



Privacy Notice – Stora Enso’s Misconduct Reporting

24.2.2021

1 Purpose

In Stora Enso transparent and honest working environment is promoted. Employees and other stakeholders are encouraged to report suspected violations or other kind of misconducts to strengthen the prevention, detection and resolution of any unlawful or unethical behaviour. All reported suspected misconducts or violations are taken very seriously.

This Notice provides employees including consultants, temporary and voluntary staff and the Board of Directors, customers, suppliers and other stakeholders of Stora Enso and its affiliates with information about the processing of the personal data in relation to the misconduct reports and investigation process. This Notice gives a general description of personal data processing from the initial reporting until the outcome of the investigation. However, individual situations in which personal data is being processed may vary. Thus, all information provided in this Privacy Notice may not be applicable in each different situations and further information may be provided directly to the persons affected in connection with the collection of personal data and during the process. If you wish to have more detailed information in relation to how your personal data is being processed, you should contact Stora Enso’s Compliance Investigation Group or use the contact information provided in section 2 of this Privacy Notice.

2 Data Controller

Stora Enso Oyj and its subsidiaries are joint data controllers in respect of the personal data which they jointly process and share. Stora Enso Oyj and its subsidiaries share the data controller’s obligations and responsibilities between each other as they deem appropriate based on the relevant circumstances. In general, Stora Enso Oyj is responsible for (i) the functionality and security of the IT systems, (ii) data privacy and IT policies, guidelines and instructions for the group, and (iii) that global personal data systems and registers are compliant with applicable privacy laws, while the subsidiaries for their part are responsible for (i) the validity, accuracy and completeness of the personal data within the systems, and (ii) ensuring that local personal data registers, systems and processes are in compliance with applicable local and EU laws. More information on Stora Enso’s subsidiaries and jointly controlling entities can be found [here](#).

Regardless of the relevant data controller in each situation, you can always use you rights by contacting Stora Enso Oyj:

Address:

Stora Enso Oyj
Kanavaranta 1
P.O. Box 309
FI-00101 Helsinki
Finland

Email:

data.privacy@storaenso.com

Telephone:
+358 2046 131

- 3**
Legal basis and Purposes of Personal Data Processing
- Reports on suspected violations or misconducts infringing any legal requirements such as financial crimes related to accounting, internal accounting controls, auditing, bribery, money laundering, securities market, fraud, theft, embezzlement, corruption; conflict of interest; serious forms of harassment or discrimination and improper workplace conduct; threat to health and safety of employees, visitors and workplace; and violations of the Stora Enso Code by employees and Supplier Code of Conduct by Stora Enso's suppliers or business partners are investigated carefully.
- Processing of personal data related to reports submitted through the misconduct reporting tool and other channels and to investigations are based on the obligations from applicable laws that require Stora Enso to have established internal control and investigation procedures and a dedicated channel to report suspected misconducts and violations. Additionally, there is also Stora Enso's legitimate interest relating to the investigations of the alleged misconducts and violations, safeguarding an effectual implementation of Stora Enso Code and related policies and guidelines and conducting business in accordance with its values, ethical guidelines and legal requirements. In principle, we do not request or process any special category of data, such as health, religious or ethnic information, but if the processing in relation to the report disclosed by you contains any such data, the data is processed on the lawful basis of consent of the individual affected or for establishing, exercising or defending a legal claim.
- 4**
Content of the Register
- Stora Enso may collect and process the following personal data about the reporting person(s), reported person(s) and other persons affected (witnesses and other individuals directly linked to the case):
- Person's basic data, including: name, contact information and professional information;
 - Data related investigation, including: any information provided by the reporting person and collected during the investigation; description of suspected misconduct or violation; analyses related to the investigation;
 - Outcome of the investigation.
- The personal data collected and processed will be restricted to the minimum that is necessary to ensure a fair and complete assessment and resolution of the suspected misconduct or violation.
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Regular sources of Information
- Personal data is collected from the person(s) reporting the alleged misconduct or violation. Persons may report through a system provided by an external service provider or use any of the internal channels for such reporting. Additionally, further personal data is collected from the reported person(s) and from other persons involved in the investigation. Additional information may be retrieved from Stora Enso's relevant IT systems.

**6
Data
Retention**

Stora Enso manages the personal data in the reporting tool and in the investigation reports and regularly deletes personal data there. After the termination of an investigation, Stora Enso passively retains personal data for pre-defined time periods based on the legislative requirements and Stora Enso's genuine needs in accordance with Stora Enso's internal guidelines. For more information regarding the retention times, please contact Stora Enso in accordance with section 11.

