

**PRIVACY POLICY**

**Date:** August 3, 2023 (for update summary, see section 0)

**EU General Data Protection Regulation, articles 13 and 14**

<p><b>1. Data controller</b></p>	<p>Finavia Corporation (hereinafter also "Finavia") 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 processing related matters</b></p>	<p>Name: Minna Asikainen Title: Product Owner Street address: Lentäjätie 3, 01530 Vantaa Phone: +358 20 708 2907 Email: minna.asikainen(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>Customer register for Finavia Corporation online services</p>
<p><b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b></p>	<p>Personal data is processed for maintaining and developing Services, i.e. Finavia's own services and services of Finavia's partners delivered through Finavia's online services, and for:</p> <ul style="list-style-type: none"> <li>• maintenance, development and protection against harmful activities directed at services;</li> <li>• advertising on Finavia website, online and other direct marketing as well as opinion polls and market research;</li> <li>• monitoring and improving the customer experience;</li> <li>• sales, verification of customer transactions, customer service, customer relationship management and development and communications;</li> <li>• delivery, processing and archiving of orders;</li> <li>• management of accounts receivable and to facilitate the payment of refunds, if necessary and</li> <li>• analysis, statistics and profiling of customers and usage of services related to the aforementioned purposes.</li> </ul> <p>Services include, e.g. airport parking and parking ancillary services and airport lounges.</p> <p>Legal basis for processing:</p> <ul style="list-style-type: none"> <li>• Performance of a contract to which the data subject is party</li> <li>• Performance of a contract that has been preceded by the steps taken at the request of the data subject prior to entering into a contract (e.g. order/contract for the services provided to Finavia's customers)</li> <li>• The data subject has given consent to the processing of personal data for one or more specific purposes (direct marketing).</li> <li>• Legitimate interests pursued by the data controller or by a third party (analysis, statistics and profiling of customers and</li> </ul>

	<p>usage of services; and management of accounts receivable; and payment of refunds)</p> <ul style="list-style-type: none"> <li>• Legal obligations to which the controller is subject (e.g. protection against harmful activities directed at the services).</li> </ul>
<p><b>6. Recipients of Personal Data</b></p>	<p>Finavia may transfer or disclose the customer data to the partners whose services the customer is using through Finavia's online services, and to the parties who enable the processing of information relating to an advance purchase of a service, service communications, marketing or customer research, and to those who develop Finavia's digital services.</p> <p>For example, the Amazon SES (Simple Email Service) service is used for customer communications and the services provided by Arena Interactive Oy for the transmission of text messages. Information related to the maintenance, development, marketing or protection of services is transferred to Dagmar Oy; to Futurice Oy; to Wunder Finland Oy, to Enfo Oyj, to Google and to Microsoft for problem solving purposes.</p> <p>Additionally, when there is an agreement between Finavia and an airline to take into account the purchase of parking in the airline's loyalty program and if the customer submits the loyalty program number (e.g. Finnair Plus number) in connection with an advance parking purchase, Finavia may disclose to the airline whose loyalty program the customer belongs to the purchase data necessary for accruing to the customer's account.</p> <p>Anonymous customer information may be transferred or disclosed, for example to Google Analytics for service development purposes.</p> <p>Finavia will not disclose data for commercial purposes.</p>
<p><b>7. Processed Data Contents</b></p>	<p>The following data may be collected in the register:</p> <ul style="list-style-type: none"> <li>• customer contact and other basic information, e.g., name, e-mail addresses, telephone numbers and other information provided by the customer;</li> <li>• data related to the installation, deployment, usage management and monitoring of Finavia's online services, including registration information, such as username, nickname, password, and any other unique identifier; terminal IP address, tags, make, model, manufacturer and operating system;</li> <li>• data required for each specific service, e.g., vehicle registration number, potential promotional code etc.;</li> <li>• information pertaining to the customer relationship, such as invoicing and payment information, product and order information, customer feedback and contact information, as well as cancellation information;</li> <li>• data related to the implementation of communications;</li> <li>• data related to the use of the Services, such as browsing and search information, and user profile information based thereon;</li> <li>• information required to protect against bots<sup>1</sup>;</li> <li>• information about interests possibly provided by the customer;</li> </ul>

<sup>1</sup> To protect several services available via Finavia's website from the harmful effects of bots, Google's reCAPTCHA service is used in an effort to allow people the use of concerned services, but to prevent bots from abusing them.

