



PRIVACY STATEMENT; Drone flight notifications in the vicinity of the airport,
date: 23 May 2018

General Data Protection Regulation of the EU, Articles 13 and 14

1. Controller

Fintraffic ANS Ltd

Business ID: 2767840-1

Street address: Lentäjätie 1, door B, FI-01530 Vantaa, Finland

Postal address: P.O. Box 157, FI-01531 Vantaa, Finland

Telephone (exchange): +358 (0)20 4284 000

ans@fintraffic.fi

2. Contact person(s) in matters related to the data file

Kari Kerke

Director

kari.kerke@fintraffic.fi

3. Name of data file

Flight plan data file of Fintraffic ANS Ltd; Drone flights in the vicinity of a flight zone

4. Purpose of processing personal data and legal basis for processing

The purpose of processing personal data is to process the drone flight notifications in order to assess the risk or harm caused by the activity to air traffic and the impact on the fluency of air traffic.

Personal data may be used for the following purposes:

- Preventing misuse
- conducting air traffic services
- distributing necessary data

5. Recipients of personal information

Information is distributed to the staff of the air traffic service unit related to the flying activity in order to coordinate the flight and protect air traffic from the drone activity. The data can be disclosed to the authorities in cases where the activity is suspected to have caused an occurrence or incident.

The data is stored in the cloud based service provided by Enfo Oy.

6. Information content of data file

The information is specified in the template on Fintraffic ANS webpage.

- Contact information of the drone pilot
- Description of the activity
- Planned dates and times of activity
- Other information provided by the pilot

7. Sources of information

The information on the pilot is submitted by the author of the flight notification via e-mail or over the phone when receiving information on the flight.

8. Data disclosure and transfer to countries outside the EU or the EEA

Unless otherwise stipulated by other legislation, the records may only be used in the investigation of accidents, occurrences and incidents as well as in the aviation safety work of the air navigation service provider. In addition, the record of the traffic situation may be used to assess environmental impacts and planning of the airspace.

In addition to the stipulations of EU legislation, any person exercising aviation operations, their employees and individuals performing a task impacting aviation safety must report to the Finnish Transport Safety Agency any hazardous situations, interruptions to the operations or other exceptional situations related to the functions of the aircraft, the operations of the flight zone and the air navigation services that endanger or, if no action is taken, would endanger the safety of an aircraft, its passengers or any other person.

9. Storage period of the data

Flight notifications will be stored for six (6) months. At the request of an authority, the data may be stored for a period longer than stated above.

10. Principles of protecting the information

The personal information in this data file is protected through technical and organisational measures against unfounded and/or illegal access, editing and erasure or other processing, including unauthorised disclosure and transfer of the data in this data file.

The data is stored in electronic systems protected with firewalls, passwords and other appropriate technical solutions. Only the designated employees of

Fintraffic ANS Ltd. and other specified individuals who need the data in their duties have access rights to the data file. Anyone with access to the data in the data file is bound by professional secrecy.

Fintraffic ANS Ltd complies with strict data security requirements in the access control and monitoring of its IT systems. Employees who process the data stored in this data file as part of their work tasks are regularly trained and instructed on matters related to data protection and data security.

11. Right of access and its implementation and the right to data portability

After reporting the information required to find the data, the data subject has the right to know which data concerning him/her has been stored in this data file or if there is no data concerning him/her in this data file. At the same time, the controller will report the regular data sources of the file to the data subject, the purposes of the data in the file and the regular recipients of disclosed data.

Any data subject who wishes to access the data concerning him/her as described above must present a request to the contact person stated in section 2 of this privacy statement with a document signed in his/her own hand or similarly authenticated.

The data subject has the right to access any personal data concerning him/her that he/she has delivered to the controller in an itemised, generally accessible and machine-readable format and the right to transfer the data in question to another controller if the processing is based on consent or on an agreement between the controller and the data subject and the processing is performed automatically if the transfer is technologically possible.

12. Right to withdraw consent

If the processing of personal data is based on consent given by the data subject, the data subject shall have the right to withdraw his/her consent at any time. The request concerning the withdrawal of consent must be presented in a document signed in his/her own hand or similarly authenticated via e-mail to the person stated in section 2 of this privacy statement. Any processing of personal data taking place before the withdrawal of consent will not become illegal even if the consent is withdrawn.

13. Rectification and erasure of data and restriction of processing

The controller must, without undue delay, on its own initiative or at the request of the data subject, rectify, erase or supplement any personal data in the data file if the data is inaccurate, unnecessary, incomplete or expired for the purposes of the processing.

The controller must also prevent the distribution of such data if the data may risk the privacy protection or rights of the data subject.

At the request of the data subject, the controller must restrict the processing if the data subject has contested the accuracy of his/her personal data or stated that the processing is unlawful and opposed the erasure of his/her personal data and requests the restriction of its use instead.

The controller must also restrict the processing when the controller no longer needs the personal data in question for the purposes of the processing but the data subject informs the controller that he/she needs it to draft, issue or defend a legal claim. In addition, the controller must restrict the processing when the data subject has opposed the processing of the personal data under the General Data Protection Regulation while waiting for verification on whether the controller's legitimate grounds for processing supersede the grounds presented by the data subject. If the controller has restricted the processing due to the grounds mentioned above, the controller must issue a notification to the data subject before withdrawing the processing restriction.

Any rectification requests must be presented to the contact person stated in section 2 of this privacy statement.

14. Right of appeal

The data subject shall have the right to lodge a complaint with a competent supervisory authority if Fintraffic ANS Ltd. has not complied with the applicable data protection regulations in its operations.