

**PRIVACY POLICY**

**Date:** March 1, 2022

**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: PL 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: Jarmo Lumiaho Street address: Lentäjätie 3, 01531 Vantaa Postal address: P.O. Box 50, FI-01531 VANTAA Phone (PABX): +358 20 708 2828</p>
<p><b>3. Data Protection Officer</b></p>	<p>Data Protection Officer of Finavia Oyj Email: tietosuojavastaava(at)finavia.fi Phone: +358 20 708 2828</p>
<p><b>4. Name of register</b></p>	<p>Register for Controller's Data Protection accountability  (A system for the upkeep of documentation related to data protection and the data subjects' rights, to comply with the accountability)</p>
<p><b>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</b></p>	<p>The main purpose of the processing is to demonstrate that the data controller is compliant with the provisions of EU General Data Protection Regulation (particularly concerning the rights of the data subjects) and to administer the data protection related processes of Finavia.</p> <p><b><u>The legal basis for data processing:</u></b></p> <ul style="list-style-type: none"> <li>• Processing is necessary for compliance with a legal obligation to which the data controller is subject (demonstration of compliance according to EU 2016/679 article 5, applicable to points I thru VI below)</li> <li>• Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (applicable to points IV to VII below).</li> </ul> <p><b><u>Detailed purposes of personal data processing</u></b> <u>Personal data is processed/can be used for the following purposes:</u></p> <ol style="list-style-type: none"> <li>I Documentation of contact by the data subject or by the supervisory authority and the search of the same.</li> <li>II Administration of the data subjects access request within Finavia Corporation.</li> <li>III Contacting the data subjects or for delivering the reply of the controller to the data subject.</li> <li>IV Creation of statistics concerning the use of data subject access rights and anonymous use for other similar purposes</li> <li>V To demonstrate, as may be necessary, that the data subject is exercising his/her legal rights repeatedly.</li> <li>VI Settlement of data protection disputes and preparation of a legal claim or response thereto.</li> <li>VII To improve the liaison process with the data subjects and to further develop the functionality of the application.</li> </ol>

<p><b>6. Recipients of Personal Data</b></p>	<p>Finavia corporation will not disclose personal data stored in this register to third parties, except in case of the authorities' legitimate requests.</p> <p>In case the data subject's request pertains to processing carried out by Finavia on behalf of another controller Finavia will forward the request to the concerned controller including the personal data contained in the request.</p> <p>A third party service provider assists Finavia in maintaining and developing this register. Hence this service provider is able to process also personal data if that is necessary for this particular purpose (Virnex Oy). The information system platform is maintained on behalf of Finavia by an external service provider Enfo Oyj.</p> <p>Finavia Corporation will not disclose personal data of this register for commercial purposes.</p>
<p><b>7. Data Contents of the register</b></p>	<p>With respect to the exercise of data subject's rights or supervisory authority's request for clarification, the following data subject's personal data may be collected:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• email address</li> <li>• phone number</li> <li>• address</li> <li>• indication that the data subject has been identified</li> <li>• method of identification</li> <li>• when and where identification took place</li> <li>• type of request (e.g. which legal right is the data subject exercising or a clarification request by competent authority)</li> <li>• method and date of contact</li> <li>• title of contact/request</li> <li>• detailed description of request's nature</li> <li>• desired method of information delivery</li> <li>• status of processing of the request or contact</li> <li>• date of reply to data request or clarification request</li> <li>• reference number for the case or the issue</li> <li>• the description (detailed record of what the data subject has communicated or how he or she wants to exercise his/her rights or details of the clarification request by the supervisory authority)</li> </ul> <p>In addition, the information contained in the communication between the controller and the data subject or the supervisory authority concerning the request will be stored in the context with each data set. The data controller's replies may contain personal data about the data subject(s) collected and stored in other registers. Where necessary, the data subject's acknowledgement that he or she has gained access to his or her data shall also be recorded if the data is not delivered verifiably.</p> <p>Depending on the case, other relevant data separately provided by the data subject will also be stored. Information related to the verification of identity is processed only to the extent required for verification, and, for example, any copy of the identity certificate is destroyed once the verification has been completed.</p>

