

PRIVACY POLICY

Date: 21 April, 2020 (updated contact person)

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: Kirsi Luhta Title: Communications Expert Street address: Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa Phone: +358 20 708 2101 Email: kirsi.luhta(at)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>User register for Finavia Corporation's Airportal extranet</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p>The purpose of data processing is to enable users to access to Airportal extranet and to use associated services.</p> <p>To grant access rights to other electronic services provided by Finavia for stakeholders who operate at the airport, personal data is transferred to these systems.</p> <p>Legal basis for the processing of personal data, with respect to the personnel of the Finavia Group, is to enable the fulfilment of the legal rights of the employer stemming from the data subject's labour contract or a service contract.</p> <p>With respect to other data subjects, the legal basis for personal data processing is the enforcement of a contract to which the data subject is a party or ordering a service which Finavia Corporation provides to its customers or any other agreement with the employer of the registered upon service provision.</p>
<p>6. Recipients of Personal Data</p>	<p>Finavia uses an outsourced service provider for maintenance and development of the register. The service provider may process personal data when it is necessary for maintaining or developing the register.</p>
<p>7. Data Contents of the register</p>	<p>The following data about a person is collected:</p> <ul style="list-style-type: none"> • Identifier used to identify a user • Personal contact information: <ul style="list-style-type: none"> - Last name - First name(s) - Title (e.g. CEO) - Organization - E-mail address - Mobile phone number

<p>8. Data Sources</p>	<p><u>With regard to data subjects employed by the Finavia Group:</u> Data is partly collected from the person him-/herself, or the subscriber to the service and partly from that register of Finavia Corporation in which data associated with the data subject's employment relationship is stored.</p> <p><u>With regard to data subjects employed by Air Navigation Services Finland Oy:</u> Data is partly collected from the subscriber to the service who can be a registered him-/herself or a representative of his/her employer. For the time being, the data of Air Navigation Services Finland Oy personnel is still partly retrieved from the same system as that of those working for the Finavia Group (a register where Finavia Corporation processes personal data on behalf of Air Navigation Services Finland Oy). Once Finavia Corporation discontinues to process personal data on behalf of ANS Finland, all personal data will be collected from the subscribers to the service.</p> <p><u>With regard to other stakeholders outside the Finavia Group:</u> Data is collected from the subscriber to the service, who may be the data subject him-/herself or a representative of the employer.</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 is not disclosed or transferred outside of the European Union or the European Economic Area.</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>If the user has not logged into the Airportal service during the last year, his/her username will be automatically erased. Upon request by the user to discontinue his/her access rights to the system or to terminate the message transmission service, the username will be deleted without undue delay.</p> <p>The erasure of personal data of those external users whose access rights are bound to organizational data (of their employer), the data will be erased on the expiry date of the respective organization.</p> <p>Personal data of Finavia Group's personnel will be erased from Airportal after the expiration of employment within 6 days from disabling the user account in the Windows domain user database (Active Directory).</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 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.</p>
<p>16. Prohibition on Direct Marketing</p>	<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>
<p>17. 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>18. 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>19. 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>20. 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</p>

	<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>
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