

PRIVACY POLICY

Date: 1 July 2024

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

<p>1. Data Controller</p>	<p>Finavia Corporation ("Finavia") Business ID: 2302570-2 Street address: Lentäjätie 3, FI-01530 Vantaa, Finland Postal address: P.O. Box 50, FI-01531 Vantaa, Finland</p>
<p>2. Contact person(s) for matters related to processing</p>	<p>Name: Ari Kumara Title: Vice President Street address: Lentäjätie 3, 01530 Postal address: P.O. Box 50, FI-01531 Vantaa, Finland Telephone: +358 20 708 2030 Email: ari.kumara(at)finavia.fi</p>
<p>3. Data Protection Officer</p>	<p>Contact information of the Data Protection Officer of Finavia Corporation: Email: tietosuojavastaava@finavia.fi</p>
<p>4. Name of processing activity/register</p>	<p>Register of users of Finavia Corporation's Tolotrack access control system.</p>
<p>5. Purpose of the processing of personal data and the legal basis for data processing</p>	<p><u>Purpose of processing personal data:</u> Maintains the access control system offered by Finavia Corporation (Tolotrack), which is used to implement the independent access of general aviators to areas reserved for general aviators. Users registered in the system are identified by their phone number and name.</p> <p>Personal data is used for the following purposes:</p> <ul style="list-style-type: none"> - To identify users who have requested registration and to create a username - For access control to ensure the safety and security of the airport and air travel - To fulfil regulatory obligations - To prevent misuse <p><u>Legal basis for data processing:</u></p> <ul style="list-style-type: none"> a) The performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (e.g. order/agreement on services offered by Finavia to its customers). b) The processing is necessary to comply with the controller's legal obligation. The processing is necessary to comply with the controller's legal obligation (Aviation Act, EU 2008/300, EU 2015/1998).
<p>6. Recipients of personal data</p>	<p>Finavia uses an external service provider to whom the data in the register is transferred for the storage of the data in the register and for the technical maintenance and development of the information system.</p> <p>The personal data collected in the register will only be disclosed in a supervised way for the purposes specified in this Privacy Policy. Secure methods of processing and transferring data will be followed when disclosing materials.</p>

	<p>Data may be disclosed to:</p> <ul style="list-style-type: none"> - competent authorities in cases specifically stated in legislation, for example to investigate a crime. <p>The disclosure of data will always be based on a justified, written, specific request from the recipient.</p> <p>The information collected in the data file will not be disclosed for commercial purposes.</p>
<p>7. The data to be processed</p>	<p>Information about persons who have a justified need to access routes controlled by Tolotrack will be stored in the register. These groups include Finavia’s own personnel, general aviators, flight club members, parachuting club members, authorities and aviation students.</p> <p>The following personal data will be collected in the register:</p> <ul style="list-style-type: none"> – Last name and first name – Phone number – Represented party/organisation/Pilot licence number or the number of another equivalent document entitling the person to access rights. – Airports for which access rights have been granted – Start and end dates of the access rights <p>The date of birth and email address entered in the registration form on the Finavia.fi website will not be stored in the register, but they may be used when checking the information of the person applying for access rights. The information requested as an attachment to the form will not be saved, with the exception of the commitment form.</p> <p>Information registered about access: The access control register consists of gate and door opening data, access data and the date and time of events.</p>
<p>8. Data sources</p>	<p>Data about the data subject is collected from the application filled in by the data subject themselves on Finavia Corporation’s website.</p> <p>Data on the use of the data subject's access rights is collected from the access control system.</p>
<p>9. Transfer of personal data to countries outside the European Union or the European Economic Area</p>	<p>The data in the register will not be disclosed or transferred to countries outside the EU or the European Economic Area.</p>
<p>10. Data retention period</p>	<p>Access data will be retained for one (1) year, after which it will be automatically deleted from the system.</p> <p>Finavia Corporation will store the personal data in accordance with valid 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 stored for a longer time than the aforementioned period due to obligations arising from applicable legislation.</p> <p>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</p>

	file in the same form as provided by the data subject and updated according to the data subject's notifications to the controller.
11. Data protection principles	<p>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.</p> <p>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.</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>
12. Right of access and its implementation	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 17. Contact .
13. Right to data portability	<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"> 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 c) the transfer is technologically possible.
14. Right to withdraw consent	The processing of personal data is based on consent given by the data subject, which means that the data subject has the right to withdraw their consent at any time. 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. Data rectification and erasure and restriction of the processing of data	<p>The data controller must, without undue delay, on its own initiative or at the request of the data subject, rectify, erase or supplement personal data that is inaccurate, unnecessary, incomplete or outdated for the purposes of processing. The data controller must also prevent the dissemination of such data if the data could compromise 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</p>

	<p>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>
16. Right to lodge a complaint	<p>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.</p>
17. Contact	<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> <ol style="list-style-type: none"> 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. <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 Corporation 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>
18. Automated decision-making and profiling	<p>The data will not be used for automated decision-making or profiling the data subjects.</p>
19. Changes to the Privacy Policy	<p>Finavia Corporation is continuously developing its business and therefore reserves the right to make changes to this Privacy Policy by posting a notification of changes on its website or in another appropriate way. The changes to this Privacy Policy may also be based on legislative changes. Finavia Corporation recommends that the data subjects check the contents of the Privacy Policy on a regular basis.</p>
20. Updates of the Policy	<ul style="list-style-type: none"> • 1 July 2024 Updated the purposes for processing personal data and the legal basis for processing.