

PRIVACY STATEMENT

date: 28 Aug 2018

EU General Data Protection Regulation, Articles 13 and 14

1. Controller	Air Navigation Services Finland Oy Business ID: 2767840-1 Street address: Lentäjätie 1, Stair B, FI-01530 Vantaa Postal address: PO Box 157, FI-01531 Vantaa Tel. (exchange): +358 20 4284 000 ans@ansfinland.fi
2. Contact person(s) in matters relating to the filing system	Jari Toivonen, ATM Manager Street address: Lentäjätie 1, Stair B, FI-01530 Vantaa Tel.: +358 20 4284 000 ans@ansfinland.fi
3. Name of the filing system	Air Navigation Services Finland Oy's (hereinafter referred to as "ANS Finland") flight plan filing system.
4. Purpose of processing personal data and legal basis for processing	<p>The purpose of processing personal data is implementing the air navigation services of ANS Finland and securing the necessary flow of information in air traffic.</p> <p>The legal basis for processing personal data is compliance with a legal obligation to which the controller is subject (implementing air navigation services and securing the necessary flow of information in air traffic) and enabling the contacts required for flight plan processing.</p> <p>The collection of data is not based on consent.</p>
5. Recipients of personal data	<p>Flight plans are distributed to operators providing air navigation services via both a national and an international closed aeronautical network. Flight plans are distributed to the operators necessary for each flight route, such as air traffic control units. The operations are based on the ICAO Doc 4444 document of the International Civil Aviation Organization (ICAO). Our operations are guided by ICAO's regulations.</p> <p>Flight plans are stored in external data centre services. External data centre services refer to the data centre services of DataCenter Finland Oy and Enfo Oyj as well as the European AIS Database (EAD) owned by EUROCONTROL. Access to data is restricted to a limited number of employees of the companies mentioned hereinabove.</p> <p>If necessary, data is disclosed to be used by the authorities, such as the police and customs. However, data is not disclosed for commercial purposes.</p> <p>The recipients of data from the filing system are responsible for the processing of personal data they have received from ANS Finland</p>

	as controllers in accordance with the applicable laws.
6. Data content of the filing system	<p>Personal identification data:</p> <p>Aircraft identification Other information (telephone number of the pilot in command, other personal data provided by the author of the flight plan, etc.) Pilot in command (name) Author (name) Tel. (telephone number) E-mail (e-mail address) Fax</p> <p>Other information:</p> <p>See https://www.ais.fi/en/pre-flight-information-service-and-flight-plans/fpl-instructions (Instructions for completing the flight plan form (FPL) (PDF))</p> <p>The data contained in this filing system is also used in other systems supporting air navigation services to ensure smooth and safe air traffic. In addition, the data can be used internally for statistical purposes.</p>
7. Data sources	The data stored in the filing system is obtained directly from the data subject through the FPL forms available online as well as by telephone and via e-mail.
8. Disclosure and transfer of data to countries outside the European Union or the European Economic Area	ANS Finland has a statutory obligation under ICAO Doc 4444 to disclose data in the filing system to the operators necessary for each flight route and to parties specifically requested by the customer, which may be located either within the European Union or the European Economic Area or outside of them. Such parties include, for example, handling companies.
9. Storage period of data	The personal data contained in the filing system is stored for two years for the purpose of accident investigation and/or official requests.
10. Principles of data protection	<p>The personal data contained in this filing system is protected by technical and organisational measures against unfounded and/or unlawful access, alteration and destruction or other unfounded or unlawful processing, including unauthorised disclosure and transfer of the data in this filing system.</p> <p>The data is stored in electronic systems protected by firewalls, passwords and other appropriate technical solutions. Access to the filing system is restricted to certain persons employed by ANS Finland and other specified persons who need the data to perform their duties. All persons with access to the data in the filing system are bound by professional secrecy.</p> <p>Employees who process the data contained in this filing system as part of their duties are trained and instructed in matters relating to privacy protection and data security.</p>

<p>11. Right to review and exercising it, and the right to data portability</p>	<p>The data subject has the right, after providing the information necessary to find the data, to know what data concerning him or her are stored in this filing system or that the filing system does not contain data concerning him or her. In addition to the name of the data subject, the information considered to be necessary to find the data includes the identifications of the aircrafts for which the data subject is the pilot in command and for which the data subject has filed flight plans.</p> <p>At the same time, the controller will inform the data subject of the filing system's regular data sources and where the data in the filing system is used and regularly disclosed.</p> <p>A data subject who wishes to review the data concerning him or her as described hereinabove must submit a request to that effect to the contact person specified in section 2 of this privacy statement with a personally signed or similarly verified document.</p> <p>The data subject has the right to receive the personal data concerning him or her that he or she has provided the controller in a structured, commonly used and machine-readable format.</p>
<p>12. Correction, erasure and restriction of the processing of data</p>	<p>Any inaccurate personal data contained in a flight plan may be rectified or supplemented at any time before the flight in accordance with the flight plan or during the flight. The flight plan is filed after the flight, which is why the personal data contained in the flight plan can no longer be changed at that time to allow the data to be traced, if necessary.</p> <p>With consideration of the above, the controller must, without undue delay on its own initiative or at the request of the data subject, rectify, erase or supplement the data in the filing system that is inaccurate, unnecessary, incomplete or outdated with regard to the purpose of processing. The controller must also prevent the dissemination of such data if the data may compromise the privacy of the data subject or his or her rights.</p> <p>With consideration of the above points and the statutory obligations of the controller as a provider of air navigation services, the controller must, at the request of the data subject, restrict processing if the data subject has contested the accuracy of his or her personal data or if the data subject has alleged that the processing is unlawful and has opposed the erasure of his or her personal data and requested the restriction of its use instead. The controller must also restrict processing if the controller no longer needs the personal data for the purposes of the processing, but the data subject states that he or she requires the data for the establishment, exercise or defence of legal claims.</p> <p>Requests for rectification must be submitted to the contact person mentioned in section 2 of this privacy statement.</p>

13. Right of appeal	The data subject has the right to lodge a complaint with the competent supervisory authority if ANS Finland has failed to comply with applicable data protection regulations in its operations.
14. Contacts	<p>The data subject must submit the requests concerning his or her rights in writing or via e-mail to the contact person mentioned in section 2 of this privacy statement.</p> <p>ANS Finland may ask the data subject to specify the request and verify his or her identity before processing the request. ANS Finland may refuse to execute the request on grounds laid down in the applicable law.</p> <p>ANS Finland will respond to requests within one (1) month of the submission of the request, unless there are special reasons for changing the response time.</p>
15. Automated decision-making and profiling	The data in the filing system is not used for automated decision-making or the profiling of data subjects.
16. Changing the privacy statement	ANS Finland is continuously developing its business and therefore reserves the right to change this privacy statement by giving notice of this on its website. Changes may also be based on changes in the legislation. ANS Finland recommends data subjects to regularly review the content of the privacy statement.