

PRIVACY POLICY

Date: 25 May, 2018 (up-dated 6 June, 2018)

EU General Data Protection Regulation, articles 13 and 14

Note: This policy is translated from 6 June, 2018 up-date, containing all up-dates till that date.

<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: Teija Räisänen, Controller Street address: Kuopion lentoasema Lentokentätie 275, 70900 TOIVALA Phone: 020 708 7214 email: teija.raisanen@finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Data Protection Officer of Finavia Corporation email: tietosuojaavastaava@finavia.fi Phone: 020 708 2828</p>
<p>4. Register</p>	<p>The register for the financial management system Microsoft Dynamics NAV 2017</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p>The purpose of the processing of personal data in the financial management system is to handle the purchase and sales ledger, invoicing, fixed assets accounting and general ledger accounting.</p> <p><u>Legal basis for data processing:</u></p> <ul style="list-style-type: none"> a) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; [The implementation of service (a product or a right) sold by Finavia Corporation to the customers and its invoicing, as well as products and rights purchased by Finavia from other parties]; b) processing is necessary for compliance with a legal obligation to which the data controller is subject – enabling the implementation of the employer's obligations and rights arising from the employment relationship [e.g. travel and expense invoices]; c) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party [invoicing receivables and receivables which are possibly being submitted for recovery].
<p>6. Recipients of Personal Data</p>	<p>Sales invoices are submitted to the customers through the CGI Finland Oy invoicing hotel, whereby the necessary personal data will be transferred to the company.</p>

	<p>If Finavia Corporation has to recover delinquent accounts receivable, the personal data necessary for the purposes of collection actions will be disclosed to the debt collection agency controller (currently Lindorff Oy) in connection with the collection assignment.</p> <p>Upon request, data may be disclosed to auditors, tax authorities, internal audit, statistics, and for the purposes of reporting, to authorised parties in order to perform statutory duties as well as to other authorities, as appropriate, on the basis of the legal obligation to which the data controller is subject.</p> <p>Finavia shall not disclose data for commercial purposes.</p>
<p>7. Data Contents of the register</p>	<p>Financial management system has the supplier and customer registers which list natural and legal persons who are either the customers or suppliers of Finavia Corporation.</p> <p>The supplier register contains the business ID, name, address, telephone number, contact person, fax number, website, country/area code, e-mail address, bank account details and prepayment register information, balance and invoices.</p> <p>The customer register contains the business ID, name, address, telephone number, contact person, fax number, website, country/area code, e-mail address, company's EDI code and operator code, balance, invoices and payment transactions.</p> <p>The travel invoicing system holds information about the person's name and reimbursements for travel expenses in euros.</p> <p>The permit invoicing system holds information about the company, the person's name and the services sold.</p> <p>The lease management system and lease system for commercial services hold information about the company, the person's name and the leased premises, in euros.</p> <p>The traffic invoicing system holds information about the company, the person's name and the services sold. In regard to the sale of season cards, the information is available about the company/association, business ID, the customer's name and e-mail address, the aircraft registration number, the aircraft MTOW (maximum takeoff weight) and the period of validity of the season card.</p> <p>The parking system and other sales hold information about the company, the person's name and the services sold.</p> <p>Software user rights are maintained manually and contain the name, user ID and access rights. The software can only be used when logged into Finavia Corporation's secure network. Only the administrators have the rights to add access rights.</p>
<p>8. Data Sources</p>	<p>Data for the financial management system are obtained from Finavia's billing interfaces, customers, suppliers and travel invoicing system. Data on the payments are obtained from banking software.</p> <p>The conditional access system contains the requests related to access rights.</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 shall not be transferred or disclosed outside the EU/ETA, as a rule. If the transfer outside the aforementioned area becomes necessary later, the protection of personal data will be ensured by adopting a mechanism approved by the European Union, unless the country of destination is directly approved by the European Union as the country of destination for personal data. In this event, this Privacy Policy will be updated without undue delay.</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</p>

	<p>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; b) The processing is carried out by automated means, and; c) If the transmission is technically possible.
14. Right to Withdraw Consent	<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>
15. Rectification, Deletion and Restriction of Processing of Data	<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>
16. 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>
17. 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.</p>

	<p>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>
18. Automated Decision-Making and Profiling	The data in the register shall not be used for automated decision-making or profiling the data subjects.
19. Changes to Privacy Policy	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.