



## Privacy Notice – Stora Enso’s Customer and Sales Register

### 1

#### **Purpose**

The purpose of this Privacy Notice is to provide the persons communicating with Stora Enso or that are otherwise registered in Stora Enso’s personal data register in the role of a customer or potential customer (or as a representative of the foregoing) information about Stora Enso’s processing of their personal data. This Privacy Notice gives a general understanding of such personal data processing. However, the individual situations in which personal data is being processed may vary. Thus, all the information provided in this Privacy Notice may not be applicable to each different data processing situations and further information may be provided directly to the data subject in connection with the collection of the data subject’s personal data. If a person wishes to have more detailed information in relation to how his/her personal data is being processed, the person should contact his/her own contact person in Stora Enso 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 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. Please review the list of [Jointly Controlling Entities](#) under the GDPR for further guidance on which Stora Enso entity is controlling the processing of the personal data.

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

**Address:**

Data Privacy/Stora Enso Oyj  
IT and Digitalisation  
Imatra Mills  
55800 IMATRA  
Finland

**Email:**

[data.privacy@storaenso.com](mailto:data.privacy@storaenso.com)

**Telephone:**

+358 2046 111

3

**Name of the  
Personal Data  
Register**

**Stora Enso's Customer and Sales Register**

4

**Lawfulness  
and Purposes  
of Personal  
Data  
Processing**

The legal grounds for processing personal data are either fulfilment of an agreement concluded between a Stora Enso group company and the data subject or the legitimate interest of the data controller. Such legitimate interests consist in establishing, managing and developing Stora Enso's customer relationships (including concluding agreements with organisations that data subjects are representing), business functions and communications. In certain cases, Stora Enso has a legal requirement to collect certain information of its customers and their representatives. These situations relate e.g. to anti-money laundering and counter terrorism regulation, market abuse regulation and auditing. In some instances, Stora Enso may need to process personal data in order to ensure the security and functionality of the Stora Enso IT systems.

In limited cases (usually when required by local laws), Stora Enso may need to request consent for certain specific data collection or processing. Such consent can be at any time cancelled by the data subject by using technological means or contacting Stora Enso in accordance with section 12.

Providing certain personal data to Stora Enso is necessary in order for Stora Enso to be able to conclude an agreement with the data subject or the organisation data which the subject is representing. If the data subject refuses to give this personal data, Stora Enso may not be able to establish or continue the business relationship.

Maintaining a customer and sales register is necessary for Stora Enso to enable efficient and customer-oriented marketing, sales activities and delivery management as well as to establish and maintain good customer relationships. The customer and sales register is

used also for more general communications purposes that do not directly relate to sales promotion.

Stora Enso may use customer related personal data also to improve customer experiences and to develop products and services by analysing the customer's interests. Data aggregated through customer communications and other customer interactions may be used to evaluate needs for customer satisfaction and sales interest related actions. This may include targeting of marketing, satisfaction surveys and as well as sales related communications.

Stora Enso may group customers into certain segments based on the data collected. This allows Stora Enso to better target services, feedback questionnaires, marketing and other forms of communication. For example, when visiting Stora Enso's website, depending on what type of cookies the data subject has allowed in his/her browser settings, Stora Enso may target specific content that is not automatically visible to some other users of the website. Please see our website privacy and cookie policy available at <http://www.storaenso.com/privacy> for further information about Stora Enso's use of cookies.

Customer categorization might partly be based on automated decision-making. However, Stora Enso never uses data subject's personal data for automated decision-making that could produce legal effects concerning the data subject or similarly significantly affect the data subject.

Segmentation takes place at a very general level and Stora Enso always ensures that it is based on substantive criteria that are not discriminatory. Stora Enso never uses the whole customer profile for segmentation.

Certain data processing activities may be outsourced to carefully selected third party service providers in which case such third-party processors operate on behalf of the data controller under a specific data processing agreement.

## 5

### **Content of the Register**

In many cases the customers of the Stora Enso group are legal entities and not natural persons. However, in order to establish and maintain a customer relationship, processing of the personal data of the natural persons representing and working for the customer companies and other legal entities is inevitable. Stora Enso may also collect personal data of prospective customer's representatives. Persons may be included in Stora Enso's customer and sales register in their private capacity when the business or other relationship (e.g. subscription to Stora Enso's newsletters and other communication materials and reports) is formed directly between the individual and Stora Enso.

