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<p>1 Filing system</p>	<p>Patria Pilot Training student application filing system</p>
<p>2 Controller</p>	<p>Name Patria Oyj</p> <hr/> <p>Address Kaivokatu 10 A FI-00100 Helsinki, Finland</p> <hr/> <p>Other contact information (e.g. telephone during office hours, email address) info@patriagroup.com</p>
<p>3 Data protection officer / contact person in matters relating to the filing system</p>	<p>Name Ville Jaakonsalo</p> <hr/> <p>Address Kaivokatu 10 A FI-00100 Helsinki, Finland</p> <hr/> <p>Other contact information (e.g. email address, telephone during office hours) info@patriagroup.com</p>
<p>4 Purpose of processing personal data, legal basis for processing and information on the source of the personal data</p>	<p>The data in the filing system is processed with the consent of the data subject and as a statutory requirement.</p> <p>The filing system consists of the following personal data subsystems formed for different purposes:</p> <ul style="list-style-type: none"> - <i>Student applications</i> <p>The filing systems contain both public and group-internal information.</p> <p>Purposes for processing personal data, legal basis for processing and data collection:</p> <p>1. <i>Student applications</i></p> <p>Basis for processing: Consent, statutory requirement</p> <p>Purpose of the filing system: Personal data is collected for suitability assessment for training arranged by Patria Pilot Training. The filing system is kept for maintaining applicant data. Only data that is necessary for assessing the qualifications and suitability of candidates for training is collected for the filing system. This is done to ensure the applicant's legal protection during the application process. The legislation concerning flying staff requires the collection of the data collected during the application process.</p> <p>Data collected from: Personal data is only collected from the applicant or a reference designated by the applicant.</p> <p>The personal data in the above-mentioned subsystems is processed on the following legal bases:</p> <ul style="list-style-type: none"> a) processing is necessary for the preparation of performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; and/or b) processing is necessary for compliance with the controller's statutory obligation; and/or

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	<p>c) processing is necessary to establish the controller’s legitimate interests.</p>
<p>5 Description of the categories of data subjects and categories of personal data</p>	<p>The following personal data is collected for this filing system:</p> <p>1. Student applications</p> <p>The data subjects are:</p> <ul style="list-style-type: none"> - Persons applying for training <p>The following information is stored about the data subjects:</p> <p>Patria processes data regarding the student application requested on the application. Some of the information is classified as sensitive (such as information on the applicant’s health and personal identification data) and will be adequately protected by Patria when processing the application.</p> <p>Requested information:</p> <ul style="list-style-type: none"> - Identification data, such as name, address and personal identity code - Educational background: Grades from the diploma from upper secondary school or a vocational school lasting at least three years - Language skills - Health information: Health information is collected because candidates applying for medical certification are required not to have a disease, disability or abnormality which entails a degree of functional incapacity which is likely to interfere with the safe exercise of the privileges of the licence applied for or could render the applicant likely to become suddenly unable to exercise those privileges. - You can read more about the current medical certification requirements on the Traficom website. - Height and weight: The minimum height for candidates selected for traffic pilot trainees is 163 cm, and their physical build must be suitable for operating training aircraft. - Military service: Military service must be completed in accordance with the Conscription Act. We appreciate applicants’ leadership experience and experience in the aviation industry. - Work experience - Any prior flight experience - Free-form “tell us about yourself” section <p>Attachments:</p> <ul style="list-style-type: none"> - Copy of upper secondary school diploma - Copy of matriculation examination certificate - Copy of diploma from a vocational school or university - Copy of military passport and service certificate - Other optional attachment
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<p>Legitimate interests of the controller or a third party</p>	<p>Article 6(1)(f) of the EU General Data Protection Regulation (GDPR) (legitimate interest of the controller) is not applied to the processing of data performed by public authorities in the course of their duties. In this context, Patria can be interpreted as an authority or similar body.</p> <p>The need will be assessed on a case-by-case basis. A balance test will also be carried out if needed.</p>
<p>7 Recipients and disclosure of personal data</p>	<p><i>Personal data will be disclosed to the selection psychologist carrying out the personal evaluation and the persons participating in the interview with the applicant. Within Patria Pilot Training Oy, the data will be processed by individually designated and safety-cleared persons.</i></p> <p>As a broad interpretation of Article 4(9) of the GDPR, the parties (processors/recipients of personal data) to which Patria as a controller transfers personal data for processing (for example, in the context of performing maintenance tasks via a technical interface) are listed below.</p> <p>Access to the personal data in this filing system will be granted to the system supplier (private-sector system supplier(s)) as necessary for investigating any technical hardware or software failure.</p> <p>In addition, personal data in this filing system is disclosed as necessary:</p> <ol style="list-style-type: none"> 1) for executing orders issued by the authorities, to the authority requesting the data; 2) to the suppliers of information systems, tools and equipment required for various tasks and to the suppliers in charge of identity and access management; 3) to suppliers investigating security incidents or nonconformities; 4) to attorneys and law firms providing legal services; 5) courts.
<p>8 Transfer of personal data to a third country or an international organisation</p>	<p>According to Article 45(1) of the GDPR, the transfer of personal data to a third country or an international organisation may take place where the Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection. Such a transfer does not require any specific authorisation.</p> <p>The personal data in Patria's filing system may be transferred outside the EU/ETA on the following conditions:</p> <ul style="list-style-type: none"> - In accordance with Article 46 of the GDPR: transfer of (personal data) subject to appropriate safeguards. Data will not be disclosed outside the EU, European Economic Area or countries decided by the Commission to provide an adequate level of protection unless an adequate level of protection is ensured through contracts or otherwise as required by law.
<p>9 Data retention period</p>	

