are recorded in the register. The data items that can be identified from them include:</p> <ul style="list-style-type: none"> <li>• ICAO designator of aircraft (1, 2)</li> <li>• Call sign of flight (1, 2)</li> <li>• Transponder code(1, 2)</li> <li>• Actual route of flight as detected by the mosaic radar system maintained by Fintraffic lennonvarmistus Oy, mainly from airborne phase of flight (1)</li> <li>• Planned route from flight plan (2)</li> <li>• Speed when airborne (1)</li> <li>• Altitude when airborne (1)</li> <li>• Flight date and time at actual waypoints (1,2)</li> <li>• Departure and destination aerodrome (1,2)</li> <li>• Flight rule (2)</li> <li>• Flight type (2)</li> <li>• Flight category (2)</li> <li>• Wake turbulence category (2)</li> <li>• Navigation performance qualifications during the concerned flight – combination of aircraft and pilot navigation qualifications (2)</li> </ul> <p>However, data subjects cannot be identified on the basis of the information contained in the register.</p>
<b>8. Data Sources</b>	<p>The radar records (1) and flight plan data (2) are obtained from Fintraffic lennonvarmistus Oy.</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>Personal data shall not be disclosed or transferred outside European Union/European Economic Area.</p>

<b>10. Data Retention Period</b>	The radar records and flight plan data are stored in the register until further notice.
<b>11. Data Protection Principles</b>	<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>
<b>12. Right of Access and its Implementation</b>	<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 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>).</p>
<b>13. Right to Data Portability</b>	<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>
<b>14. Right to Withdraw Consent</b>	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.
<b>15. Rectification, Deletion and Restriction of Processing of Data</b>	<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 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>).</p>
<b>16. Right to Lodge a Complaint</b>	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.
<b>17. Communications</b>	<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 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>).</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>
<b>18. Automated Decision-Making and Profiling</b>	The data in the register shall not be used for automated decision-making or profiling the data subjects.
<b>19. Changes to Privacy Policy</b>	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

	<p>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>20. Description of update changes</b></p>	<p><u>April 19, 2022:</u></p> <p>Contact person information is updated in section 2.</p> <p>The description of the legitimate interests of the data controller or a third party is supplemented in section 5.</p> <p>A description of the non-identifiability of the data subjects is added in section 7.</p> <p>The name of the air navigation services provider is updated in sections 7 and 8.</p> <p>Added a new section <b>14. Right to Withdraw Consent.</b></p> <p>In sections 12, 15 and 17: Added reference to Data Subject Access Request form available on Finavia’s website.</p>