

**PRIVACY POLICY**

**Date:** 29 October, 2018 (translated from Finnish version/29.10.2018)

**EU General Data Protection Regulation, articles 13 and 14**

<p><b>1. Data controller</b></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><b>2. Contact Person(s) for filing system related matters</b></p>	<p>Name: Nina Vainioranta Title: Service Manager Street address: Finavia Corporation, Lentäjätie 3 Postal address: P.O.Box 50, 01531 Vantaa Phone: +358 20 708 3235 email: <a href="mailto:nina.vainioranta@finavia.fi">nina.vainioranta@finavia.fi</a></p>
<p><b>3. Data Protection Officer</b></p>	<p>Data Protection Officer of Finavia Corporation email: <a href="mailto:tietosuojavastaava@finavia.fi">tietosuojavastaava@finavia.fi</a> Phone: + 358 20 708 2828</p>
<p><b>4. Name of register</b></p>	<p>Helsinki Airport vehicle parking register</p>
<p><b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b></p>	<p>The purpose of processing is to manage the parking service provided for customers of the parking areas of Finavia Corporation and LAK Real Estate at Helsinki Airport, and with respect to this, also to maintain customer relations, to enable invoicing and to prevent misuse.</p> <p>The data can also be used for statistical purposes, for data analyses or for customer research aiming at development of Finavia's service or business streamlining.</p> <p>Legal Basis for Data Processing is that 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 contract may relate to:</p> <ul style="list-style-type: none"> <li>• one-off parking (regardless of payment method) or</li> <li>• long term parking with parking permit<sup>1</sup></li> </ul> <p>This basis is applicable to management of the parking service, invoicing and maintenance of the customer relation.</p> <p>Legal Basis for Data Processing is that processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. This basis is applicable when Finavia use the data for statistical purposes, data analyses or customer research.</p>
<p><b>6. Recipients of Personal Data</b></p>	<p>On a regular basis, Finavia Corporation shall not disclose or transfer collected personal data for purposes other than those defined in this privacy policy document for which Finavia may employ third parties to provide some services (e.g. marketing, customer research, data analytics and other corresponding purposes).</p>

<sup>1</sup> Parking permit can be linked to a Finavia identity card to avoid the need of a physical parking permit (card)

	<p>Personal data shall not be disclosed for commercial purposes other than those described herein.</p>
<p><b>7. Data Contents of the register</b></p>	<p>The following personal data is processed:</p> <p><u>One-off parking:</u></p> <ul style="list-style-type: none"> <li>• Vehicle registration number is detected optically upon parking area entry and stored in the system to enable (upon parking area exit) gate opening based on optical recognition of the registration number (on convenience and safety related grounds to avoid the necessity of introducing the parking coupon to the coupon reader at exit gate).</li> <li>• If parking is pre-booked via Finavia mobile and online services the validity data of the pre-booked parking will be transferred to the register.</li> <li>• If vehicle registration number is received in connection with customer's pre-booking it will be stored in the register to enable automatic opening of the gate based on successful optical recognition of the plate number upon parking area entry.</li> </ul> <p><u>Long term parking contract (linked to a parking permit<sup>1</sup>):</u></p> <ul style="list-style-type: none"> <li>• The parking permit holder's and parking permit buyer's contact information and parking right data (such as validity data).</li> <li>• If the contract defines a certain vehicle registration number the number will be stored in the parking system to enable automatic gate opening upon parking area entry/exit, based on optical recognition of the registration number and a contract/registration number validity check (on convenience and safety related grounds to avoid the necessity of introducing the parking permit or identity card at the gate).</li> </ul>
<p><b>8. Data Sources</b></p>	<p><u>One-off parking:</u></p> <ul style="list-style-type: none"> <li>• In some instances, a vehicle registration number and the data necessary to identify the pre-booking are obtained from the maker of the pre-booking (via the Finavia mobile or online services). Vehicle registration number is collected from the pre-booking data, if supplied. Other data pertaining to the pre-booking will not be stored in this register.</li> <li>• Vehicle registration number is obtained from optical detectors located at the entry/exit gates.</li> <li>• Data relating to parking duration or to duration of the parking right and the associated price of parking is either obtained for the pre-booking or calculated by the system on base of parking entry time and parking payment time (when parking not pre-booked).</li> </ul> <p><u>Parking permits:</u></p> <ul style="list-style-type: none"> <li>• The customer data that will be stored in the register is collected from the parking permit order form filled in by the customer or the representative of an enterprise when the service is contracted.</li> <li>• The person who orders the parking service or the parking permit holder may specify a vehicle registration number to be associated with the parking contract.</li> </ul>

	<p>Finavia Corporation strives to detect the vehicle registration plate number optically in all cases upon parking entry and when successfully recognized it will be stored in the register.</p> <p>REMARK: The data collected as explained above will act as source data when generating statistics and in data analytics.</p>
<p><b>9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area</b></p>	<p>In principle, Finavia shall not disclose or transfer data outside the borders of the European Union or European Economic Area.</p> <p>Should a need arise to transfer or disclose data outside this area the disclosure or transfer will be secured using the European Commission’s standard contractual terms, unless data is disclosed or transferred to a recipient in a country that already, according to a decision by EU Commission, applies an adequate level of data protection.</p>
<p><b>10. Data Retention Period</b></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>Finavia Corporation stores active customer data pertaining to the parking contract in the customer register. Outdated personal data will be erased at least one every year.</p>
<p><b>11. Data Protection Principles</b></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><b>12. Right of Access and its Implementation</b></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</p>

	<p>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><b>13. Right to Data Portability</b></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"> <li>a) The data processing is based on the data subject's consent or a contract between the data controller and the data subject, and;</li> <li>a) The processing is carried out by automated means, and;</li> <li>b) If the transmission is technically possible.</li> </ul>
<p><b>14. Right to Withdraw Consent</b></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><b>15. Rectification, Deletion and Restriction of Processing of Data</b></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><b>16. Right to Lodge a Complaint</b></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><b>17. Communications</b></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><b>18. Automated Decision-Making and Profiling</b></p>	<p>The data in the register shall not be used for automated decision-making or profiling the data subjects.</p>
<p><b>19. Changes to Privacy Policy</b></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 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>