

PRIVACY POLICY

Date: 21 May, 2018 (point 5 restructure update on 26 November 2018, point 7 restructure update on 12 March 2019)

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: P.O.Box 50, 01531 Vantaa Phone (PABX): 020 708 000</p>
<p>2. Contact Person(s) for filing system related matters</p>	<p>Name: Sami Wetterstrand Title: System Specialist Street address: Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa Phone: +358 20 708 2987 email: sami.wetterstrand@finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Data Protection Officer of Finavia Oyj email: tietosuojaavastaava@finavia.fi Phone: 020 708 2828</p>
<p>4. Name of register</p>	<p>Finavia video surveillance systems</p>
<p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p>	<p>The airports and other properties of Finavia Corporation are monitored with a video surveillance system which records personal data into the register described in this Privacy Policy.</p> <p>The personal data contained in the register may be used for following purposes:</p> <ol style="list-style-type: none"> 1. For access control, to enable assurance of safety and security of the airport and air travel 2. To ensure employees' legal protection 3. To protect the data and the property of the employer, the employees and the customers 4. For crime prevention and crime investigation 5. For supervision of proper functioning of production processes 6. For prevention and investigation of situations that endanger safety or security, property or the production processes 7. For prevention and investigation of mishaps and accidents 8. To monitor and improve the customer experience 9. For statistical purposes 10. To comply with regulatory obligations 11. To prevent misuse <p>The legal basis for the processing of personal data is:</p> <ol style="list-style-type: none"> a) Processing is necessary for compliance with a legal obligation to which the data controller is subject to (access control at the airports, security control of the passengers and hand luggage). b) Processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party. c) Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law (applies to the

	<p>processing of biometric data for the purpose of uniquely identifying a natural person from video capture, if necessary).</p> <p>Processing of personal data is based on the legal obligation of the airport operator to implement airport security. EC Security Regulation 300/2008 and Commission Implementing Regulation (EU) 2015/1998 require airports to safeguard the airside and security restricted area (SRA) and critical parts of security restricted area (CSRA).</p>
<p>6. Recipients of Personal Data</p>	<p>Personal data collected in the register is released under supervision, only for the purposes specified in this Privacy Policy. When disclosing material, we comply with secure data processing and transfer methods. Each disclosure of material is documented.</p> <p>Data may be disclosed or transferred:</p> <ul style="list-style-type: none"> - To a competent authority in the specific cases regulated by legislation, for example, for the investigation of a crime - To the airline for incident or accident investigation - To the third-party operators in the airport area who are involved in the airport operations as a tool for monitoring their production processes (real-time video stream without recording right) - To the employer's representative (person who represents Finavia as an employer) for legitimate reasons specified in the Act on the Protection of Privacy in Working Life (759/2004) - To the system suppliers for the purposes of testing related to technical development of the system, which cannot be carried out without real footage captured by the cameras <p>The disclosure of data is always based on a justified written and detailed request submitted by the recipient.</p>
<p>7. Data Contents of the register</p>	<p><u>Data collected about persons and vehicles:</u></p> <p>Footage of the persons and vehicles recorded in the register who are located in the video surveillance area at any given time. The controlled area covers the landside under the monitoring responsibilities of the airport, the airside as well as the security restricted area (SRA) and critical parts of the security restricted area (CSRA) and the close proximity of these areas.</p> <p>The register for video surveillance systems is composed of footage recorded by analogue or digital cameras. In addition to the image, the data from the area under video surveillance, date and time of the image of the events are recorded in the register.</p>
<p>8. Data Sources</p>	<p>The data source for the register is Finavia Corporation's video surveillance systems. The data controller shall install surveillance cameras for the purposes of implementation of the register, in the places he or she deems necessary.</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>The data in the register shall not be disclosed or transferred outside the EU or the European Economic Area.</p>

<p>10. Data Retention Period</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>We will take reasonable measures to keep the personal data we possess accurate by deleting unnecessary data and updating out-dated 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>

19. Changes to Privacy Policy	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.
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