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	<p>Data collected for Patria's personal data filing systems will only be stored for as long as and to the extent necessary in relation to the original and compatible purposes for which the personal data was collected.</p> <p>Personal data will be deleted from the filing system as follows:</p> <p>1. Student applications</p> <p>The retention period for applications depends on whether the candidate is selected for the training programme. Applications from candidates who are not selected will be destroyed within two weeks from notifying the applicant of their rejection. The applications of candidates selected for training are retained for three (3) years from the end of the training period in accordance with Traficom's requirements.</p> <p>The selection psychologist will retain the applications and test results of the tested applicants for two (2) years.</p>
<p>10 Principles of data protection; description of technical and organisational security measures</p>	<p>Personal data will remain confidential. Patria Oyj's data network or server environment or the cloud services in which the filing systems are located are protected by the necessary technical and organisational measures.</p>
<p>11 Rights of the data subject</p>	<p>Data subjects have right of access to any personal data stored on them in the filing systems. According to the GDPR, the controller must reply to the data subject's request to exercise their rights within one month of receipt of the request. Requests for access to personal data are free of charge, but Patria reserves the right to reject excessively frequent, extensive or clearly unfounded requests.</p> <p>A. Right of access to personal data</p> <p>Data subjects have right of access to any personal data stored on them in Patria's personal data filing system. The request to access or rectify personal data should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when requesting access or rectification.</p> <p>Opening hours: Mon–Fri from 8 a.m. to 4 p.m.</p> <p>B. Right to rectification and restriction of processing</p> <p>Data subjects have the right to require the controller to rectify inaccurate and incorrect personal data concerning them.</p> <p>Data subjects have the right to restrict processing by Patria as the controller of this filing system where one of the following applies:</p> <ul style="list-style-type: none"> - the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; - the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;

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	<ul style="list-style-type: none"> - the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims; - the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject. <p>The request to rectify or restrict the processing of personal data in Patria's filing system should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when making the request for rectification or restriction.</p> <p>C. Right to erasure</p> <p>Data subjects have the right to have the personal data concerning them erased from Patria's filing system without undue delay where one of the following grounds applies:</p> <ul style="list-style-type: none"> - the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; - the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing; - the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); - the personal data has been unlawfully processed; - the personal data has to be erased to comply with a legal obligation in Union or national law. <p>The request to erase personal data should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when requesting access or rectification.</p> <p>D. Requests for access or other requests from outside Finland</p> <p>Requests for access, requests for rectification or restriction of personal data, and requests for erasing personal data from outside Finland should be sent to info@patriagroup.com. Upon receiving the request, we will agree how and where the identity of the person can be verified to initiate the process related to the request.</p>
<p>12 Right to object</p>	<p>According to Article 21 of the GDPR, data subjects have the right to object, on grounds relating to their particular situation, to the processing of personal data concerning them which is based on Article 6(1)(e) (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller), including profiling based on those provisions. The controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</p>

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	<p>The processing objection request should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when requesting access or rectification.</p>
13 Data portability	<p>Once the data subject has provided Patria with the personal data concerning them in a structured, commonly used and machine-readable format, they have the right to have that data transmitted to another controller when:</p> <ul style="list-style-type: none">a) the processing is based on the data subject's consent or on a contract between the controller and data subject; andb) the processing is carried out by automated means; andc) the transfer is technically feasible.
14 Right to withdraw consent	<p>The applicant may withdraw from the application procedure and request the deletion of their personal data at any time. The data will be deleted without delay unless Patria has a legal basis for continuing the processing of the data, such as a statutory obligation to retain the data, or if it needs to be retained due to legal claims.</p> <p>The applicant's personal data will be erased from Patria's systems when the applicant announces their withdrawal from the application procedure or, at the latest, at the same time as the applications of the rejected applicants are deleted within two weeks of the end of the selection process. When withdrawing from the application procedure, applicants can delete their data themselves from the Laura system.</p> <p>Otherwise, the request to erase personal data should be made in accordance with section 11 Rights of the data subject in this Privacy Notice.</p>
15 Right to complain to the supervisory authority	<p>Data subjects have the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data concerning them infringes the applicable data protection regulations. The national supervisory authority in Finland is the Office of the Data Protection Ombudsman; contact details:</p> <p>Office of the Data Protection Ombudsman Visiting address: Ratapihantie 9, 6th floor FI-00520 Helsinki, Finland</p> <p>Postal address: P.O. Box 800 FI-00521 Helsinki, Finland</p> <p>Telephone (switchboard): + 358 29 56 66700 Fax: +358 9 56 66735 Email: tietosuoja@om.fi</p>
16 Automated decision-making and profiling	<p>The personal data in the filing system will not be used for automated decision-making or profiling.</p>
17 Additional information	



PRIVACY NOTICE

EU General Data Protection Regulation (GDPR)
(679/2016), Articles 12–14 and Data Protection Act
(1050/2018)

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	We reserve the right to amend this Privacy Notice. The up-to-date Privacy Notice is available from Patria's instruction system or, upon request, at info@patriagroup.com .
18 Updates	The document was last updated on 30 September 2020
19 Appendices	