

Privacy Notice Fintraffic Sky

1 Introduction

Protecting your privacy and ensuring transparency in the processing of your personal data is important to the Fintraffic Group. The purpose of this privacy notice is to inform you about the processing of your personal data in the Fintraffic Sky service. The processing of your personal data complies with the EU General Data Protection Regulation (EU) 2016/679 and national data protection legislation.

2 Data Controller

Name Business ID

Fintraffic Air Navigation Services Ltd 2767840-1

Address P.O. Box 157, 01531 Vantaa

Switchboard +358 (0) 20 4284 000

Data Protection Officer Corporation Protection Officer teppo.valtanen@fintraffic.fi +358 29 450 7000 +358 29 450 7000 +358 29 450 7000

3 Categories of Data Subjects and Processed Personal Data

Categories of Data Subject

The application includes personal data about its users.

Processed Personal Data

Data collected from the use of the application:

- User ID (<u>FintrafficID</u>)
- Log data

Contact information and other identification details to be included in the flight plan form:



- Full name
- Email address
- Phone number
- Aircraft-related data such as registration ID (for flight plans)

4 Sources of Personal Data

Data collected from the data subject

Contact information and other identification details to be included in the flight plan form, such as name, phone number, email address, and aircraft description details, such as the aircraft's registration number.

Data collected from registering as a user of the application and using it.

Data collected from third parties:

None

5 Purpose and Legal Basis for Processing

The purpose of the processing

The Fintraffic Sky application is an aviation situational awareness application and flight planning tool.

The processing of user data is necessary to provide the service and its features. User accounts are implemented through Fintraffic ID, and the processing of personal data related to this is subject to the Fintraffic ID <u>privacy notice</u>.

In the Fintraffic Sky application, users can create flight plans (for aircraft and drone operators). Air traffic control processes the personal data of such users to manage flight plans in order to ensure the safety and efficiency of air traffic in accordance with international agreements and laws.

Legal basis for the processing of personal data

Air traffic control processes personal data to manage flight plans in order to ensure the safety and efficiency of air traffic in accordance with international agreements



and laws. The legal basis for the processing of personal data is the fulfillment of air traffic control's legal obligations.

Legal Basis	Processing Based on the Legal Basis
Consent	Registration and related data processing.
Legal obligation	Processing of flight plans.
Legitimate interest	Processing log data for system maintenance and issue investigation.

6 Data Disclosures and Recipients

The controller ensures, through internal guidelines and written data processing agreements, that each recipient complies with the regulations related to the processing of personal data.

Other companies belonging to the controller's corporate group may process your personal data based on the controller's legitimate interest. However, your data will only be disclosed and processed within the group to the extent necessary for the purposes described in this privacy notice.

Your data is disclosed to the following parties:

Disclosures to Data Processors

The controller may use subcontractors for managing access rights as well as for the maintenance, development, and operation of the service. In such cases, personal data may be transferred to subcontractors to the extent necessary for the provision of the services.

The data processor may process your personal data only in accordance with the instructions provided by the controller.

Disclosures to Third Parties

The controller does not disclose personal data to third parties except in relation to procedures concerning flight plans.

Transfers of Personal Data Outside the EU or EEA.

Personal data is not transferred outside the EU or EEA.



7 Data Retention

Your personal data will be processed only for as long and to the extent necessary to fulfill the purposes described in this privacy notice. Once there is no longer a legal basis for processing or your personal data is no longer needed, the data will be properly deleted.

Personal data is retained in accordance with the <u>privacy notice</u> concerning flight plans and the <u>privacy notice</u> for FintrafficID.

Log data generated by the application is retained in centralized log management for one year.

8 Data Protection Measures

The data controller has appropriate technical and organizational measures in place to protect personal data. Through these measures, the data controller ensures that the personal data of the data subject is not accidentally or unlawfully destroyed, lost, or altered. Additionally, the data controller ensures that the data is not disclosed without authorization and that it cannot be accessed by parties who do not have the right to process the data.

9 Rights of the Data Subject

The right to be informed about the processing of one's data, the right to access one's data, and the right to request the rectification of one's data

You have the right to obtain confirmation from the data controller as to whether or not your personal data is being processed. If your personal data is being processed, you have the right to receive a copy of the personal data undergoing processing, as well as information about the purposes of the processing and other aspects related to the nature of the processing.

If your personal data is incomplete or otherwise inaccurate, you have the right to request that the data controller rectify your personal data.

The right to request the erasure or restriction of the processing of one's data, as well as the right to object to the processing

You have the right to request that the data controller erase your personal data in situations where, for example, the data controller no longer needs your personal data for the original purpose, your personal data is being processed unlawfully, or you withdraw your consent, which was the legal basis for the processing. However, if



retaining your personal data is necessary for the establishment, exercise, or defense of legal claims, the data controller is not obliged to erase your data.

You may request that the data controller restrict the processing of your personal data to storage only, for example, in situations where it is unclear whether your personal data is accurate or whether it has been processed lawfully.

When the legal basis for processing your data is the data controller's legitimate interest, a task carried out in the public interest, or the exercise of official authority, you have the right to object to the processing based on reasons related to your particular personal situation. However, if there is a compelling and legitimate reason for the processing that overrides your rights, the processing of your data may continue.

The right to withdraw your consent

If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. After you withdraw your consent, the data controller may no longer process any of your personal data that was based solely on that consent. The withdrawal of consent does not affect the lawfulness of the processing carried out before the withdrawal.

The right to request the transfer of your data in a structured, commonly used, and machine-readable format from one data controller to another

If the processing is based on your consent or the performance of a contract and is carried out by automated means, you have the right to require that your data be transferred directly from one data controller to another in a technically feasible manner.

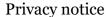
Exercising the rights of the data subject

The actions taken by the data controller in response to your request are, in principle, free of charge for you. However, fulfilling your request requires that you can be reliably identified. Therefore, the data controller may, if necessary, require you to verify your identity when submitting the request.

The data controller will respond to your request without undue delay and, in general, no later than one month from the date of receipt of the request.

10 Submitting the matter to the Data Protection Ombudsman

If you believe that the processing of your personal data does not comply with data protection legislation, you can lodge a complaint with the supervisory authority. In





Finland, the competent supervisory authority is the Office of the Data Protection Ombudsman:

Visiting address: Lintulahdenkuva 4, 00530 Helsinki

Postal address: P.O. Box 800, 00531 Helsinki

Switchboard: +358 29 566 6700 Registry office: +358 29 566 6768

Email (registry office): tietosuoja(at)om.fi

However, the data controller hopes that you will first raise any concerns you have with the data controller. For more information on the rights of the data subject, please visit: https://tietosuoja.fi/yksityishenkilot.