

## PRIVACY POLICY

Date: 4 June 2025

### General Data Protection Regulation (GDPR) of the EU, articles 13 and 14

<b>1. Data Controller</b>	Finavia Corporation Business ID: 2302570-2 Street address: Lentäjätie 3, FI-01530 Vantaa, Finland Postal address: P.O. Box 50, FI-01531 Vantaa, Finland Tel. (exchange): +358 20 708 000
<b>2. Contact person(s) for matters related to processing</b>	Name: Minna Asikainen Title: Product Owner Address: Lentäjätie 3, FI-01530 Vantaa, Finland Telephone: +358 20 708 2907 Email: minna.asikainen(at)finavia.fi
<b>3. Data protection officer</b>	Contact information of the Data Protection Officer of Finavia Corporation: Email: tietosuojaavastaava(at)finavia.fi Tel. +358 20 708 2828
<b>4. Name of the data file or processing activity</b>	Register of subscribers to the MyFlight service and related communications
<b>5. Purpose of the processing of personal data and the legal basis for data processing</b>	<u>Purpose of processing personal data:</u> Providing MyFlight communications, including delivering emails and push notifications to the user. MyFlight communications are targeted at the subscriber on the basis of the information they have entered about their flight. MyFlight communications and newsletters can also be targeted and tailored to the recipient on the basis of the data content in Finavia's customer register. Finavia also monitors the opening and viewing statistics of MyFlight messages for communications development purposes. <u>Legal basis for data processing:</u> The data subject has given consent to the processing of their personal data for the purpose of electronic direct marketing. The development and targeting of communications is based on Finavia's legitimate interest in implementing effective marketing that interests its customers.
<b>6. Recipients of personal data</b>	Personal data is transferred to the following: <ul style="list-style-type: none"> <li>• Amazon Web Services EMEA SARL for the purpose of sending emails through the AWS SES service. Amazon's servers are located within the EU.</li> <li>• Futurice Oy for the purpose of service maintenance and development</li> <li>• Microsoft as part of the operations of Finavia's marketing automation system</li> <li>• Parties outside Finavia that enable the sending of push notifications (push message servers of the administrators of the browser used)</li> </ul> <p>In addition, Finavia Corporation may disclose your personal data to its marketing and media environment partners in order to form customised audiences and improve the targeting of marketing.</p>

<p><b>7. The data to be processed</b></p>	<p>Depending on the selected communication delivery method, the following data is collected from subscribers to MyFlight messages:</p> <p>1) MyFlight communications by email</p> <ul style="list-style-type: none"> <li>• Consent for sending marketing communications</li> <li>• Email address</li> <li>• Information concerning the flight</li> <li>• Flight-related interests selected by the user</li> <li>• Activity data, such as the number of message openings and the number of times the different news items in the message were read, the cancellations of newsletter subscriptions and the successful delivery of newsletters, data concerning the use of Finavia's other services and content (e.g. airport parking data, MyFlight subscription data, website browsing data).</li> </ul> <p>2) MyFlight communications with push notifications</p> <ul style="list-style-type: none"> <li>• Consent for sending marketing communications</li> <li>• Identifying information needed to deliver push notifications</li> <li>• Information concerning the flight</li> </ul> <p>In order to target marketing and other content to the customer, Finavia uses the identifiers of the customer's device in Finavia's app and Internet services and Finavia's and its contractual partners' cookies stored on the device.</p>
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<p><b>8. Data sources</b></p>	<p>The data is collected directly from the data subject through the finavia.fi website.</p> <p>Data related to the implementation, targeting and development of communications can be obtained from the technical information systems used for personal data processing and the monitoring systems used for newsletters as well as from Finavia's customer register.</p> <p>The identifying data required to deliver push notifications is obtained from the user's device.</p>
<p><b>9. Transfer of personal data to countries outside the European Union or the European Economic Area</b></p>	<p>Finavia does not transfer personal data to countries outside the EU and the European Economic Area (EEA).</p> <p>The sending of push notifications requires the use of services provided by the maker of the browser, which means that Finavia has no influence on how this may transfer data outside the EU/EEA.</p>
<p><b>10. Data retention period</b></p>	<p>MyFlight communications are sent:</p> <ul style="list-style-type: none"> <li>• until the flight departs or is cancelled (departing flight); or</li> <li>• until the feedback survey is sent (arriving flight), which takes place after the baggage claim process has ended.</li> </ul> <p>After this period, Finavia Corporation will send the data subject a general newsletter and retain personal data for as long as the data subject remains a subscriber to the newsletter. The data will be permanently deleted after the data subject has cancelled their subscription or withdrawn their consent, unless the data controller is required to retain the data under applicable law. Email addresses that have proven to be invalid are deleted from the AWS SES service every three months.</p>
<p><b>11. Data protection principles</b></p>	<p>The personal data in this register are protected by technical and organisational measures against unauthorised and/or illegal access, alteration and destruction or other processing, including unauthorised disclosure and transfer of the data.</p> <p>The data will be stored in electronic systems protected by firewalls, passwords and other appropriate technical solutions. Access right to the data file is only granted to specific persons employed by Finavia Corporation and other specific persons who need it to carry out their duties. All persons entitled to access the data file are bound by an obligation of 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 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 will have the right to know what data concerning them has been recorded, or that their personal data is not stored in the register. At the same time, the data controller will notify the data subject of the regular data sources of the processing activity and the purpose for which the data is used and the parties to which the data is regularly disclosed. See section <b>18. Contact</b>.</p>

