October 2026

PASSENGER SERVICES CUSTOMERS AND BUSINESS PARTNERS – PRIVACY NOTICE

Finnlines is committed to protecting your personal data. This Privacy Notice explains how Finnlines collects and uses your personal data when you act as a contact person, employee or representative of our B2B customers, business partners or prospective business partners, such as travel agencies, agents, event organisers, potential customers and other B2B customers or partners. This Notice covers the processing of your personal data in connection with sales and marketing, communications, events and bookings, and the provision and administration of related services. It also explains your rights under applicable data protection laws, including the EU General Data Protection Regulation ("**GDPR**").

This Privacy Notice may be updated from time to time.

1. Contact Information

Controller:
Finnlines Plc
Business ID: FI02011539
Address: Komentosilta 1, 00980 Helsinki, Finland

Contact person:
Päivi Toivanen
Email: paivi.toivanen@finnlines.com

Data Protection Officer:
Jutta Seppänen
Email: dataprivacyofficer@finnlines.com

If you have questions about how we process your personal data or would like to exercise your rights, please contact us by email at: paivi.toivanen@finnlines.com or dataprivacyofficer@finnlines.com.

2. Purposes for Processing Personal Data

We use your personal data to manage and develop our business relationship with you and the organisation you represent. This includes keeping you informed about our services, news, events, business opportunities and other relevant updates, conducting direct marketing and customer surveys, and providing information about products and services that may be of interest to you and your organisation.

Moreover, we use your personal data to work with you and the organisation you represent. This includes inviting you to events and other promotional activities, arranging such promotional events, providing and delivering our services, managing bookings and event arrangements, carrying out activities on behalf of our business partners, handling commission payments, and communicating with you about matters related to our cooperation and agreements.

We may also process your personal data to handle feedback, investigate complaints and to manage claims and other legal matters.

This processing of personal data is based on our legitimate interest to promote, sell and develop our services and business activities, manage our B2B customer and business partner relationships and to make and defend legal claims (Art. 6(1)(f) of the GDPR). We consider this processing to be within your reasonable expectations, as it is necessary for maintaining our business relationship, providing

our services, communicating with you, and handling related business matters. Before relying on legitimate interests, we assess the necessity of the processing and balance our interests against your interests, rights and freedoms.

For this purpose, we process the following personal data:

- Identification and professional data (name, title, employer, language);
- Booking data, when you are traveling with us (gender, date of birth, nationality);
- Contact details (business address, email address, and phone number);
- Customer feedback, when it is voluntarily given;
- Health data (dietary preferences, food allergies, any special needs).

We may process your personal data about food allergies, dietary requirements or accessibility needs that you voluntarily provide and that is necessary for arranging an event or service for you. To the extent that this information constitutes health data, we process it on the basis of your explicit consent (Art. 9(2)(a) of the GDPR).

Additionally, we may ask for your consent to take and use photographs of you in connection with an event. Before requesting your consent, we will explain where and how the photographs may be used. We may separately ask for your consent to include specified personal data, such as your name, title, organisation and contact details, in a participant list shared with other event participants or business partners. This processing is based on your consent (Art. 6(1)(a) of the GDPR).

We may also process your personal data, such as name and contact details, when necessary to comply with legal requirements, such as accounting, tax and regulatory reporting obligations, including those related to commission payments and other business transactions (Art. 6(1)(c) of the GDPR).

You may object at any time to the use of your personal data for direct marketing, and we will stop using your data for that purpose. If certain personal data is necessary to establish or carry out cooperation, enter into an agreement, manage a booking, or provide a requested service or benefit, not providing such data may prevent us from completing the relevant activity.

3. Storage of Personal Data

We retain your personal data only for as long as necessary for the purposes described in this Notice. The applicable retention period depends on the purpose of the processing, the legal basis and any statutory retention requirements. The main retention periods are set out below.

— Personal data related to a customer or business partner relationship will be retained during the relationship and for two (2) years after the end of the calendar year in which the last interaction relating to the relationship took place, unless a longer retention period is required by law or is necessary for the establishment, exercise or defence of legal claims.

— Personal data related to check-in will be deleted within seventy-two (72) hours from the completion of the voyage.

— Health data will be deleted within one (1) month from the event for which the data was collected.

- Personal data processed for direct marketing purposes will be retained for four (4) years from the date of collection or the latest verification or update of your contact details, whichever is later.
- Personal data processed on the basis of your consent, including photographs and participant-list information, will be retained until you withdraw your consent or the data is no longer necessary for the purpose for which the consent was given.

4. Sources of Personal Data

We primarily collect personal data directly from you or from the organisation you represent in connection with our business relationship, communications, events, contract negotiations, and other business interactions. We may also obtain your personal data from other sources, including:

- our business partners;
- companies within Finnlines group;
- publicly available sources, such as company websites, commercial registers, public authority registers, and professional networking platforms; and
- commercial providers of business information and contact data from whom we obtain business contact details and information relating to individuals acting in a professional capacity.

The personal data obtained from these sources may include, for example, your name, employer, title, business address, email address, phone number, and other information related to your professional role and our business relationship with you.

5. Disclosures

We use trusted third-party service providers to support our customer and business partner relationship management, marketing and communications, IT systems and data storage, and the organisation of events and related services.

These providers process personal data on our behalf and follow our instructions. We make sure that all service providers handle your data securely and in line with confidentiality requirements, data processing agreements, and applicable data protection laws.

Personal data may also be disclosed to public authorities when required by law.

We do not transfer your personal data outside the EU/EEA.

6. Security

We process your personal data lawfully, fairly, and transparently. We only collect and use personal data for clear and legitimate purposes explained in this Privacy Notice, and we do not use it for anything incompatible with those purposes.

We take appropriate technical and organisational measures to protect personal data and keep it safe. These safety measures include secure login and authentication to access systems where the personal data is processed or stored, firewalls and network security, and access controls such as personal usernames and passwords, among other suitable security measures.

Only employees who need personal data for their work tasks are allowed to access it. All authorised personnel are required to keep personal data confidential.

7. Your Rights

You have the right to know whether we process your personal data, and to access the data we hold about you.

You can ask us to correct or delete your data, or to limit how we use it, in line with applicable data protection laws. You may also have the right to object to how we use your data or to request that your data be transferred to you or another party. You have the right to object at any time to the use of your personal data for direct marketing. If you object, we will no longer process your personal data for marketing purposes.

If we process your data based on your consent, you can withdraw your consent at any time by contacting us at dataprivacyofficer@finnlines.com. Please note that this will not affect any processing we have already carried out based on your consent before it was withdrawn.

If you would like to exercise your rights, please contact Finnlines' Data Protection Officer at: dataprivacyofficer@finnlines.com.

You also have the right to file a complaint with a supervisory authority if you are unhappy with how we handle your data. In Finland, this authority is the Data Protection Ombudsman (www.tietosuoja.fi/en).