

PRIVACY POLICY

Date: 4 June 2025

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

1. Data controller	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
2. Contact person(s) for matters related to the register	Name: Liinu Lohi Title: Communications Specialist Street address: Lentäjätie 3, FI-01530 Vantaa, Finland Postal address: P.O. Box 50, FI-01531 Vantaa, Finland Telephone: +358 20 708 2002 Email: comms@finavia.fi
3. Data Protection Officer	Contact information of the Data Protection Officer of Finavia Corporation: Email: tietosuojavastaava(at)finavia.fi Telephone: +358 20 708 2828
4. Name of data file	Finavia Corporation's newsletter subscriber register (Finavia newsletter and Helsinki Airport Newsletter)
5. Purpose of the processing of personal data and the legal basis for data processing	The purpose of processing personal data in the register is to store and maintain information of the subscribers to the Finavia Corporation's newsletters so that Finavia is able to send the newsletter to the subscribers. Finavia also monitors newsletter opening and viewing statistics for communications development purposes. The content of the newsletter can also be targeted and tailored to the recipient on the basis of the data content in Finavia's customer database. The legal basis for the processing of personal data for the purpose of direct marketing is the consent given by the data subject. The development and targeting of communications is based on Finavia's legitimate interest in implementing effective marketing that interests its customers.
6. Recipients of personal data	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.
7. The data to be processed	The register contains information for subscribing to the newsletter including: <u>Subscriber information:</u> First name, last name and email address of the subscriber, the company or organisation they represent, the name of the newsletter subscribed to and the date on which the subscription data has last been updated. <u>Information related to the implementation, targeting and development of communications:</u> Activity data, such as the number of newsletter openings and the number of times the different news items in the newsletter were read, as well as 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), interests expressed by you. 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.
8. Data sources	Data concerning the subscriber to the newsletter is primarily obtained from the data subject. Data related to the implementation, targeting and development of communications is obtained from the technical information systems used for data processing and the monitoring systems used for newsletters as well as from Finavia's customer register.
9. Transfer of personal data to countries outside the European Union or the European Economic Area	The data is not transferred outside the European Economic Area (EEA).
10. Data retention period	Finavia Corporation retains personal data for as long as each 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.
11. Data protection principles	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. 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. 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.
12. Right of access and its implementation	After stating the information required to find the data, a data subject has the right to know which information about them is stored in this register, or the fact that the register contains no information about them. At the same time, the controller reports to the data subject the regular data sources of the register and the purpose for which the data in the register is used and the parties to which the data is regularly disclosed. See section 18. Contact.
13. Right to data portability	Once the data subject has delivered to Finavia their personal data in a structured, commonly used and machine-readable format, the data subject shall have the right to have that data transmitted to another controller if:

	a) the processing is based on the data subject's consent or on a contract between the data controller and the data subject; and b) the processing is carried out by automated means; and c) the transmission is technologically possible. Not applicable for this processing.
14. Right to withdraw consent	The data subject has the right to withdraw their consent and cancel their subscription to the newsletter at any time, either by using the unsubscribe link in the newsletter or by submitting a personally signed request or otherwise comparably verified document that must be submitted by email to the person named in section 2 of this Privacy Policy. 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.

15. Rectifying and deleting of data and restriction of its processing	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. 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.
16. Right to object	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.
17. Right to lodge a complaint	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.
18. Contact	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 a. by using the Data Subject Access Request form available on the Finavia website www.finavia.fi/en/data-protection (recommended), or b. in a personally signed or otherwise comparably verified document. The request in writing (alternative b above) must be submitted to the contact person indicated in section 2 of this Privacy Policy.

	Finavia Corporation may request the newsletter subscriber to specify the request and verify their identity before processing the request. Finavia Corporation may refuse to grant the request on the basis of the provisions of applicable legislation. Finavia Corporation will respond to requests within one (1) month of receiving the request unless there are special reasons to change the response time.
19. Automated decision-making and profiling	The data collected can be used to profile data subjects to target the content of newsletters, but not for automated decision-making.
20. Changes to the Privacy Policy	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 newsletter subscribers study the content of the Privacy Policy on a regular basis.