

PRIVACY POLICY

Date: 22.01.2025

EU General Data Protection Regulation, articles 13 and 14

1.	Data controller	Finavia Corporation (hereinafter also "Finavia") 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.	Contact Person(s) for processing re- lated matters	Name: Niko Ropa Title: Landside Traffic Manager Street address: Lentäjäntie 3, 01530 Vantaa Postal address: P.O. Box 50, 01531 Vantaa Phone: +358 20 708 3230 Email: niko.ropa(at)finavia.fi
3.	Data Protection Officer	Contact information of the Data Protection Officer of Finavia Cor- poration Email: tietosuojavastaava(at)finavia.fi
4.	Name of Processing Activity/Regis- ter	A traffic management system based on license plate recognition at Helsinki-Vantaa Airport.
5.	Purpose of Processing of Personal Data and the Legal Basis for Data Processing	The purpose of processing:The purpose of processing is to recognize the license plates of vehicles driving to the front of the terminal and measure the duration of their stop at the drop-off ramp. This enables charging a parking fee in the event the allotted free drop-off time is exceeded.Legal basis for data processing:The legitimate interest of the data controller to ensure compliance with the time limits set for free parking and, if necessary, to charge
6.	Recipients of Personal Data	for parking that exceeds the permitted time. Finavia regularly discloses the personal data it collects only for the purposes set out in this Privacy Policy. The data is also processed by external service providers.
		To enable license plate recognition, data is transferred to and stored in a traffic management system maintained by Finnpark Oy on behalf of Finavia. Payment of possible parking fees accumulated from the use of the drop-off zone can be made through the Moovy online platform fol- lowing the instructions at www.finavia.fi/maksu. Data of payment transactions and other data provided to the Moovy platform are processed by Finnpark Oy as an independent data controller in ac- cordance with its own terms of service and privacy policy.
		For the collection of unpaid fees, data is transferred to Riverty Fin- land Oy which processes the data as an independent data control- ler in accordance with its own terms of service and privacy policy.



	Data from the traffic management system may be disclosed to au-
	thorities in cases stipulated by law, such as for the purpose of in- vestigating a crime.
7. Processed Data Contents	The traffic management system stores images of vehicle license plates, the parking area, and the actual start and end times of parking.
	In connection with the license plate image, still images may also capture personal data of individuals in the vehicle if they are visible in the picture. The cameras are directed towards the license plate, but due to size differences between vehicles, some images may also include the interior of the vehicle's front. The vehicle's wind- shield may also display, for example, a permit for disability parking, which may be captured in the still image.
	Finavia does not request vehicle owner information from authori- ties.
8. Data Sources	The data is collected from the data subject itself.
	Additionally, data is collected from the data subject's vehicle. The data subject may also be someone other than the driver/owner of the vehicle if their personal data is captured in the still image.
9. Transfer of Personal Data to the Countries Outside of the European Union or the European Economic Area	The data is not transferred outside the EU or EEA.
10. Data Retention Period	Finavia retains the data in the traffic management system for 96 hours, after which anonymous parking statistics can be processed.
	Finnpark Oy retains the data transferred for billing purposes in ac- cordance with its own privacy policy.
	Riverty Finland Oy retains the data transferred for debt collection purposes in accordance with its own privacy policy.
11. 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 desig- nated persons employed by Finavia Corporation and other desig- nated 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 require- ments 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 Implementa- tion	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 sec- tion 17. Communications for detailed instructions.
13. Right to Data Portability	Not applicable to this processing.
14. Right to Withdraw Consent	The processing of personal data is not based on consent.
15. Rectification, Deletion and Re- striction 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 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.
16. 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.
17. Communications	The data subject, who wishes to inspect personal data concerning him/her in the manner described in section 12 of this Privacy Policy or to use any other right based on law, may submit a request to this effect by using the Data Subject Access Request form available on the Finavia website <u>https://www.finavia.fi/en/data-protection.</u>
	Finavia Corporation may request the data subject to specify the re- quest 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.
18. Automated Decision-Making and Profiling	The data shall not be used for automated decision-making or pro- filing the data subjects.
19. 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 changes. Finavia Corporation recommends that the data
subjects check the contents of the Privacy Policy on a regular basis.