<b>13. Right to data portability</b>	<p>After the data subject has submitted personal data concerning themselves to the data controller in a structured, commonly used and machine-readable format, the data subject will have the right to transfer personal data concerning themselves to another data controller if:</p> <ul style="list-style-type: none"><li>a) the processing is based on the data subject's consent or on a contract between the data controller and the data subject; and</li><li>b) the processing is carried out by automated means; and</li><li>c) the transmission is technologically possible.</li></ul> <p><i>[Not applicable to this processing]</i></p>
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<p><b>14. Consent and withdrawing consent</b></p>	<p>The processing of personal data is based on the data subject's consent to the delivery of personalised marketing communications by electronic messages or notifications. The data subject has the right to withdraw this consent at any time. The consent can be withdrawn as follows:</p> <ul style="list-style-type: none"> <li>• by using the unsubscribe link at the end of each marketing message, which will terminate the delivery of the MyFlight service, the related communications and the newsletter (<i>recommended method</i>); or</li> <li>• if push notifications were selected as the delivery method, on the finavia.fi website on the page for the flight in question or in the browser settings of the device (<i>recommended method</i>); or</li> <li>• according to the procedure described in <b>section 18, Contact</b>, of this Privacy Policy.</li> </ul> <p>However, the withdrawal of consent does not invalidate the legal basis that existed for the processing of personal data that took place before the withdrawal.</p>
<p><b>15. Data rectification and erasure and restriction of the processing of data</b></p>	<p>The data controller must, at the request of the data subject or on their own initiative, without undue delay rectify, delete or supplement personal data in the register if the data is erroneous, unnecessary, incomplete or obsolete for the purpose of the processing. Furthermore, the data controller must prevent such data from being transferred or disclosed, if the data might jeopardise the data subject's privacy or rights.</p> <p>At the data subject's request, the data controller must restrict the processing of data if the data subject has contested the accuracy of their 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 instead requests the restriction of the processing of the data. The data controller must 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 must 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 is waiting for a decision on whether the legitimate grounds of the data controller override those of the data subject. If the data controller has restricted the processing on the aforementioned grounds, the data controller must notify the data subject before the restriction of processing is lifted.</p>
<p><b>16. Right to object</b></p>	<p>The data subject has the right to object, on grounds relating to their particular situation, to the processing of personal data concerning them at any time if the processing is based on a public interest and a legitimate interest (Article 6(1)(e) or (f)). If the data subject objects to the processing of their personal data, the controller may no longer process the personal data, unless the controller can demonstrate that there are compelling legitimate grounds for the processing. Furthermore, the data subject has the right to object at any time to the processing of their personal data for direct marketing purposes, including profiling related to direct marketing.</p>

<b>17. Right to lodge a complaint</b>	The data subject will have the right to lodge a complaint with a supervisory authority if Finavia Corporation has not complied with applicable data protection regulations.
<b>18. Contact</b>	<p>A data subject who wishes to access personal data about themselves in the manner described in section 12 of this Privacy Policy or to use any other right based on law must submit a request to this effect either</p> <ul style="list-style-type: none"> <li>a. by using the Data Subject Access Request form available on the Finavia website (<a href="http://www.finavia.fi/en/data-protection">www.finavia.fi/en/data-protection</a>) (<i>recommended</i>), or</li> <li>b. in a personally signed or otherwise comparably verified document.</li> </ul> <p>The request in writing (alternative b above) must be submitted 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 their identity before processing the request. Finavia may refuse to grant the request on the basis of the provisions of applicable legislation.</p> <p>Finavia Corporation will respond to requests within one (1) month of receiving the request unless there are special reasons to change the response time.</p>

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<b>19. Automated decision-making and profiling</b>	The data collected can be used to profile data subjects to target the content of newsletters, but not for automated decision-making.
<b>20. Changes to the Privacy Policy</b>	Finavia Corporation continuously develops its business operations and, therefore, reserves the right to make changes to this Privacy Policy by providing a notification of the change on its website. The changes to this Privacy Policy may also be based on legislative changes. Finavia Corporation recommends that the data subjects study the content of the Privacy Policy regularly.