

PRIVACY POLICY

Date: May 15, 2019

EU General Data Protection Regulation, articles 13 and 14

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| <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): +358 20 708 000</p> |
| <p>2. Contact Person(s) for filing system related matters</p> | <p>Name: Kari Luhtanen Title: Head of Facility and Lease Management Street address: Lentäjätie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa email: kari.luhtanen@finavia.fi</p> |
| <p>3. Data Protection Officer</p> | <p>Data Protection Officer of Finavia Corporation email: tietosuojavastaava@finavia.fi Phone: +358 20 708 2828</p> |
| <p>4. Name of register</p> | <p>Rental agreements and facility management register of Finavia Corporation</p> |
| <p>5. Purpose of Processing of Personal Data and the Legal Basis for Data Processing</p> | <p><u>The purpose of processing:</u> The purpose of processing personal data in the Rental agreements and facility management system is the storage and maintenance of the customer data of the lessee party to the agreement to allow Finavia Corporation to individualize the necessary data for the rental agreement, fulfil all its legally required obligations, invoice the rent charge according to the rental agreement, to handle rent security deposits, manage its facilities available for rent and to maintain contact with the lessee or its representative.</p> <p><u>Legal basis for data processing:</u></p> <p>a) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract [Finavia Corporation provides the other party to a contract who is a natural person with a rental service];</p> <p>b) processing is necessary for the purposes of the legitimate interests pursued by the controller [the data subject is not a party to the rental agreement with Finavia Corporation but acts as a contact person on behalf of the lessee or the data subject is an account manager of Finavia Corporation].</p> |
| <p>6. Recipients of Personal Data</p> | <p>Data will be transferred to the system provider (CGI Suomi Oy) to enable technical support of the database and troubleshooting malfunctions.</p> <p>Rental invoices are delivered to the customers via Finavia's Financial Management system and an invoice hotel system. The personal data necessary for invoicing will be transferred to the invoice hotel system provider, CGI Suomi Oy.</p> |

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| | <p>Data may have to be disclosed to relevant parties if the rent security deposit must be realised.</p> <p>Finavia does not disclose data for commercial purposes.</p> |
| 7. Data Contents of the register | <p>The data content is divided into three data sets.</p> <p>The Rental agreements and facility management system comprises customer registers for natural persons and enterprise customers. In addition to the rental property, these registers contain data concerning natural persons and legal persons who are facility rental customers of Finavia Corporation.</p> <p>The natural persons' customer register contains the name, social security number, customer number, address, phone number and email address of a natural person.</p> <p>The enterprise customers' register contains the name, business ID, customer number, address, billing address of the enterprise and the name, phone number and email address of the contact person.</p> <p>With regard to rent security deposits management we also process the following data: Customer's name, customer number, arrival date of security, guarantor, type of security, amount of security, validity period of security, customer type, other relevant information (such as number of eventual bank guarantee or rental agreement number); when a security deposit has been paid to Finavia, the sum of money, and the name of Finavia's account manager (if known).</p> |
| 8. Data Sources | <p>Data for the customer registers is collected from the data subject when the lessee is a natural person, or otherwise from the other party to the contract.</p> <p>Data relating to rent security deposits is obtained from the guarantor.</p> |
| 9. Disclosure of Data and Transfer of Data to the Countries Outside of the European Union or the European Economic Area | <p>Data is not transferred or disclosed to countries outside of the European Union or the European Economic area unless it is necessary for example to liquidate a guarantee or to return a paid deposit.</p> |
| 10. Data Retention Period | <p>Finavia Corporation will retain personal data in accordance with the valid rental agreement and legislation 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> |
| 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</p> |

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| | <p>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</p> |

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| | <p>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 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> |