

**PRIVACY POLICY**

**Date:** February 4, 2022 (Updated data processor information in clause 6)

**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: Heikki Pöllänen Title: Safety Manager Street address: Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa Email: heikki.pollanen(at)finavia.fi</p>
<p><b>3. Data Protection Officer</b></p>	<p>Data Protection Officer of Finavia Corporation Email: tietosuojavastaava(at)finavia.fi Phone: +358 20 708 2828</p>
<p><b>4. Name of register</b></p>	<p>Safety reporting system</p>
<p><b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b></p>	<p>The law requires all actors in the field of aviation to establish a mandatory safety reporting system. The law also requires employees working in certain functions to report occurrences.</p> <p>Personal data in the system is processed in order to confidentially collect, process and analyse occurrence and other safety data related to:</p> <ul style="list-style-type: none"> <li>• aviation safety,</li> <li>• aviation security,</li> <li>• occupational safety and/or</li> <li>• environmental safety</li> </ul> <p>in order to determine appropriate safety and security measures in accordance with current legislation and authority requirements.</p> <p>Personal data can be used, for example, for contacting people or investigating an occurrence, and as EU regulations stipulate, the data is gathered via authorities into a national database and a European central repository.</p> <p><u>Legal basis for processing:</u> Personal data is collected in order for the controller to fulfil its regulatory responsibilities.</p>
<p><b>6. Recipients of Personal Data</b></p>	<p>Personal data may be transferred to the system maintenance provider for troubleshooting or system development purposes if necessary (Virnex Oy, Finland). The system platform is hosted in Finland by an external service provider Enfo Oyj .</p>

	<p>Data reported by employees of Finavia are provided to the competent authority regularly in cases and to the extent specified by law<sup>1</sup>.</p> <p>In addition to the said regular data disclosure, supplemental data accrued in examination of the event are provided to the competent authority upon request. These supplemental data may include details concerning persons involved in the examination process, such as his or her name.</p> <p>Furthermore, data which are created in the analysis and which are mainly anonymous are disclosed to the competent authority.</p> <p>Subject to agreements established with other aviation operators for the purpose of exchanging confidential safety data, they are provided with data which are by default anonymous but which may in some cases include data from which a person may be identified indirectly, in the form of the identification information of privately-owned aircraft or vehicles operating at the airport area. Finavia has entered into such information exchange agreements with Fintraffic Air Navigation Services Ltd, aviation weather service provider Finnish Meteorological Institute, the Finnish Air Force, and certain airlines.</p> <p>Information required for the processing of a valid claim by an insurance company, in the event of an occupational accident involving Finavia's insured, are provided to the insurance company, as defined in the Workers' Compensation Act 459/2015.</p> <p>Data are not disclosed for commercial purposes.</p>
<p><b>7. Data Contents of the register</b></p>	<p>The complete information collected from the reporter on an occurrence or a safety issue is stored in the information system. It includes the following categories of personal data in due form:</p> <ul style="list-style-type: none"> <li>• Name of the reporter (protected) and personnel group which determines whether or not occurrence reporting is a mandatory duty for him or her</li> <li>• Name of the person identified in the report as a concerned or related party (protected)</li> <li>• Aircraft identifying information and operational phase (indirect personal data)</li> <li>• Identifying information of a vehicle or equipment used in the airport area (indirect personal data)</li> </ul> <p>The report shall also include a free format description of the occurrence or information on the reporter's findings when a safety issue other than a defined safety occurrence is reported.</p> <p>The following categories of personal data are stored in connection with the processing of data collected from the reporter in order to determine appropriate safety risk mitigation measures:</p> <ul style="list-style-type: none"> <li>• Name of the person participating in the processing of safety data and information relating to their job or role.</li> </ul>

<sup>1</sup> The data are anonymous by default but may include personal data in the form of data regarding privately-owned aircraft or aircraft operated by private persons.

	<ul style="list-style-type: none"> <li>• Possible related aircraft identifying information and information on aircraft make/model/series as supplemented in data classification, if the information required by the authority were not submitted by the reporter.</li> </ul>
<b>8. Data Sources</b>	<p>Data are obtained from:</p> <ul style="list-style-type: none"> <li>• the data subject or other data subjects,</li> <li>• parties to confidential information exchange agreements, or aviation operators which are obliged to report to Finavia regarding safety matters, e.g. ground service providers (mainly anonymous data; may include identifying information of aircraft or vehicles that are used in the airport area),</li> <li>• the processing and safety analyses of safety data and determination processes of appropriate safety risk mitigation by Finavia including a possible investigation, and</li> <li>• flight plans if required in the classification process related to an aircraft.</li> </ul>
<b>9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area</b>	Data shall neither be transferred nor disclosed outside the countries of the EU and EEA.
<b>10. Data Retention Period</b>	Safety data are stored for 10 years. The period is determined on the basis of Finavia's responsibility to be able to prove that their employee responsible for aviation occurrence reporting has met his/her statutory responsibility.
<b>11. Data Protection Principles</b>	<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. In particular, the identities of the reporter and persons mentioned in the reports are protected as provided by law.</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>
<b>12. Right of Access and its Implementation</b>	<p>The right of access by the data subject as described below is limited to data provided by data subjects themselves concerning their occupational accident, occupational safety incident or safety related findings to data fields of due form, whereas the rest of the data are confidential safety data not subject to the right of access.</p> <ul style="list-style-type: none"> <li>• 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</li> </ul>

	<p>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> <ul style="list-style-type: none"> <li>• 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 or by using the Subject Access Request form available on the Finavia website (<a href="https://www.finavia.fi/en/data-protection">https://www.finavia.fi/en/data-protection</a>).</li> </ul> <p>NOTE A person with access rights to the safety reporting system may specify the data further using the functions of the system, for example by commenting their own report.</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. Rectification, Deletion and Restriction of Processing of Data</b></p>	<p>The following obligations of the data controller are only applicable to data provided by the data subjects themselves to data fields of due form in a similar manner than the Right of Access is restricted in section 12 of this document:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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</li> </ul>

	<p>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 or by using the Subject Access Request form available on the Finavia website (<a href="https://www.finavia.fi/en/data-protection">https://www.finavia.fi/en/data-protection</a>).</p>
<b>15. Right to Lodge a Complaint</b>	<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>
<b>16. Communications</b>	<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 or by using the Subject Access Request form available on the Finavia website (<a href="https://www.finavia.fi/en/data-protection">https://www.finavia.fi/en/data-protection</a>).</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>
<b>17. Automated Decision-Making and Profiling</b>	<p>The data in the register shall not be used for automated decision-making or profiling the data subjects.</p>
<b>18. Changes to Privacy Policy</b>	<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>