

PRIVACY NOTICE FOR GATEWAY SERVICE

Finnlines Plc ("**Finnlines**" or "**we**") is committed to protecting the privacy of your personal data. This Privacy Notice is applicable to our Finnlines Gateway application ("**Finnlines Gateway Service**") as well as processing of personal data relating to the users of the Finnlines Gateway 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 Finnlines Gateway 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 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) Gateway Service Provision

We process personal data of the users of Finnlines Gateway Service when they use the Gateway application and when they check-in by using Finnlines Gateway Service. We process personal data also when informing the users for any Service disruption or Service interruption. The processing of personal data is necessary for the performance of a contract to which the user or the business customer (that the user represents) is a party regarding the use of Finnlines Gateway Service. The processing is also necessary for the provision of Finnlines Gateway Service under the said contract (GDPR Art. 6(1)(b)).

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

- Identification data (such as name);
- Contact details (such as address, email address, and phone number);
- Check-in data (such as booking number, shipper ID, voyage data, cargo data and travel documents);
- Customer feedback, when this information is voluntarily provided by the user; and
- Preferred language.

Further, we process location data of the users of Finnlines Gateway Service using GPS data of the user for geofencing feature when the user checks-in to Finnlines' terminal area by using our Gateway Service. The accuracy of the GPS data depends on the user's device. Further, the location data is not stored in Finnlines Gateway Service.

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

(2) Operational efficiency and damage notice handling

We process the personal data, including the GPS data, of the users of the Gateway Service for determining their estimated time of arrival (ETA), when they use the Gateway application to inform us of the start of the transportation of a trailer towards Finnlines' terminal area in Vuosaari port. The personal data is needed for the determination of the estimated time of arrival of the trailer to Finnlines' terminal area for improved efficiency. This processing is needed for provision of more reliable, predictable and in-time maritime transport services for our customers.

Furthermore, we process the personal data, including the GPS data, of the users of the Gateway Service, when they use the Gateway application to send Finnlines a damage notice in a verified manner for any damages to the customer's trailer in Finnlines' possession at Finnlines' terminal area in Vuosaari port. If the Gateway Service is utilised to access Finnlines' terminal area outside the normal service hours of our port service, the user of the Gateway Service must utilise the Gateway application for submitting a damage notice in case of any detected damage to the customer's trailer. The processing is needed for the processing, establishment, exercise, or defense of legal claims towards Finnlines.

The above processing is based on our legitimate interest under Art. 6(1)(f) of the GDPR. For this purpose, we collect and process the following personal data:

- Identification data (such as name);
- Contact details (such as address, email address, and phone number);
- Check-in data (such as booking number, shipper ID, voyage data, cargo data and travel documents);
- GPS data;
- Customer feedback, when this information is voluntarily provided by the user; and
- Preferred language.

The accuracy of the GPS data depends on the user's device. The GPS data is processed to determine the estimated time of arrival of the user to Finnlines' terminal area in Vuosaari port from the start of the delivery, which will be provided by the user via Finnlines Gateway application at the time of his/her choice. Moreover, the GPS data is processed to determine the location of the user within Finnlines' terminal area when the user submits a damage notice to Finnlines before taking delivery of the customer's trailer. Lastly, the location data is not stored in Finnlines Gateway Service.

This information is not mandatory, and the users can object to the processing of personal data.

(3) Gateway Service Analytics

We process data generated by the users when they use Finnlines Gateway Service, including IP address, device and software used, time of login, and other similar information relating to operating system and computer environment when the user logs in to the application. This data is processed in order to analyse how our users use Finnlines Gateway Service so that we can develop, improve and protect the 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 Gateway Service and to constantly look ways to improve and protect Finnlines Gateway Service (GDPR 6(1)f).

This information is necessary to pursue our legitimate interest, but the users can object to the processing.

(4) Other Legal Obligations and Legal Proceedings

When the user uses Finnlines Gateway 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, when disclosure is carried out to facilitate automated check-in in connection with the use of the 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 Finnlines Gateway Service and other requested services will be retained in the operating system of the Service for the duration of the contract with the business customer and two (2) years after the end of the contract.
- Personal data related to Finnlines Gateway 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 two (2) years.
- 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.

4 Regular Sources of Data

We collect personal data directly from the users when they use Finnlines Gateway Service. 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 Finnlines Gateway Service.

5 Data Disclosures

The users may use Finnlines Gateway Service when Finnlines has agreed on the utilisation of the Service with the business customer that the user represents. Personal data of the user is therefore always disclosed to the business customer (that the user represents), which manages the users and their personal data in Finnlines Gateway Service.

Personal data is disclosed to Finnlines' subsidiary Finnsteve Oy Ab, operating Finnlines' terminal area, when it is necessary for the purposes detailed above. 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.

Further, we use third-party ICT service providers for ICT provision, 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.

Any request concerning exercising your rights shall be made to Finnlines' Data Protection Officer by email at the following address: 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 (www.tietosuoja.fi).