

PRIVACY POLICY

Date: May 25, 2018

EU's General Data Protection Regulation (GDPR), articles 13 and 14

<p>1. Data controller</p>	<p>Finavia Corporation VAT Number: FI23025702 Street Address: Lentäjätie 3, 01530 Vantaa, Finland Postal Address: P.O. Box 50, 01531 Vantaa, Finland Tel. +358 20 708 000</p>
<p>2. Contact Person(s) for filing system related matters</p>	<p>Annika Kåla, Communications Manager Street Address: Lentäjätie 3, 01530 Vantaa, Finland Postal Address: P.O. Box 50, 01531 Vantaa, Finland Tel. +358 20 708 000 comms@finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>E-mail: tietosuojavastaava@finavia.fi Tel. +358 20 708 2828</p>
<p>4. Register</p>	<p>Subscribers of Finavia Corporation's newsletters (Finavian uutiskirje and Helsinki Airport Newsletter)</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p>The purpose of the register is to store and maintain information of the subscribers to the Finavia Corporation newsletters so that Finavia is able to send the newsletter to the subscribers. The legal basis for the processing of personal data is the consent given by the data subject.</p>
<p>6. Recipients of Personal Data</p>	<p>Finavia Corporation does not transfer or disclose personal data for commercial purposes.</p> <p>On behalf of Finavia, the personal data of the subscription registry is processed by the Finnish company Viestintäpalvelu Taika Oy concerning the sending of newsletters and the development of the service.</p> <p>Finavia Corporation transfers data to the MailChimp email service for the purpose of sending the newsletters.</p>
<p>7. Data Contents of the register</p>	<p>The register contains personal data relating to newsletter subscription including:</p> <p><u>Subscriber data:</u> First name, last name and email address of the subscriber, the company or organisation they represent, the name of the newsletter subscribed to and the date on which the subscription data has last been updated.</p> <p><u>Information pertaining to communications and their development:</u> Activity information, such as the amount of newsletters opened, the amount of different news pieces in the newsletter, subscription cancellation and newsletter delivery.</p>

<p>8. Data Sources</p>	<p>Personal data concerning the subscriber to the newsletter is primarily collected from the data subject.</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>Finavia Corp. uses the MailChimp email service for sending the newsletters, for maintaining the address data file and for the improvement of content.</p> <p>The following information is transferred to MailChimp concerning the user: first name, last name, email address, name of newsletter the person has subscribed to and the name of company or organisation represented by the subscriber in case the subscriber has given this information when subscribing to the newsletter.</p> <p>MailChimp is a company located in the United States of America and personal data is transferred to it beyond the boundaries of the European Union and European Economic Area. MailChimp participates the Privacy Shield frame established between the EU and USA and declares that it complies with the EU’s General Data Protection Regulation. Further information: MailChimp.</p>
<p>10. Data Retention Period</p>	<p>Finavia Corp. 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. 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>11. Data Protection Principles</p>	<p>Data shall be stored in electronic systems protected by firewalls, passwords, and other appropriate technical solutions. Only designated persons employed by Finavia Corp. 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 Corp. 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 defense 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</p>

	<p>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>
16. Right to Lodge a Complaint	<p>The data subject has the right to lodge a complaint with the supervisory authority if Finavia Corp. has not complied with the applicable legislation governing data protection in its operations.</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 Corp. may request the data subject to specify the request and verify his or her identity before processing the request. Finavia Corp. may refuse to execute the request based on the provisions of applicable law.</p> <p>Finavia Corp. 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	<p>The data in the register shall not be used for automated decision-making or profiling the data subjects.</p>
19. Changes to Privacy Policy	<p>Finavia Corp. 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 Corp. recommends that the data subjects check the contents of the Privacy Policy on a regular basis.</p>