

## DRIVER'S CARD LOYALTY PROGRAMME AND SSCI SERVICE – PRIVACY NOTICE

Finnlines Plc (“**Finnlines**” or “**we**”) is committed to protecting the privacy of your personal data. This Privacy Notice is applicable to our Driver’s Card Loyalty Programme (“**Driver’s Card Programme**”) and our Driver Self-Service Check-In Application (“**SSCI Service**”) as well as processing of personal data relating to the users of the Driver’s Card and the SSCI Service. This Privacy Notice explains how we collect and use personal data and what rights these users have under applicable data protection laws, including the EU General Data Protection Regulation (2016/679, “**GDPR**”).

You can find the terms and conditions of the Driver’s Card Programme [here](#) and the terms and conditions of the SSCI Service [here](#).

Kindly note that this Privacy Notice may be updated from time to time.

### 1 Controller and Contact Information

Controller’s name: Finnlines Plc;  
Business ID: 0201153-9;  
Address: Komentosilta 1, 00980 Helsinki, Finland.

Should you have any questions regarding the processing of personal data or if you wish to use your rights under applicable data protection laws, please contact us by e-mail at the following address: [dataprivacyofficer@finnlines.com](mailto:dataprivacyofficer@finnlines.com) or by phone on the following number +358 44 344 5598.

### 2 Purposes and Legal Bases for Processing of Personal Data

We process personal data for the following purposes:

#### (1) Driver’s Card Loyalty Programme

We process personal data relating to the membership in Driver’s Card Programme. The processing of personal data is necessary for the performance of a contract to which the respective Driver’s Card member is (directly or indirectly via the business customer) a party, including providing and managing this membership, implementing and developing the Driver’s Card Programme as well as providing the members discounts and benefits in accordance with the terms of the Driver’s Card Programme (GDPR Art. 6(1)(b)).

For this purpose, we collect and process the following personal data:

- Identification data (such as name, gender, date of birth, and nationality);
- Contact details (such as address, email address, and phone number);
- Membership data (such as Driver’s Card membership number, marketing consents and prohibitions);
- Purchase data (such as purchases onboard the vessel) when this information is voluntarily provided by the user by using the Driver’s Card when making purchases;
- Service data (such as requested specified and utilised services on the vessel) when this information is voluntarily provided by the user by using the Driver’s Card when requesting or purchasing services; and
- Customer feedback, when this information is voluntarily provided by the user.

This personal data is strictly required for the Driver’s Card membership, unless otherwise indicated above.

## **(2) SSCI Service Provision**

The SSCI Service is only provided to the members of the Driver's Card Programme. In order to use the SSCI Service, each user has also to register to the Driver's Card Programme. Therefore, we process personal data relating to this membership of the users when they use our SSCI Service. The processing of personal data in this case is necessary for the performance of a contract to which the respective Driver's Card member is a party, including membership related access rights allowing the users to use the SSCI Service (GDPR Art. 6(1)(b)). For this purpose, we process the personal data described above in Section (2.1).

We collect and process personal data relating to the users when they check-in by using our SSCI Service. The processing in connection with check-in is necessary for the purposes of identifying all passengers onboard as well as to provide the journey and services on our vessels. If the user has enrolled in our other services, we will process such data provided during booking in order to provide the requested other service (for instance specified cabin or special assistance). The processing of personal data is based on our legitimate interest in providing the user (and the business customer) the requested services, including the SSCI Service, as agreed with the business customer (that the user represents). This processing is based on Art. 6(1)(f) of the GDPR.

For this purpose, we process the following personal data:

- Identification data (such as name, gender, date of birth, nationality)
- User's Driver's Card membership number
- Contact details (such as postal address, email address and phone number);
- Check-in data (such as booking number, shipper ID, voyage data, cargo data and travel documents);
- Service data (such as requested specific services on the vessel); and
- Preferred language.

This personal data is strictly required for the provision of the SSCI Service.

## **(3) Marketing**

We collect and process personal data relating to the users when they use the Driver's Card to utilise our services or shop onboard our vessels and when they check-in by using our SSCI Service. We process this data for the purposes of designing, developing and implementing the Driver's Card Programme, our business, customer service, and the products and services offered to the users on our vessels. We also process the data in order to conduct statistics, analysis and surveys. The legal basis for the processing of personal data is Finnlines' legitimate interest to develop and improve our onboard services and business activities and enable their implementation, implement effective marketing that is interesting to the users, as well as to offer and develop customer service and process customer feedback. This processing is based on Art. 6(1)(f) of the GDPR.