	<ul style="list-style-type: none"> <li>• any permissions and consents given by the customer and opt-out of direct marketing; and</li> <li>• data collected on the basis of Service-specific consent or general consent given by the customer;</li> </ul> <p>Finavia uses the customer's terminal identifiers and Finavia and its contractual partner cookies stored on this terminal for targeting advertising services to the customer in Finavia's applications and Internet services.</p>
<p><b>8. Data Sources</b></p>	<p>Data necessary for a customer registration or reserving and providing a specific service and provided by the customer is stored in the customer register. Finavia collects data on the usage of Services, website and other service channels using, e.g. systems, as well as Finavia's proprietary analytics, as well as the analytics services of its contractual partners, involving the use of cookies, device identifiers or other similar techniques.</p> <p>Data may also be obtained from the direct marketing opt-out register (Robinson list) maintained by the Finnish Direct Marketing Association and the Population Register Centre, from Posti (the Finnish postal service) and contact information registers of other parties and from other public registers.</p> <p>We obtain the data on payments made by the customer for the parking advance reservation service at Helsinki-Vantaa airport, which are required for the managements of accounts receivable, from our payment service provider Checkout Finland Oy.</p>
<p><b>9. Transfer of Personal Data to Countries Outside of the European Union or the European Economic Area</b></p>	<p>Data may also be transferred or disclosed outside the EU or the European Economic Area for the aforementioned purposes, in accordance with applicable laws. When transferring personal data to third countries, appropriate safeguards will be provided, based on:</p> <ul style="list-style-type: none"> <li>• an adequacy decision approved by the EU Commission,</li> <li>• a data transfer agreement with the importers in accordance with the EU standard contract clauses or</li> <li>• other transfer mechanisms permitted by law.</li> </ul> <p>Transfer of personal data to Google in the USA in order to prevent misuse of network services are safeguarded in accordance with the standard contract clauses drawn up by the EU Commission and by basing the transfer on the adequacy decision published by the EU Commission on July 10, 2023 concerning personal data transfers to the USA [EU C(2023) 4745].</p> <p>In addition, for the purpose of developing Finavia's services, information related to web traffic is transferred to Google Analytics service in anonymized form.</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 processed as obtained from the data sub-</p>

	<p>ject or from another source mentioned in section 8 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 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> <ol 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>b) The processing is carried out by automated means, and;</li> <li>c) If the transmission is technically possible.</li> </ol>
<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 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</p>

	<p>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>
<b>16. Right to Lodge a Complaint</b>	<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>
<b>17. Communications</b>	<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> <ol style="list-style-type: none"> <li>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> (recommended), or</li> <li>in a personally signed or otherwise comparably verified document</li> </ol> <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>
<b>18. Automated Decision-Making and Profiling</b>	<p>The data shall not be used for automated decision-making or profiling the data subjects.</p>
<b>19. Changes to the Privacy Policy</b>	<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>
<b>20. Prohibition on Direct Marketing</b>	<p>The data subject has any time the right to object to processing of personal data concerning him or her for direct marketing purposes.</p>

<b>21. Summary of update changes</b>	<p><u>Update on November 19, 2021:</u></p> <ul style="list-style-type: none"><li>• Contact person information has been changed in section 2.</li><li>• As a result of the discontinuation of the Helsinki Airport mobile application service, a number of amendments to this policy became necessary: The name of the register was changed in section 4, and all references to services used in connection with the mobile app have been removed in many sections.</li><li>• Additionally, information on appropriate safeguards provided to secure data transfers to third countries have been updated in section 9.</li></ul> <p><u>Update on February 16, 2022:</u></p> <ul style="list-style-type: none"><li>• Changes caused by the introduction of promotional codes for vehicle parking are taken into account in section 7;</li><li>• The effects on text of changes in subcontractors are taken into account in sections 6 and 9; and</li><li>• Clarified section 10 by adding reference to 'another source'.</li></ul> <p><u>Update on August 3, 2023:</u></p> <ul style="list-style-type: none"><li>• The information of the document has been migrated to the new form where the division of the description of communications between sections 12, 15 and 17, as well as the section numbering -from section 16 onwards has been changed.</li><li>• Protection against harmful use of the services has been included in the description of processing purposes in section 5.</li><li>• The description of recipients supplemented in section 6.</li><li>• The list of processed categories of personal data supplemented in section 7.</li><li>• The description of the information provided by the customer him-/herself has been supplemented in section 8.</li><li>• The description of transfers of personal data to third countries updated in section 9.</li></ul>
--------------------------------------	---