

## **PRIVACY POLICY**

Updated: 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: Lentäjäntie 3, FI-01530 Vantaa, Finland Postal address: P.O. Box 50, FI-01531 Vantaa, Finland Tel. (exchange): +358 20 708 000
2.	Contact persons for matters related to the register	Name: Niko Ropa Title: Landside Traffic Manager Street address: Lentäjäntie 3, FI-01530 Vantaa, Finland Postal address: P.O. Box 50, FI-01531 Vantaa, Finland Telephone: +358 20 708 3230 Email: niko.ropa(at)finavia.fi
3.	Data Protection Officer	Contact information of the Data Protection Officer of Finavia Corporation: Email: tietosuojavastaava@finavia.fi Telephone: +358 20 708 2828
4.	Name of data file	Helsinki Airport vehicle parking register
5.	Purpose of the processing of personal data and the legal basis for data processing	The purpose of the processing of personal data in the register is to manage the parking of Finavia Corporation's customers in Helsinki Airport's parking areas, provide parking guidance, maintain customer relationships, communicate with customers, carry out invoicing, prevent and investigate misuse and protect Finavia's property.
		In addition, the data may be used for parking area monitoring (e.g. to investigate damage and incidents), statistics, data analyses or customer surveys, e.g. to develop services and improve business efficiency, as well as for direct marketing to customers who have consented to this. Finavia may also process personal data to develop, target and tailor its newsletters, other communications and marketing activities.
		The legal basis for the processing of personal data with regard to parking management, customer relationship maintenance and parking guidance is the fulfilment of a contract to which the data subject is a party or the implementation of pre-contractual measures. The contract may concern:  • one-off parking;  • a longer-term parking permit charged to a company¹; or
		<ul> <li>parking that is charged by a third party to a customer registered as a user of a mobile app.</li> <li>The legal basis for the processing of personal data for the purposes</li> </ul>
		of protecting Finavia's property (e.g. camera surveillance of the parking area), preventing and investigating misuse, compiling sta-

<sup>&</sup>lt;sup>1</sup>Parking permits can be linked to an ID card or a vehicle registration number.



tistics, invoicing contract parking, data analysis, targeting marketing communications and using the data for customer surveys is the legitimate interests of the data controller or a third party. With regard to sending direct marketing, the legal basis is the consent given by the data for the processing of personal data for one or more specific purposes. Finavia Corporation's legitimate interests related to the conduct of business include the following: the need to monitor order and Finavia's property in parking areas to ensure safety the ability to carry out invoicing for the services provided to its client the opportunity to develop Finavia's services and operations 6. Recipients of personal data Finavia only regularly transfers the personal data it collects for the purposes described in this Privacy Policy. The data is also processed by external system and service providers in relation to, for example, parking management and parking guidance, Finavia's marketing, customer surveys, data analyses and other purposes described above to the extent required by the processing purpose in question. 7. Data content of the data file The following personal data is processed in the register: For each parking transaction: The parking management system reads the vehicle registration number at the barrier, which identifies and links the vehicle to the starting/ending parking transaction, or the registration number is used to identify an existing parking permit and control the barriers. In parking buildings with the FLS Portier Find My Car parking guidance system, the vehicle's registration number is also read when it enters a parking space and the time stamp and identifying data of the space are collected. This information is used to locate the parked vehicle in the building. One-off parking: For parking that is pre-booked via the Finavia website, the information required for the implementation of the booking is also stored in this register: The booked parking area, the start and end times of the booking, and the registration number of the vehicle, if any, provided by the customer when they booked the parking. Parking transaction details: The parking area, the actual start and end times of parking, the fee determined on the basis of these and information on whether it has been paid. The email address entered by the customer at the parking payment machine for the delivery of the receipt by email. Pre-booking data can also be used in the development and tailoring of Finavia's operations, services and marketing, and this data can be combined with other customer data held by Finavia. Long-term parking permit (in the customer information system): Contact details of the parking permit holder and the information of the parking permit orderer/company as well as the



### parking permit

(P areas and information regarding the validity of the permit).

