

## **PRIVACY POLICY**

**Updated:** 4 June 2025

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

Data Controller      Contact persons for matters related to the register	Finavia Corporation ("Finavia") 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  Name: Minna Asikainen Title: Service Manager Address: Lentäjäntie 3, FI-01530 Vantaa, Finland Telephone: +358 20 708 2907 Email: minna.asikainen(at)finavia.fi
3. Data Protection Officer	Contact information of the Data Protection Officer of Finavia Corporation:  Email: Tietosuojavastaava(at)finavia.fi
4. Name of processing activity/register	Finavia Corporation's online services customer register
5. Purpose of the processing of personal data and the legal basis for data processing	Personal data is processed for the following purposes related to Finavia's own services and the services provided by Finavia's partners via Finavia's online services (Services):  • protection against harmful activities targeted at maintenance, development and services  • advertising on Finavia's website, electronic and other direct marketing as well as opinion and market research  • monitoring and improvement of the customer experience  • sales, verification of customer transactions, customer service, customer relationship management and development and communications  • developing, tailoring, monitoring and analysing Finavia's communications and direct marketing  • delivering, processing and archiving orders  • to manage trade receivables and, if necessary, to enable refunds  • analysis, statistics and profiling of customers and the use of services related to the aforementioned purposes  Services include, for example, airport parking services and the related additional services as well as airport lounges.  Legal basis for data processing:  • The fulfilment of a contract to which the data subject is a party.  • The fulfilment of a contract whose pre-contractual measures are taken at the request of the data subject (e.g. order/contract on services offered by Finavia to its customers).  • The data subject has consented to the processing of their personal data for one or more specific purposes (direct market-



	The legitimate interests of the data controller or a third party (statistics and services-related analyses, profiling, management of trade receivables and refunds, development and targeting of Finavia's communications).
6. Recipients of personal data	Finavia may transfer or disclose customer data to its partners whose services the customer uses through Finavia's online services. In addition, Finavia may transfer personal data to its own service providers that process personal data on behalf of Finavia.  These service providers enable, among other things, the processing of purchase information for pre-booked services, messaging, marketing or customer surveys as well as the maintenance and development of Finavia's digital services.
	In addition, when Finavia and an airline have an agreement on taking the purchase of parking into account in the airline's frequent-flyer programme, and if the customer provides their frequent-flyer number when pre-booking parking, Finavia may disclose the necessary information about the purchase to the airline so that the purchase can be recorded in the customer's balance in the frequent-flyer programme.
	Anonymous customer data may be transferred to Google Analytics, for example, for service development purposes.
	In addition, Finavia Corporation may transfer your personal data to its marketing and media environment partners in order to form customised audiences and target marketing more efficiently.
7. The data to be processed	<ul> <li>The following data can be collected for the data file:</li> <li>customer contact and other basic information, such as name, email addresses, phone numbers and other information provided by the customer</li> <li>Information related to the installation, deployment, management and monitoring of Finavia's online services, e.g. registration information, such as username, password and any other unique identifier, and the device's IP address, identifiers, brand, model, manufacturer and operating system</li> <li>information required for the specific service, e.g. vehicle registration number, any parking promo code, etc.</li> <li>customer relationship information, such as invoicing and payment information, product and order information, customer feedback and contacts, and cancellation information</li> <li>information related to the implementation of communications</li> <li>data concerning the use of Finavia's online and other services and content, such as browsing and search data and the user profile data based on them</li> <li>data required to protect against bots¹</li> <li>any information about the customer's interests provided by the customer themselves</li> <li>any permissions and consents given by the customer and direct marketing prohibitions</li> </ul>

<sup>&</sup>lt;sup>1</sup> The Google reCAPTCHA service is used to protect several services in Finavia's network from the harmful effects of bots, with the aim of allowing people to use these services, but preventing bots from misusing them.



	data collected on the basis of the customer's Service-specific
	or general consent
	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	The customer register stores the data provided by the customer, which is necessary for voluntary registration or the booking and provision of a specific service. Data can also be obtained from Finavia's other information systems. Finavia collects data on the use of the Services, the Finavia website and other service channels through the aforementioned systems, the analytics services of Finavia and its contractual partners, and the cookies, device IDs or other corresponding technologies used in them.
	Information can also be obtained from the direct marketing prohibition register maintained by Asiakkuusmarkkinointiliitto (Robinson list) and from the contact information registers and other public registers of the Population Information System, Posti and other parties.
	We obtain data required for the management of trade receivables from the Helsinki Airport's parking pre-booking service from our payment service provider Checkout Finland Oy.
9. Transfer of personal data to countries outside the European Union or the European Economic Area	<ul> <li>The data can also be transferred to countries outside the EU or the European Economic Area for the aforementioned purposes in accordance with current legislation. When transferring personal data to third countries, we implement appropriate safeguards that are based on:</li> <li>the adequacy decision by the European Commission;</li> <li>data transfer contracts in accordance with the EU's Standard Contractual Clauses with data importers; or</li> </ul>
	other grounds for transfer permitted by law.
	The transfer of personal data to Google in the USA to prevent the misuse of online services is protected in accordance with the Standard Contractual Clauses drawn up by the European Commission, and by using the EU-US Data Privacy Framework adequacy decision by the European Commission as the grounds for the transfer.
	For the purpose of developing Finavia's services, anonymised data related to online visits is also transferred to the Google Analytics service.
10. Data retention period	Finavia 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. The data may need to be retained for a longer time than the aforementioned period due to obligations arising from applicable legislation.
	We will aim to maintain the accuracy of any personal data in our possession through reasonable means by erasing unnecessary data and updating outdated data. The data will be entered in the data file in the same form as provided by the data subject or another source and updated according to the data subject's notifications to the controller.



11. Data protection principles	Personal data will be protected by technical and organisational measures against unjustified and/or unlawful access, modification 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. 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 who has access to the data will be bound by a secrecy obligation.
	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.
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 re-
	quest and verify their identity before processing the request. Fin avia 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

## ■ FINAVIA MATERIAL



changes. Finavia Corporation recommends that the data subjects
study the content of the Privacy Policy regularly.