**7
Regular Data
Disclosures**

Reports of alleged misconducts and violations are collected and managed by the Stora Enso Compliance Investigation Group for the purposes of investigations and any follow-on action. The data shall not be disclosed to any other parties, unless required for the investigation or follow-on actions with a legitimate need to know and in accordance with Stora Enso's Compliance investigation procedure and guideline.

Personal data may be disclosed to companies within the Stora Enso group for purposes compatible with the processing purposes defined in Section 3 of this Privacy Notice.

Stora Enso may use external law firms to support and conduct the investigations. Personal data may also need to be disclosed to the competent authorities due to legal requirements or in relation to legal proceedings. Data accessed by these third parties is limited to the purposes outlined above. In addition, the on-line misconduct reporting tool is provided and maintained by an external service provider.

Stora Enso will not disclose your personal data in any other circumstances without your consent.

**8
Data
Transfers
from EU/EEA**

Some of the Stora Enso entities that may be part of the investigation are located outside of European Union and/or European Economic Area. In some cases, the relevant competent authorities, service suppliers and advisors may be located outside the EEA. In such situations, Stora Enso ensures that sufficient level of data protection is maintained with appropriate safeguards, e.g. by signing the EU Commission's model clauses with the party receiving the data. However, the necessity to transfer any personal data is always carefully considered. Stora Enso group's internal data transfers are governed with a contractual framework based on the EU Commission's model clauses.

For more information regarding transfer of personal data to such third countries, please contact Stora Enso in accordance with section 11.

**9
Data Security**

All reported matters are processed as confidential and only the members of the Compliance Investigation Group can access the report. If necessary for the investigation, other specifically named persons (internal or external), who have a valid need to know, can be consulted and information shared with them. All members of the Compliance Investigation Group as well as other persons (internal or external) who case specifically have access to information in the report are bound by a confidentiality obligation set via a confidentiality agreement.

It is possible to file a report anonymously, however, Stora Enso always encourages to file the report by providing the name and contact details. When a report is filed with contact details, it facilitates further handling of the matter and possible subsequent investigations. In case the report is filed anonymously Stora Enso or the service provider cannot identify the reporter or in any way track the report. It is, however, possible for the Compliance Investigation Group to anonymously communicate with the reporter through the system.

Personal data in reporting channel, Stora Enso's IT systems and information recorded during the investigation process are protected against an unauthorized access with various information security measures. Entering the systems and access to personal data are granted only to persons who need the access in order to fulfil the tasks and duties relating to their role within Stora Enso.

Additionally, Stora Enso and its service providers are actively monitoring the confidentiality, integrity and availability of the IT environment and have implemented technical measures to prevent and detect incidents that may threaten any personal data.

The security of personal data is also ensured when transferring or disclosing the data internally or to other parties. The measures employed vary based on the sensitivity of the data and includes e.g. identification of authorized recipients and encryption.

10 Your Rights

Access to information

You are entitled to obtain information on the personal data concerning you which Stora Enso is processing and to obtain a copy of such personal data. You are kindly asked to use the template provided on this [Privacy](#) site for such requests. The filled-out form or a request including similar information may be then presented to Stora Enso in accordance with section 11 of this Privacy Notice.

Right to rectification, erasure and restriction

You are entitled to have any personal data that is inaccurate, outdated, unnecessary or contrary to the purposes of data processing corrected or erased. You are kindly asked to use the template provided on this [Privacy](#) site for such requests. Requests concerning rectification and erasure may be presented in accordance with the instructions in section 11 of this Privacy Notice.

You are also entitled to have Stora Enso restrict the processing of your personal data for example when you are waiting for Stora Enso's answer to your access or erasure request.

Right to object to processing

On grounds relating to your particular situation, you are entitled to object to the processing of personal data concerning you, provided that the processing is based on Stora Enso's legitimate interest.

You are kindly asked to use the template provided on this [Privacy](#) site for such requests and present them in accordance with the instructions in section 11 of this Privacy Notice. In this request, you shall define the particular situation based on which you are objecting to the data processing. Stora Enso may decline the request on statutory grounds.

Data Portability

You are entitled to receive an electronic copy of the personal data that has been provided by you for the purposes of performing the contract made between you and Stora Enso or where the processing is based on consent. Furthermore, the data may be transmitted directly to another data controller on your request, if this is technically feasible.

Right to withdraw consent

If the processing of your personal data is based on consent, you have the right to withdraw your consent any time.

Right to lodge a complaint

You are entitled to lodge a complaint with a competent data protection authority regarding the Stora Enso's processing of personal data.

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Contacting the Data Controller

In all questions and matters relating to your personal data processing or rights, you should contact the Stora Enso. You may use your rights by sending an e-mail to data.privacy@storaenso.com.

Stora Enso is entitled to decline requests on statutory grounds. Stora Enso shall inform you of such a decline including the grounds for the decline.