

PRIVACY POLICY

Date: 26 May 2018

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: PL 50, 01531 Vantaa Phone (PABX): 020 708 000</p>
<p>2. Contact Person(s) for filing system related matters</p>	<p>Name: Laura Tiainen Title: Service Manager Street address: Finavia Corporation, Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa Phone: 020 708 3102 Email: laura.tiainen@finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Data Protection Officer of Finavia Corporation email: tietosuojavastaava@finavia.fi Phone: 020 708 2828</p>
<p>4. Name of register</p>	<p>Register related to the assistance system for passengers with disabilities and reduced mobility system (PRM register).</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p>Processing of personal data is necessary for enabling assistance to passengers with disabilities and reduced mobility. The purpose of processing is to conduct the coordination of service to passengers requiring PRM assistance.</p> <p><u>Legal basis for data processing:</u></p> <ol style="list-style-type: none"> 1. processing is necessary for compliance with a legal obligation to which the controller is subject (to organize the PRM service). 2. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (processing of the customer feedback data and service development) <p>The rights of persons with disabilities and reduced mobility is regulated by the European Union regulation EC 1107/2006 according to which airports are responsible for ensuring the provision of assistance to the PRM for travel by air. Air carriers, their agents and tour operators are obliged to notify airports concerning the passenger's need for assistance. This information is transmitted to the PRM system.</p> <p>Airports may provide the assistance to disabled persons and persons with reduced mobility themselves or may contract with third parties for the supply of this assistance.</p>
<p>6. Recipients of Personal Data</p>	<p>Third parties provide the PRM service and process personal data stored in the system when coordinating the daily service for the assisted passengers at the airport.</p>

	<p>The supplier of the PRM system has access to personal data in connection with maintenance service and to enable system development.</p> <p>Personal data of the passengers or employees may be disclosed to Finnish Transport Safety Agency, or to Finavia customer feedback service for supplemental investigation of customer's feedback.</p>
7. Data Contents of the register	<p>The data contents are:</p> <p>Name of the passenger, flight number and special assistance code. The special assistance code contains sensitive data concerning health.</p> <p>The system enables collection of customer feedback based on customer's consent. The customer can voluntarily supply his or her email address and/or phone number and signature.</p> <p>The system stores employee name data and ID card number. An employee can voluntarily supply his or her email address.</p>
8. Data Sources	<p>The data of the passengers are transmitted from the air carriers', its agents' or tour operators' systems to the PRM system when a notification of the need for assistance has been received in advance.</p> <p>Passengers' personal data can also be entered into the system manually when a notification is received later than 48 hours prior to the departure of the flight.</p> <p>Passenger's personal data can also be entered into the system by scanning the data of the passenger's boarding pass.</p> <p>The supplier of the system can manually enter to or remove from the system the personal data of an employee.</p>
9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area	<p>The servers on which data is stored are located within the area of EU/EEA. The supplier of the system is an American company and the data can be processed in the United States of America.</p> <p>A Data Transfer Agreement between Finavia and the system supplier exists in accordance with the standard contractual clauses issued by the European Commission.</p>
10. Data Retention Period	<p>The passengers name data, the assistance code and flight number are retained for 6 months after completion of the assistance. The email address and phone number are retained for a period of 6 months after submission of feedback by the passenger.</p> <p>Employee name data and email address will be erased one year after the expiry of his or her previous system access right.</p> <p>The data retention period is based on a Finavia Corporation policy. Personal data may be required afterwards for customer feedback investigation.</p>
11. Data Protection Principles	<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</p>

	<p>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. 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 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>18. 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>19. 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 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>