• The registration number of the vehicle, if specified when ordering the parking permit or later.

### Moovy corporate contract customers:

- The name and contact details of the company's contact person and any marketing consent.
- The contact details of the person using the corporate contract and any marketing consent, as well as the vehicle registration number when using the parking permit.

### Monitoring of the parking area:

In the P1 and P2 halls, the parking guidance system briefly records events in the vicinity of parking spaces. The recording shows vehicles and possibly also people in their vicinity, if there are people in the recording area at the time when the recording is started by motion sensors.

#### 8. Data sources.

### One-off parking:

- The booking identifier data for pre-booked parking is obtained from the customer making the booking via the Finavia website.
- The identifying data for the parking transaction is obtained from the recognition systems at the parking area's entrances and exits\*.
- The price information for one-off parking is determined automatically on the basis of the aforementioned information.
- \* Regardless of the nature of the parking transaction (one-off payment, parking permit/contract parking), the read vehicle registration number is collected by the parking management system from the recognition systems during entry and exit.

## Long-term parking permit (customer information system):

- Data concerning the customer and the parking permit is collected in the customer information system from the parking permit order form, which the customer or the company's representative fills in when ordering the parking permit.
- The orderer or holder of the parking permit may also provide the vehicle registration number to be linked with the parking permit.

## Moovy corporate contract customers:

 Data concerning the Moovy corporate contract parking permits that companies distribute to their employees and any consents for direct marketing are obtained from the companies' contact persons and the recipients of parking permits.

## FLS Portier in parking buildings with a parking guidance system:

Vehicle locating data for the parking guidance system (including vehicle registration number, time stamp and parking space identifier) is obtained from the parking guidance system's cameras located near the parking space, which also provide surveillance images. The initial data required to locate the parked vehicle is obtained from the customer.

Statistics and data analyses are based on the data obtained in the aforementioned manner.



9. Disclosure and transfer of data to countries outside the European Un-	Finavia does not usually disclose data outside the EU or the European Economic Area.
ion or the European Economic Area	If it is necessary to transfer data to countries outside the European Economic Area, the disclosure or transfer is protected using the European Commission's Standard Contractual Clauses if the recipient is located in a state whose data protection is not recognised as adequate by the EU, and additional measures are taken to ensure data protection, if necessary.
10. Data retention period	Finavia Corporation will retain the personal data in accordance with current legislation and only for as long as is necessary in order to fulfil the purposes specified in this Privacy Policy.
	Personal data older than 12 calendar months is deleted from the parking management systems on a monthly basis.
	Active personal data related to parking permits, parking bookings and completed parking transactions are retained in customer information systems for as long as necessary to fulfil the purposes specified in this Privacy Policy. Outdated personal data is deleted from customer information systems at least once a year.
	The vehicle-specific personal data in the parking guidance system is deleted within two days of the end of the parking of the vehicle.
	The data may need to be retained for a longer time than the aforementioned periods due to obligations arising from applicable legislation.
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	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:  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.
14. Right to withdraw consent	If the processing of personal data is based on consent given by the data subject, the data subject has the right to withdraw his or her consent at any time. The request to withdraw consent must be submitted as a personally signed or otherwise comparably verified document to the contact person stated in section 2 of this Privacy Policy. However, the withdrawal of consent does not invalidate the legal grounds 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.
	Rectification requests must be submitted to the contact person specified in section 2 of this Privacy Policy or by using the information request form on Finavia's website ( <a href="https://www.fina-via.fi/en/data-protection">https://www.fina-via.fi/en/data-protection</a> ).



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 ( <a href="www.finavia.fi/en/data-protection">www.finavia.fi/en/data-protection</a> ) (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 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.  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 for profiling data subjects to target information and services, 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 the data subjects study the content of the Privacy Policy regularly.