

PRIVACY POLICY

Date: 19 June, 2018 (translated from last revised Finnish version)

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: PL 50, 01531 Vantaa Phone (PABX): 020 708 000</p>
<p>2. Contact Person(s) for filing system related matters</p>	<p>Name: Aho Terhi Title: eCommerce Manager Street address: Lentäjätie 3, 01530 Vantaa Phone: +358 20 807 2325 Email: terhi.aho(at)finavia.fi</p> <p>Name: Närvänen Carita Title: Development Manager Street address: Lentäjätie 3, 01530 Vantaa Phone: +358 20 807 2147 Email: carita.narvanen(at)finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Data Protection Officer of Finavia Oyj email: tietosuojavastaava@finavia.fi Phone: 020 708 2828</p>
<p>4. Name of register</p>	<p>Customer register for Finavia Corporation mobile and online services</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</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 mobile and online services, and for:</p> <ul style="list-style-type: none"> • advertising on Finavia website and mobile apps, online and other direct marketing as well as opinion polls and market research; • monitoring and improving customer experience; • sales, verification of customer transactions, customer service, customer relationship management and development and communications; • delivery, processing and archiving of orders; • management of accounts receivable and to facilitate the payment of refunds, if necessary, • and for analysis, statistics and profiling of customers and usage of services related to the aforementioned purposes. <p>Services include, e.g. airport parking and restaurant services and airport stores.</p> <p>Legal basis for processing:</p> <ul style="list-style-type: none"> • performance of a contract to which the data subject is party • 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)

	<ul style="list-style-type: none"> the data subject has given consent to the processing of personal data for one or more specific purposes.
<p>6. Recipients of Personal Data</p>	<p>Finavia may transfer or disclose the customer data to the partners whose services the customer is using through Finavia's mobile and online services, and to the parties who enable service communications, marketing or customer research, and to those who develop Finavia's digital services. Additionally, if the customer submits a 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 to third parties, such as Google Analytics and AppsFlyer for service development purposes.</p> <p>Finavia will not disclose data for commercial purposes.</p>
<p>7. Data Contents of the register</p>	<p>The following data may be collected in the register:</p> <ul style="list-style-type: none"> customer contact and other basic information, e.g. name, e-mail addresses, telephone numbers and other information provided by the customer data related to the installation, deployment, usage management and monitoring of Finavia's mobile apps and online services, including registration information, such as user name, nickname, password, and any other unique identifier; terminal IP address, tags, make, model, manufacturer and operating system data required for each specific service, e.g. vehicle registration plate, location data and other 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; data related to the implementation of communications; data related to the use of the Services, such as browsing and search information, and user profile information based thereon; interest information possibly provided by the customer; any permissions and consents given by the customer and opt-out of direct marketing; and data collected on the basis of Service-specific consent or general consent given by the customer; <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>8. Data Sources</p>	<p>Data provided by the customer is stored in the customer register. Finavia collects data on the usage of Services, the mobile app, website and other service channels using, e.g. systems, as well as Finavia's proprietary analytics, as well as the analytics services of</p>

	<p>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>9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area</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.</p> <p>Anonymous data in the register is regularly transferred to Google Analytics and AppsFlyer for the purposes of service development, and personal data to MailChimp and Twilio for transmitting reservation, registration, purchase transaction and marketing messages.</p> <p>Personal data is transferred using the EU-US Privacy Shield arrangements.</p>
<p>10. Data Retention Period</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>11. Data Protection Principles</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>12. Right of Access and its Implementation</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>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</p>

	<p>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>
16. Prohibition on Direct Marketing	<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>
17. Right to Lodge a Complaint	<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>
18. Communications	<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>
19. Automated Decision-Making and Profiling	<p>The data in the register shall not be used for automated decision-making or profiling the data subjects.</p>
20. Changes to Privacy Policy	<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>