Further, we process personal data for directing marketing and communications to the user, such as targeting and giving information on benefits and other content, notifications and marketing, including processing personal data for the purposes of direct marketing. We also process personal data for the purposes of creating profiles to optimize direct marketing. We may utilise subcontractors for communication and marketing purposes. The legal basis for the processing of personal data in these cases is the user's consent to the processing of their personal data for one or more specific purposes. This processing is based on Art. 6(1)(a) of the GDPR.

For this purpose, we process the following personal data:

- Contact details (such as address, email address, and phone number);
- Membership data (such as name, Driver's Card membership number, marketing consents and prohibitions);
- Purchase data (such as purchases onboard the vessel);
- Service data (such as utilised services on the vessel);
- Voyage data when the user checks-in by using the SSCI Service; and
- Preferred language.

When the processing of personal data is based on consent, the user may withdraw their consent at any time. The user may withdraw their consent to electronic direct marketing by clicking the link at the bottom of each marketing email or by following the instructions in the mobile marketing message. The consent can be also withdrawn via the Driver's Club Membership Portal.

Further, the user can prohibit the collection of personal data for the purposes of profiling and prohibit the processing of their voyage data by contacting Finnlines customer service at the following address: [drivers@finnlines.com](mailto:drivers@finnlines.com).

#### **(4) Passenger Record**

Further, we collect and process personal data relating to the users of our SSCI Service to fulfil our legal obligation to count and maintain a register of ship passengers in accordance with the Finnish Act on Registration of Ship Passengers (1038/2009) and respective EU Directives (98/41/EC and 2017/2109/EU). This processing is based on Art. 6(1)(c) of the GDPR and Section 6(1)2) under the Finnish Data Protection Act (1050/2018) in case special categories of personal data is processed.

For this purpose, we collect and process the following personal data:

- Identification data (such as name, gender, date of birth, and nationality);
- Contact details (such as postal address, email address, and phone number);
- Any requirement for special assistance when this information has been voluntarily provided by the user;
- Contact number in case of emergency when this information is voluntarily provided by the user.

This information is strictly required by law, unless otherwise indicated above.

#### **(5) SSCI Service Analytics**

We process data generated by the users when they use the SSCI Service, including IP address, device and software used, time and duration of visit, navigation details through service and other similar information relating to operating system and computer environment. This data is processed in order to analyse how our users use the SSCI Service so that we can develop and improve the SSCI Service. Such analytical data is not used to identify any individuals.

The legal basis for the processing of personal data in this case is either (i) Finnlines' legitimate interest to ensure proper functionality of the SSCI Service and to constantly look ways to develop and improve the SSCI Service (GDPR 6(1)f) or (ii) the user's consent, for example when we require a consent for optional analytics cookies we use for the SSCI Service (GDPR Art. 6(1)(a) and ePrivacy Directive (2002/58/EC) Art. 5(3)). As regards the use of cookies, please visit our Cookie Notice for more information.

This information is not mandatory, and the users can object to the processing or deny the use of cookies.

#### **(6) Other Legal Obligations and Legal Proceedings**

When the user uses the SSCI Service, we disclose the users' personal data to port authorities or private port organisations and other competent public authorities when required by law or by authority or court decision. Such disclosure may also be based on the user's consent, for example if required by local law, or when disclosure is carried out to facilitate fast automated check-in in connection with the use of SSCI Service as requested by the user. This processing is based on legal obligation under Art. 6(1)(c) of the GDPR or on the user's consent under Art. 6(1)(a) of the GDPR.

Further, we may process the users' personal data to comply with local laws, such as accounting laws, or in the event of a legal claim or complaint, including regulatory investigations or legal proceedings. This processing is based on legal obligation under Art. 6(1)(c) of the GDPR or on our legitimate interest for the establishment, exercise, or defence of legal claims under Art. 6(1)(f) of the GDPR.

This information is either strictly required by law or necessary to pursue our legitimate interest.

