

PRIVACY POLICY

Date: August 1, 2022 (for update summary, see section 20)

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 processing related matters</p>	<p>Name: Liinu Lohi Title: Communications Specialist Street Address: Lentäjätie 3, 01530 Vantaa, Finland Postal Address: P.O. Box 50, 01531 Vantaa, Finland Telephone: +358 20 708 2002 Email: comms@finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Contact information of the Data Protection Officer of Finavia Corporation Email: tietosuojavastaava(at)finavia.fi Phone: +358 20 708 2828</p>
<p>4. Name of Register</p>	<p>Register of subscribers to Finavia Corporation’s newsletters (Finavia Newsletter in Finnish and Helsinki Airport Newsletter in English)</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p>The purpose of processing of the registered data is the storage and upkeep of 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 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 Creamailer email service maintained by Creamailer Oy to send the newsletters.</p>
<p>7. Processed Data Contents</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 organization 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 number of times the newsletter was opened, the number of different news items in the newsletter as well as the cancellation and delivery of the newsletter subscription.</p>

<p>8. Data Sources</p>	<p>Personal data concerning the subscriber to the newsletter is regularly collected from the data subject.</p> <p>Information pertaining to communications and their development is obtained from the technical information systems used for the processing.</p>
<p>9. Transfer of Data to the Countries Outside of the European Union or the European Economic Area</p>	<p>Data will not be transferred outside the European Economic Area.</p>
<p>10. Data Retention Period</p>	<p>Finavia Corp. will retain personal data in accordance with the legislation in force and only for as long as necessary for the purposes specified in this Privacy Policy. The data will be permanently erased when the data subject cancels the subscription or withdraws the consent.</p> <p>However, personal data may be stored for a period longer than the aforementioned period due to the obligations under applicable law.</p>
<p>11. Data Protection Principles</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>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 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.</p> <p>Refer to section 17. Communications.</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>Not applicable to this processing.</p>

<p>14. Right to Withdraw Consent</p>	<p>The data subject shall have the right to withdraw the consent and cancel the subscription at any time either by invoking the cancellation link in each newsletter or by submitting 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 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>16. 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>17. Communications</p>	<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"> a. by using the Data Subject Access Request form available on the Finavia website https://www.finavia.fi/en/data-protection (recommended), or b. in a personally signed or otherwise comparably verified document <p>The request in writing (alternative b above) must be submitted or sent via 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>

	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.
18. Automated Decision-Making and Profiling	The data shall not be used for automated decision-making or profiling the data subjects.
19. Changes to the 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.
20. Summary of update changes	<p><u>August 1, 2022</u></p> <p>Contact person information updated in section 2.</p> <p>Sections 6 and 9 of the policy have been updated following the change of the data processor. The description of section 8 has been clarified.</p> <p>Unnecessary information on data sources and updating in section 10. Data Retention Period has been removed and the retention period has been clarified.</p> <p>Added clarification concerning the non-applicability of the right to data portability in section 13.</p> <p>In section 14. Right to Withdraw Consent, the text has been reworded to specify that the right to withdraw consent applies to both the consent and the subscription to the newsletter.</p> <p>Updated information related to the use of the rights of the data subject's inter alia by adding reference to the availability of the Data Subject Access Request form on Finavia's website and by concentrating information on the use of data subject's rights into a single section (in sections 12, 15 and 17).</p>