

PRIVACY POLICY

Date: 22 May, 2018 (revised on 13 Nov 2018, adding the collection of data of the representative of the supervisory authority)

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>Jarmo Lumiaho, Merja Rutanen Street address: Finavia Oyj, Lentäjätie 3, 01531 Vantaa Postal address: P.O. Box 50, FI-01531 VANTAA Phone (PABX): 020 708 000</p>
<p>3. Data Protection Officer</p>	<p>Data Protection Officer of Finavia Oyj email: tietosuojavastaava@finavia.fi Phone: 020 708 2828</p>
<p>4. Register</p>	<p>Register for Controller's Data Protection accountability</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p>This register is maintained and personal data is processed in order for the controller to be able to demonstrate compliance with the European Union's General Data Protection Regulation stipulations.</p> <p>This register will contain:</p> <ul style="list-style-type: none"> • relevant Data Protection documentation (of Finavia), • information about accountable persons (of Finavia), • information about the contact and data requests made associated to data subjects' legitimate rights' exercise. <p>The legal basis for data processing:</p> <ul style="list-style-type: none"> • Processing is necessary for compliance with a legal obligation to which the Controller is subject (demonstration of compliance according to EU 2016/679 article 5) • Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. <p><u>Personal data can be used inter alia:</u></p> <ul style="list-style-type: none"> • For documentation of contact by the data subject or by the supervisory authority and the search of the same • For serving the data requests by data subjects within Finavia Corporation • For contacting the data subjects or for delivering the reply of the controller to the data subject • To demonstrate, as may be necessary, that the data subject is exercising his/her legal rights repeatedly. • For settling disputes associated to data protection. • For improving the liaison process with the data subject.
<p>6. Recipients of Personal Data</p>	<p>Finavia corporation will not disclose personal data stored in this register to third parties, except in case of the supervisory 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 who then receives personal data from their processor.</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.</p> <p>Finavia Corporation will not disclose personal data of this register for commercial purposes.</p>
<p>7. Data Contents of the register</p>	<p>The following personal data may be collected:</p> <ul style="list-style-type: none"> • name • email address • phone number • address • indication that the data subject has been identified • method of identification • When and where identification took place • type of request (which legal right the data subject is exercising) • method of contact • title of contact/request • detailed description of request's nature • desired method of information delivery • status of processing of the request or contact • The description (detailed record of what the data subject has communicated or how he or she wants to exercise his/her rights) <p>The replies to the Data Subject will also be stored and that data may contain Data Subject's personal data collected in other registers.</p> <p>In case of a clarification request by the supervisory authority or in connection with a potential personal data breach, the name and contact data of the authority representative may be stored if required for processing the issue.</p>
<p>8. Data Sources</p>	<p>Data will be collected partially from the data subject and partially from the data controller in connection with the data request process related to the exercise of the rights of the data subject</p>
<p>9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area</p>	<p>Data stored in the register shall not be disclosed or transferred outside the European Union or European Economic Area.</p>
<p>10. Data Retention Period</p>	<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.</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 and will be updated to reflect the information provided by the data subject to the data controller.</p>

<p>11. Data Protection Principles</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>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 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>