### **3 Retention Periods for Personal Data**

Personal data will be retained for as long as is necessary to fulfil the purposes described above in section 2. Therefore, the retention period will depend on the data concerned and its purpose of use. The retention periods are determined in accordance with the following criteria:

- Personal data related to Driver's Card Programme will be retained during the user's membership and two (2) years thereafter. The purchase and service data will be retained for ten (10) years.
- Personal data related to SSCI Service and other requested services will be retained in the operating system of this SSCI Service until the check-in is performed by the user.
- Personal data related to SSCI Service and other requested services may be transmitted to other operating systems of Finnlines, when it is necessary to provide these services, and retained in such other systems at least until the requested services have been produced and completed by Finnlines. The more specific retention periods for these other systems are as follows: Personal data processed in our enterprise resource planning system will be destroyed within seventy-two (72) hours after the vessel has safely completed its voyage.
- Personal data related to our legitimate interest will be retained for ten (10) years.
- Personal data related to marketing will be retained, provided that the consent has not been withdrawn, for ten (10) years. The withdrawn consent or prohibition related to marketing and profiling will be destroyed within three (3) years after the consent was withdrawn or prohibition given.
- Personal data for the purpose of passenger records will be retained as long as required by the applicable legislation. The passenger records (a list of persons on board) will be destroyed within seventy-two (72) hours after the vessel has safely completed its voyage, but no later than sixty (60) days from the vessel's departure, unless such personal data is necessary for a longer period of time due to search or rescue operations or accident investigations.

- Personal data related to service provision may be retained even after the respective contract term if required by local laws, such as accounting laws, or in the event of a legal claim or complaint, including regulatory investigations or legal proceedings.
- As regards to data collected using cookies, please visit our Cookie Notice for more information about expiration times.

#### **4 Regular Sources of Data**

We collect personal data directly from the users when they register to the Driver's Card Programme, when they enter information to the Driver's Card Membership Portal and when they use our SSCI Service. We also collect data from the Driver's Card members when they utilise our services or shop onboard our vessels. Further, some personal data related to the respective user can be collected from the business customer which has made the booking, and which is represented by the user when using the SSCI Service. As a member of the Driver's Card Programme, you can update and manage your personal data on the Membership Portal at any time.

#### **5 Data Disclosures**

Personal data may be disclosed to public authorities, such as port authorities or private port organisations, customs and border guards, the police and traffic authorities, when required by law or by authority or court decision. Such disclosure may also be based on the user's consent, for example if required by local law, or when disclosure is carried out to facilitate fast automated check-in in connection with the use of SSCI Service as requested by the user.

Further, we may use third-party ICT service providers for ICT support and maintenance purposes. These service providers process personal data on behalf of us and in accordance with our instructions. We ensure that personal data processed by the respective service providers are processed in accordance with appropriate confidentiality and data processing agreements and applicable data protection legislation.

#### **6 Data Transfers Outside of the EEA**

Personal Data is processed only in the EU/EEA.

#### **7 Principles of How the Personal Data is Secured**

Personal data will be processed lawfully, fairly and in a transparent manner, collected for specified, explicit and legitimate purposes, and will not be further processed in a manner that is incompatible with said purposes mentioned in this Privacy Notice. We will only process adequate and relevant personal data, limited to what is necessary in relation to the purposes for which it is processed.

We use appropriate technical and organisational measures designed to protect the personal information that are collected and processed. The measures used provide an adequate level of security for the processing of the personal data of the data subjects.

Only individuals, who due to their duties as employees are authorised to access the personal data, are entitled to process the personal data. The personal data is protected by firewalls, access control (personal usernames and passwords) and other adequate technical means.

#### **8 Rights of Data Subjects**

You as a data subject have a right to receive information on whether your personal data are being processed and if such data are processed, you have a right to access your data. You also have a

right to ask for your data to be rectified or deleted or for the processing to be restricted within the limitations set out in and in accordance with applicable data protection legislation. Further, under the conditions laid out in the applicable data protection legislation, you have a right to object to the processing of your personal data as well as a right to data portability.

Where the processing is based on your consent, you have the right to withdraw your consent at any time. Please notice that a withdrawal of your consent will not affect the lawfulness of the consent-based processing taking place before your withdrawal of consent. For more information on your right to withdraw your consent or object to the processing, please see Section (2.3) above.

Any request concerning exercising your rights shall be made to Finnlines' Data Protection Officer by email at the following address: [dataprivacyofficer@finnlines.com](mailto:dataprivacyofficer@finnlines.com).

You are entitled to lodge a complaint with a supervisory authority regarding the processing of your personal data, if you are dissatisfied with how your personal data is processed. The supervisory authority in Finland is the Data Protection Ombudsman (<https://tietosuoja.fi/en/home>).