



**FINNAIR PRIVACY POLICY FOR ETHICS
HELPLINE REPORTS**

This Finnair Privacy Policy for Ethics Helpline Reports (hereafter "Privacy Policy" or "Policy") informs you of how we collect and process your personal data. This Policy provides information as required by the European Union General Data Protection Regulation (Regulation (EU) 679/2016) and describes the practices and purposes of personal data processing at Finnair.

The Privacy Policy covers all the personal information that we process based on the reports filed through the Ethics Helpline. You can find more information about the processing of your personal data under each topic below.

We may update this Privacy Policy from time to time.

Controller for the data collected in Finnair Ethics Helpline

Finnair Oyj (hereinafter "Finnair")
Postal address: PL 15, 01053 Finnair
Visiting address: Tietotie 9, 01530 Vantaa
Business ID: 0108023-3

Name of the register

Register of Ethics Helpline reports

Contact details in matters concerning the register

compliance@finnair.com

Contact details of the Data Privacy Officer

Finnair Data Privacy Officer
privacy@finnair.com

Purposes and legal basis for the processing of personal data

The purpose of Finnair Ethics Helpline is to enable reporting when there are concerns on non-compliance, such as violation of the law, suspected fraud or misconduct, or other unethical behaviour.

The legal basis for processing personal data is our legal obligation to comply with the applicable legislation. For the purposes of monitoring compliance with applicable laws and the Code of Conduct, the legal basis for processing is our legitimate interest.

Data subject categories

Persons who report or natural persons who are subject of the report.

The personal data processed

The reports can be filed anonymously through the Ethics Helpline. Thus, the reports primarily do not contain personal data of the sender. If, however, personal data is

provided in the report by the sender, the data may contain the name and contact information of the person who files the report.

If the subject of the report is a natural person, the report may contain personal data of the subject of the report, e.g. name.

Data retention period

Data retention period for personal data is based on the legislation. The section 29 of the Whistleblower Act (1171/2022) states that the organization must delete the information coming through the report channels in five years after the report has been received unless retention is necessary for the implementation of the rights or obligations stipulated in this or other law, or for the preparation, presentation, or defense of a legal claim. Personal data that is clearly not necessary for the processing of the reports filed will be deleted by anonymizing it without undue delay.

Disclosure of personal data

In principle, we do not share your personal data with third parties. However, if the report is submitted in a language other than Finnish or English, or the report is submitted by phone, it will be translated/written by a translation agency in the secure SpeakUp environment. Data might be transferred to authorities if necessary due to legal obligations.

Transfer of personal data to third countries or international organisations, and the safeguards employed

Your personal data is not transferred outside the European Economic Area (EEA). All data on the SpeakUp web service, i.e. Ethics Helpline, is encrypted and stored within the Netherlands. All communication via the SpeakUp web service is encrypted.

Impact of personal data processing and general description of the technical and organisational security measures

Finnair takes appropriate technical and organisational measures to ensure the security of your personal data and protect it against loss or unlawful use. In practice this means that your personal data is protected in accordance with the sensitivity of the data. The access to personal data is restricted by access controls, and processing of personal data is logged. Our information technology environment is appropriately protected and monitored, with regular updates, testing and assessment to ensure ongoing security. Our personnel are trained to comply with applicable data privacy and data protection legislation as well as with Finnair policies. The nominated persons processing data are bound by confidentiality obligations.

Rights of the data subject

The data subject has the right of access to personal data. The data subject has the right to receive information about what personal data has been stored about them or that there is no data about them in the register. The data subject's right of access may be restricted if it is necessary and proportionate for ensuring the accuracy of the report or to protect the identity of the person who has filed the report (Whistleblower Act (1171/2022) section 31, subsection 2).

The data subject has the right to demand the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

The data subject's right to restrict the processing of personal data does not apply to the processing of personal data referred to in the Whistleblower Act.

You may exercise your rights by contacting privacy@finnair.com. We will let you know if we cannot fulfil your request, and provide the reasons behind such decision. Making a personal data request is free of charge once every six (6) months. For additional requests during this time frame, we may charge a reasonable fee to cover the administrative costs involved. We reserve the right to reject requests that are unreasonably frequent or extensive and manifestly unfounded.

The data subject has the right to file a complaint to the supervisory authority if he considers that the processing of his personal data violates the applicable data protection regulations.

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