

PRIVACY STATEMENT

date: 10 Dec 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	Riikka Holma, Designer Oula Paltto, Designer 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") AIS newsletter subscriber filing system.
4. Purpose of processing personal data and legal basis for processing	<p>The purpose of processing personal data is to maintain a list of AIS newsletter subscribers to enable the service.</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 the legitimate interest of the controller or a third party (monitoring and improving customer experience, statistical purposes).</p> <p>The collection of data is not based on consent.</p>
5. Recipients of personal data	<p>The personal data is stored in external data centre services. External data centre services refer to the data centre services of Koodiviidakko Oy and Enfo Oyj.</p> <p>The personal data is processed with the Postiviidakko newsletter tool. Backup copies are also made of the personal data. Access to data is restricted to a limited number of employees of the companies mentioned hereinabove.</p> <p>If necessary, ANS Finland discloses data to be used by the authorities, such as the police and customs. However, data is not disclosed for other uses, such as commercial purposes.</p> <p>We use Google's reCAPTCHA service to make sure that the AIS newsletter subscriber is a natural person. The service includes sending session information to Google:</p> <p>https://policies.google.com/privacy?hl=en</p>
6. Data content of the filing system	Name (subscriber's name) E-mail (subscriber's e-mail address)

	<p>List memberships (information on whether the subscriber has subscribed to the Finnish and/or English AIS newsletter)</p> <p>AIS newsletter subscribers can also report other information about themselves in addition to the information hereinabove, such as the reason for cancelling the AIS newsletter.</p> <p>The data contained in the filing system 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 Postiviidakko's online forms.
8. Disclosure and transfer of data to countries outside the European Union or the European Economic Area	The data will not be disclosed to countries outside the European Union or the European Economic Area.
9. Storage period of data	<p>ANS Finland stores personal data in accordance with the applicable legislation and only as long as is necessary to execute the purposes specified in this privacy statement. Due to obligations under the applicable legislation, it may be necessary to store data for longer than the period mentioned hereinabove.</p> <p>We strive, using reasonable measures, to keep the personal data we hold accurate by erasing unnecessary data and updating outdated data. The data is entered in the filing system as it is obtained from the data subject and the data is updated according to what the data subject reports to the controller.</p>
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 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>
11. Right to review and exercising it, and the right to data portability	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. 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>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>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>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. In addition, the controller must restrict processing when the data subject has objected to the processing of personal data pursuant to the General Data Protection Regulation pending the verification of whether the legitimate grounds for the processing of the controller override those put forward by the data subject. If the controller has restricted processing on the above grounds, the controller must notify the data subject before the restriction of processing is lifted.</p> <p>Requests for rectification must be submitted to the contact person mentioned in section 2 of this privacy statement.</p>
<p>13. Right of appeal</p>	<p>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.</p>
<p>14. Contacts</p>	<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>

	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.
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.