

## FINNLINES WI-FI – PRIVACY NOTICE

Finnlines Plc ("**Finnlines**" or "**we**") is committed to protecting the privacy of your personal data. This Privacy Notice is applicable to the Wi-Fi services provided by Finnlines ("**Finnlines Wi-Fi**") publicly available on some Finnlines vessels and on Finnlines premises in Finland. This Privacy Notice explains how we process personal data relating to the users of the Finnlines Wi-Fi and what rights these users have under applicable data protection laws, including the EU General Data Protection Regulation (2016/679, "**GDPR**").

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) Wi-Fi service provision**

We process personal data relating to the users when they use Finnlines Wi-Fi. The processing of personal data in this case is necessary for the performance of a contract to which the respective user is a party by accepting the Terms of Service and continuing the use of Finnlines Wi-Fi (GDPR Art. 6(1)(b)). This data is processed for the purpose of service maintenance, monitoring and ensuring the appropriate use of the Wi-Fi service.

For this purpose, we process the following personal data:

- Device identification data (such as device name, MAC and IP address and hostname), and
- User data (such as DNS queries and deviations from the acceptable use).

This personal data is strictly required for the provision of Finnlines Wi-Fi.

#### **(2) Service Analytics**

We process data generated by the users when they use Finnlines Wi-Fi, including IP address, device and operating system used, time and duration of visit, navigation details through service and other similar information relating to endpoint. This data is processed in order to analyse how our users use Finnlines Wi-Fi so that we can develop and improve the service.

The legal basis for the processing of personal data in this case is Finnlines' legitimate interest to ensure proper functionality of Finnlines Wi-Fi and to constantly look ways to develop and improve Finnlines Wi-Fi (GDPR 6(1)f).

### 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.

Personal data related to the use of Finnlines Wi-Fi and service analytics will be retained up to 180 days.

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

We collect personal data directly from the users when they use Finnlines Wi-Fi.

#### **5 Data Disclosures**

Personal data may be disclosed to public authorities, such as the police and traffic authorities, when required by law or by authority or court decision.

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 deleted 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 data portability.

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>) and in Sweden the Swedish Authority for Privacy Protection (<https://www.imy.se/en/>).