FINAVIA
for smooth travelling

PRIVACY POLICY

Date: 19 November, 2026 (for update summary, see section 19)

EU General Data Protection Regulation, articles 13 and 14

1. Data controller	Finavia Corporation Business ID: 2302570-2 Street address: Lentäjäntie 3, 01530 Vantaa Postal address: P. O. Box 50, 01531 Vantaa Phone (PABX): +358 20 708 000
2. Data Protection Officer	Contact information of the Data Protection Officer of Finavia Corporation Email: tietosuojavastaava(at)finavia.fi
3. Name of Register	Register related to the assistance system for passengers with disabilities and reduced mobility system (PRM register)
4. Purpose of Processing of Personal Data and the Legal Basis for Data Processing	Processing of personal data is necessary for enabling assistance to passengers with disabilities and reduced mobility. The purpose of processing is to conduct the coordination of service to passengers requiring PRM assistance. Legal basis for data processing: 1. processing is necessary for compliance with a legal obligation to which the controller is subject [EU GDPR Article 6; Data Protection Act 6§]] (to organize the PRM service). 2. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (service development) The rights of persons with disabilities and reduced mobility is regulated by the European Union regulation EC 1107/2006 according to which airports are responsible for ensuring the provision of assistance to the PRM for travel by air. Air carriers, their agents and tour operators are obliged to notify airports concerning the passenger's need for assistance. This information is transmitted to the PRM system. Airports may provide the assistance to disabled persons and persons with reduced mobility themselves or may contract with third Processing of personal data is necessary for enabling assistance to parties for the supply of this assistance.
5. Recipients of Personal Data	Third parties provide the PRM service and process personal data stored in the system when coordinating the daily service for the assisted passengers at the airport. The supplier of the PRM system (Av-Tech Inc.) has access to personal data in connection with maintenance service and to enable system development. Personal data of the passengers or employees may be disclosed to Finnish Transport and Communication Agency Traficom (national supervisory body), in connection with their enforcement duty, or to Finavia customer feedback service for further investigation of the customer feedback.

6. Processed Data Contents	The data contents regarding the passengers: Name of the passenger, flight number and special assistance code. The special assistance code contains sensitive data concerning health. The data contents regarding the PRM assistance personnel: The system stores employee name data and ID card number. An employee can voluntarily supply his or her email address.
7. Data Sources	The data of the passengers are transmitted from the air carriers', its agents' or tour operators' systems to the PRM system when a notification of the need for assistance has been received in advance. Passengers' personal data can also be entered into the system manually when a notification is received later than 48 hours prior to the departure of the flight. Passenger's personal data can also be entered into the system by scanning the data of the passenger's boarding pass. The personal data of the PRM assistance personnel are collected from themselves or from their employer.
8. Transfer of Personal Data to Countries Outside of the European Union or the European Economic Area	Personal data is transferred to an outsourced service provider in the United Kingdom. The transfer is based on the adequacy decision by the EU Commission.
9. Data Retention Period	The passengers name data, the assistance code and flight number are retained for 12 months after completion of the assistance. Employee name data and email address will be erased one year after the expiry of his or her previous system access right. The data retention period is based on a Finavia Corporation policy. Personal data may be required afterwards for customer feedback investigation or for response to competent authorities' requests.
10. Data Protection Principles	Personal data 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. 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 data. Anyone having access to the data shall be bound by the professional 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
11. Right of Access and its Implementation	After having supplied sufficient search criteria, the data subject shall have the right to know what data concerning to him/her has been recorded, or that his/her personal data is not processed. At the same time, the data controller shall provide the data subject with information about the regular sources of data, the use of data, and the regular destinations of disclosed data. Refer to section **16. Communications** for detailed instructions.

12. Right to Data Portability	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; a) The data processing is based on the data subject's consent or a contract between the data controller and the data subject, and; b) The processing is carried out by automated means, and; b) If the transmission is technically possible.
13. Right to Withdraw Consent	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 by email using the contact details provided 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.
14. Rectification, Deletion and Restriction of Processing of Data	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 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. 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 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.
15. Right to Lodge a Complaint	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.
16. Communications	The data subject, who wishes to inspect personal data concerning him/her in the manner described in section 11 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 https://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 Data Protection Officer using the contact details provided in section 2 of this Privacy Policy. 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. 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.

17. Automated Decision-Making and Profiling	The data shall not be used for automated decision-making or profiling the data subjects.
18. Changes to the 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 or in another appropriate way. The changes to the Privacy Policy may also be based on the legislative
19. Summary of update changes	<u>Policy update 25 August, 2021:</u> • The Legal Basis for Processing is clarified in section 4. • Sections 4 and 6 clarified by removing unnecessary reference to the entirely separate customer feedback process. • Even if the passengers are advised of the possibility to provide feedback no such data is collected/stored in this register. • Any customer feedback will be processed in the Customer Service System of Finavia and a separate Privacy Policy published on Finavia's web site details the associated personal data processing. • In section 7, clarification of the source of personal data regarding the PRM service personnel. <u>Policy update 17 February, 2023:</u> • The Privacy Policy has been updated with respect to the ways the data subjects can contact Finavia to use their legal rights (sections 11, 14 and 16) • In section 5, the last sentence has been rephrased and particularized with regard to the supervisory role of the Finnish Transport and Communication Agency. • Section 8 has been updated due to Great Britain having departed European Union. • In the first paragraph of section 9, description regarding the retention of data in the event of a customer complaint has been removed (feedback and complaints from customers receiving this assistance service are processed in Finavia's Customer Service Register where the applicable data retention period is determined as described in the Privacy Policy applicable to that register). • The applicability to this processing of the data subject rights presented in sections 12 and 13 has been clarified. Information on Privacy Policy change notification has been supplemented in section 18. <u>Policy update 19 November, 2026:</u> • Contact information update