

PRIVACY POLICY

Date: 22 May, 2018

EU General Data Protection Regulation, articles 13 and 14

<p>1. Data controller</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>2. Contact Person(s) for filing system related matters</p>	<p>Name: Kaisa Ristolainen Title: Application specialist Street address: Finavia Corporation, Lentäjätie 3 Postal address: P.O. Box 50, 01531 Vantaa Phone: +358 20 708 3361 Email: kaisa.ristolainen@finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Data Protection Officer of Finavia Corporation email: tietosuojavastaava@finavia.fi Phone: +358 20 708 2828</p>
<p>4. Name of register</p>	<p>Register for Finavia Corporation's security check reporting system</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p>The security check reporting system processes events detected during security checks and guard duties.</p> <p>The purpose of the system is to guarantee the legal protection and safety of the employees, to protect the data and property of the employer, employees and customers as well as to prevent and investigate crimes. In situations involving criminal activity, the data in the register is used to clarify the events and identify the individuals involved.</p> <ul style="list-style-type: none"> • The purpose of the personal data in the register is to enhance the information gathering process of security check activities with regard to various security check and guarding measures. The customer-related measures recorded in the system are automatically archived and available in real time. <p>The personal data can be used for the following purposes:</p> <ul style="list-style-type: none"> - For access control to ensure the safety of the airport and air travel - To monitor and improve customer experience (e.g. customer feedback process) - For statistical purposes - To meet official obligations - To prevent misuse <p>The legal basis for the processing is:</p> <p>a) the implementation of a contract to which the data subject is a party or the implementation of pre-contractual measures at the request of the data subject (e.g. a subscription/order for services provided by Finavia to its customers).</p>

	<p>b) the processing is necessary to comply with a statutory obligation of the controller (such as an employment relationship or, for example, access control at airports, security check of passengers and hand luggage).</p> <p>c) the data subject has given their consent to the processing of personal data for one or more specific purposes (e.g. processing related to the removal of prohibited items and materials from luggage).</p> <p>d) the processing is necessary for the implementation of the legitimate interests of the controller or a third party.</p> <p>The processing of personal data is based on the statutory obligation of the airport operator to implement airport security measures (item b). The security regulations are based on the Aviation Act (864/2014), the Decree on the Transport of Dangerous Goods by Air (443/2014) and the EU Security Regulation (300/2008).</p>
<p>6. Recipients of Personal Data</p>	<p>The personal data collected in the register shall be disclosed in a controlled manner only for the purposes in accordance with this Privacy Policy. Secure data processing and transfer methods shall be followed when disclosing material. Each disclosure of material shall be documented.</p> <p>Data may be disclosed to:</p> <ul style="list-style-type: none"> - A competent authority in cases provided for separately by law, for example, to investigate a crime. - The contact person of an employee’s employer, if required by the person’s employment relationship. <p>The above disclosure of data is always based on a justified, written and individual request submitted by the recipient.</p> <p>In addition, data can be:</p> <ul style="list-style-type: none"> - transferred to system providers for testing related to the technical development of the system, which cannot be performed without the actual data contained in the register, - or disclosed to the persons performing the further processing of prohibited items and materials removed from passengers. <p>The data collected in the register shall not be disclosed for commercial purposes.</p>
<p>7. Data Contents of the register</p>	<p><u>Categories of data subjects:</u></p> <ul style="list-style-type: none"> • Employees performing security checks or guard duties, their superiors and representatives of Finavia responsible for security measures • Passengers <p><u>Data collected by the category of data subjects:</u></p> <p>Employees:</p> <ul style="list-style-type: none"> • Name of the person • Staff number • User level and validity period of the user level • Description of the event <p>Passengers:</p> <ul style="list-style-type: none"> • Name of the passenger

	<ul style="list-style-type: none"> • Flight number • Flight destination • Passenger type (transfer/local) • Description of the event
8. Data Sources	<p>Personnel data is obtained from the companies performing security checks and guard duties. The access rights to the system are created either by the company itself or a representative of Finavia. The term of access rights and ID card number are obtained from the ID card issued by Finavia.</p> <p>Passenger data is obtained from the passenger or, if the passenger is unavailable, from the unique suitcase tag printed on the suitcase by the airline.</p>
9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area	<p>The data in the register shall not be disclosed or transferred outside the European Union or the European Economic Area.</p>
10. Data Retention Period	<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>
11. Data Protection Principles	<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>
12. Right of Access and its Implementation	<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</p>

	<p>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>13. Right to Data Portability</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"> 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.
<p>14. Right to Withdraw Consent</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>15. Rectification, Deletion and Restriction of Processing of Data</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>16. Right to Lodge a Complaint</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>17. Communications</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>18. Automated Decision-Making and Profiling</p>	<p>The data in the register shall not be used for automated decision-making or profiling the data subjects.</p>
<p>19. Changes to Privacy Policy</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>