	<p>In case of a clarification request by the supervisory authority, the name and contact details of the representative of the authority and, as appropriate, any other information provided by the authority, as well as the controller's response to the authority, shall be recorded.</p>
<b>8. Data Sources</b>	<p>Data will be collected partially from the data subject and partially it will be generated by the controller upon receipt of the data request (e.g. the reference number and date of receipt of the request and issues relating to identification of the data subject). Data may also be obtained from the supervisory authority.</p> <p>If Finavia is processing the data of the data subject the data necessary to respond to the subject access request will be collected from respective Finavia registers in an internal process.</p> <p>The data relating to the supervisory authority's clarification request is partly obtained from the supervisory authority, partly from the controller itself (e.g. the reference number, date of receipt of the request as well as other relevant information pertaining to the request).</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>Data stored in the register shall not be disclosed or transferred outside the European Union or European Economic Area.</p>
<b>10. Data Retention Period</b>	<p>The data contained in the register will be retained for as long as the data controller's statutory obligation to demonstrate is in force under the EU General Data Protection Regulation or other legislation taking into account the official guidelines on the processing and storage of personal data.</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 or from another source mentioned above and will be updated to reflect the information provided by the data subject to the data controller.</p>
<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.</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 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>).</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 in pending the verification whether the legitimate grounds of the</p>

	<p>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 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>16. 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>17. 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>18. 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>19. 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>
<b>20. Revision record</b>	<p><u>Nov 13, 2018</u>: In points 5 and 7, purpose of processing was clarified and the information relating to the communication by the supervisory authority was added.</p> <p><u>Oct 28, 2019</u>: This revision endeavors to clarify the presentation of information and provides information on newly added data fields and other added functionalities.</p> <p>Point 2: Contact person information updated.</p> <p>Point 4: Clarified that the concerned accountability requirement relates to data subjects' rights.</p> <p>Point 5: The purposes of processing have been numbered and linked to their legal bases respectively, purpose of processing no. VII has been clarified [by adding reference to "development of the functionality of the application"].</p> <p>Point 6: The disclosure of data has been clarified. With regard to data transfer, the name of the service provider has been added.</p> <p>Point 7: Clarification of the cases in which data can be stored in the listed data fields. Inclusion in the list of data items: 'date of contact', 'date of reply to a data request' and 'case reference number'. Addition of the storage of communication between the controller and the data subject and the acknowledgment obtained from the data subject. Addition of 'other information obtained from the authority' and removal of reference to 'potential data breach'.</p>

	<p>Point 8: Clarification of the data sources by separately referring to the data generated by the data controller upon receipt of the data request and the data retrieved from other registers in connection with the data search process in order reply to the data subject's request.</p> <p>Point 10: Completion of the statement concerning the entry of information by adding reference also to other sources than the data subject him-/herself.</p> <p>Point 20: Added a new point "Revision record" to indicate the most recent privacy policy changes.</p> <p><u>January 26, 2021:</u></p> <p>Section 4: Reformatted the description of the purpose of the register</p> <p>Section 6: Introduction of the use of an external service provider and data center</p> <p>Section 8: Clarified the diction of the data search resulting from a Subject Access Request</p> <p>Section 12, 15 and 17: Added reference to the Subject Access Request form on Finavia's website.</p> <p><u>February 4, 2022</u></p> <p>Updated information concerning data processors in clause 6.</p> <p><u>March 1, 2022</u></p> <p>The text of clause 5 has been amended as follows:</p> <ul style="list-style-type: none"><li>• We have made a distinction between the main purpose of the personal data processing and the detailed purposes of processing and use of the data with the latter presented as a numbered list.</li><li>• We have particularized the applicable legal bases in relation to various purposes of the data usage.</li></ul> <p>As a result of changes made to the data subject access request process, we have revised clause 7 as required, and complemented certain items in the list of collected personal data types.</p> <p>Reference to official guidelines has been included in clause 10 text as a result of recent developments in them.</p>
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