

Finnair Transparency Register Privacy Notice

This Transparency Register Privacy Notice (hereafter “Privacy Notice” or “Notice”) has been provided to inform you about how we collect and process your personal data. This Privacy Notice addresses the informational duties of the EU General Data Protection Regulation (“GDPR”) and lays out the practices of employees, representatives, and lobbying targets regarding applicable transparency registers (“Registry”) personal data processing at Finnair. This Privacy Notice only covers personal data processing carried out by Finnair and not by any third parties operating any site or service incorporating or linking to our services. You can find more information about the processing of your personal data in the sections below.

Finnair is committed to protecting and respecting your privacy. When processing any personal data, Finnair will always comply with and abide by the applicable personal data and data protection legislation and use it in accordance with applicable privacy laws and for the purposes set out in this Privacy Notice.

This Privacy Notice may be updated from time to time.

Data controller

Finnair Plc (0108023-3)
Tietotie 9, 01530 Vantaa, Finland

Name of the register

Finnair’s Internal Transparency Register

Contact details in matters concerning the register

transparency@finnair.com

Contact details of the Data Privacy Officer

Finnair Data Privacy Officer
privacy@finnair.com

Purpose and legal basis for processing personal data

Based on our legal obligations

Finnair needs to collect and use certain types of personal data of Finnair employees, representatives and lobbying targets (e.g. a Member of Finnish Parliament or a public official of a ministry) Finnair deals with to carry out its legal obligation regarding Transparency and Lobby Registers.

We collect personal data about you when you are a lobbying target, a Finnair employee or representative who conducts advocacy, influence or lobby towards lobbying targets. Finnair will report collected information to the competent authorities according to its legal obligations. In Finland, this obligation refers to Section 8 of the Transparency Register Act (430/2023).

Data subject categories

Finnair employees, representatives and lobbying targets (e.g. a Member of Finnish Parliament or a public official of a ministry).

Personal data processed

The information we collect and process about the lobbying targets include first name, last name, email address, organization, and responsibility area or job title. In addition, we collect information on the topic of advocacy, influence or lobbying measure, means of communication and contacting, date of the meeting, and any other information we may need to fulfil our legal obligation.

Information that we collect about Finnair employees and representatives include first name and last name. We also collect and process the details of the specific company that the Finnair employee or representative represents in an individual advocacy, influence or lobbying event.

Information we collect about you is to be used only for the above-described purposes.

Regular data sources

Personal data is obtained from public sources, such as the websites of Parliament and ministries, and directly from the data subjects themselves.

Retention periods for personal data

Personal data is stored for as long as it is needed for the purpose it was originally collected for. When the advocacy, influence or lobbying event ends, personal data continues to be stored for as long as necessary, based on its original purpose. Maximum period for storing is 10 years.

Disclosure of personal data

Finnair uses personal data in its database only for its internal purposes. In Finland Finnair reports collected information to the competent authorities according to Transparency Register Act (430/2023).

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

Personal data is not transferred to third countries or international organisations.

Impacts of personal data processing and general description of technical and organisational security measures

At Finnair, we have implemented appropriate technical and organisational measures to safeguard your personal data and their accessibility, and to prevent their unauthorised use. The circle of users with access to personal data is restricted on a need-to-know basis and by access controls. 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 protection legislation as well as applicable policies and instructions. We do our best to keep your data secure. If, however, a security breach should occur, we will inform you according to the requirements of data protection legislation.

Rights of the data subjects

Right of access

You have the right to access the personal data held about you. You have the right to receive information about what personal data has been stored about you or that there is no data about you in the register. We will provide you with a copy of your personal data unless we have a legal reason not to share this data with you or if providing the information would seriously infringe on your or others' rights.

Right to correct

You have the right to have inaccurate or incomplete personal data about you rectified or updated.

Right to erasure

You may ask us to delete your personal data from our systems if your data is no longer needed for the purposes for which they were collected. You may also ask us to delete your personal data if your data has been unlawfully processed. We will erase such personal data from our systems without undue delay unless we have legal bases to continue processing such data. This may be the case if the data is necessary for complying with our legal obligations or for exercising or defense against legal claims

Right to restrict

Under certain circumstances, you may request that we restrict the processing of your personal data. This may be the case if your data has been unlawfully processed and you wish to restrict processing instead of having such data erased. Additionally, you can request restricting the processing of your data in cases where you have objected against the processing of your data, and your request is pending in the process.

Right to withdraw your consent

You have the right to withdraw any consent you previously provided to us.

Right to data portability

In some cases, you have the right to receive your personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

How to use your rights

You can exercise your rights by contacting transparency@finnair.com or by addressing your request to Government and Institutional Relations -team, Tietotie 9, 01530 Vantaa, FINLAND. You may be asked to specify your request in writing if necessary. If the request cannot be fulfilled, you will be informed of the reasons for the decision.

Making a personal data request is free of charge. We reserve the right to reject requests that are unreasonably repetitive, excessive or clearly unfounded

Lodging a complaint

You have the right to file a complaint with the supervisory authority if you believe that the processing of your personal data violates applicable data protection regulations.