The personal data Stora Enso may collect and process within the register includes the following personal data categories:

- 1) Contact information, including name, job title, e-mail address, phone number, address and preferred contact language
- 2) Other necessary identification data such as ID number and birthdate
- 3) Contact information belonging to a company's/organisation's representative
- 4) User and identification information related to online tools and services
- 5) Marketing and communications information, e.g. campaign and other communications material delivery history, interests and activities and time zone.
- 6) Information if the data subject does not want to receive marketing messages or other communications
- 7) Information relating to sales projects, opportunities, customer visits and lead sources the data subject is connected with as well as other project data and historical project information (including successful and unsuccessful projects)
- 8) Customer feedback and interview records as well as compliance breach notices received from customers
- 9) Event related information, such as rsvp data, diet related information and attendance confirmation
- 10) Sanctions screening data (as required and allowed by national laws)

- 11) Location data collected from customer's mobile devices or otherwise, however after taking care of necessary directions, receiving a request or data subject's consent for this, as required by the applicable laws.

The register may also contain some other similar and relevant contact and business information for the purposes of managing customer relationship as described in section 4.

Stora Enso does not collect data relating to sex life or sexual orientation, race, disability, ethnic or social origin, genetic or other biometric features, religion or belief, political or economic or societal opinion (notwithstanding situations where such information is related to the persons societal or economic public role and the information can be regarded as public by the respective individual himself/herself) or membership of a national minority, unless this is required by law or necessary in order to fulfil a legal obligation Stora Enso is subject to.

Furthermore, Stora Enso does not intentionally collect data relating to a data subject's health, however in some rare cases such information may be inferred from the diet information a person has given in connection with an event registration.

Stora Enso takes into account applicable local legislation when collecting personal data and ensures that personal data is always limited to information necessary for the said purposes as described in section 4. Thus, e.g. the data collected of a newsletter subscriber differs from the data collected of a long time representative of an established Stora Enso customer.

## 6

### **Regular sources of Information**

Personal data is primarily collected from the data subjects themselves or aggregated through the communications and other co-operation Stora Enso has with the data subject.

Another typical source of information are the companies and other legal entities the data subject represents as well as the web pages of these entities. Stora Enso may collect personal data also from other reliable public sources or third parties, such as trade registers.

## 7

### **Data Retention**

Stora Enso manages the personal data within the customer and sales register and regularly deletes and corrects unnecessary and outdated data when the customer relationship or other communications between the data subject and Stora Enso are active. After the relationship between the data subject and Stora Enso becomes passive, Stora Enso retains the personal data for pre-defined time periods. These time periods have been defined based on Stora Enso's genuine needs and the legislative requirements Stora Enso is subject to. As a ground rule, personal data that is not subject to any statutory retention requirements shall be deleted from the customer and sales register managed within the European Union after five years of passive retention when the customer or other relationship between Stora Enso and the data subject has ended. For more information regarding the retention times, please contact Stora Enso in accordance with section 12.

## 8

### **Regular Data Disclosure**

Personal data from the customer and sales registers is disclosed to Stora Enso's auditors, insurance companies and different governmental authorities/agencies (or similar) for the purposes of their regulatory tasks. Stora Enso may also disclose personal data from the customer and sales registers to factors (such as banks) in connection with Stora Enso's factoring arrangements regarding customer receivables. Personal data may be also disclosed to other companies within Stora Enso company group for purposes compatible with the processing purposes defined in Section 5 of this Privacy Notice.

9

**Data Transfers from EU/EEA**

Some of the entities who receive personal data from Stora Enso or to whom Stora Enso has outsourced personal data processing functions are located outside of European Union and/or European Economic Area. The locations of these entities include Europe, North America, South America and Asia. In such situations, the data controller 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. The 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 12.

10

**Data Security**

Personal data in Stora Enso's IT systems are protected against unauthorized access with various information security measures. Each user has a personal user ID and password for entering the systems and access to personal data is 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 to other processors. The measures employed vary based on the sensitivity of the data and includes e.g. identification of authorized recipients and encryption.

11

**Data Subject's Rights**

Please note that the following rights primarily are enforced in situations where European Union data protection legislation applies.

Access to information

A data subject is entitled to obtain information on the personal data concerning him/her which Stora Enso is processing and to obtain a copy of such personal data. Data subjects 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 12 of this Privacy Notice.

Right to rectification, erasure and restriction

A data subject is entitled to have any personal data that is inaccurate, outdated, unnecessary or contrary to the purposes of data processing corrected or erased. Data subjects 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 12 of this Privacy Notice.

A data subject is also entitled to have the data controller restrict the processing of the data subject's personal data for example when the data subject is waiting for the data controller's answer to the data subject's access or erasure request.

Right to object to processing

On grounds relating to his/her particular situation, a data subject is entitled to object to the processing of personal data concerning him/her, provided that the processing is based on the data controller's legitimate interest.

Data subjects 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 12 of this Privacy Notice. In this request, the data subject shall define the particular situation based on which the data subject is objecting to the data processing. Stora Enso may decline the request on statutory grounds.

Data Portability

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

Right to lodge a complaint

A data subject is entitled to lodge a complaint with a competent data protection authority regarding the data controller's processing of personal data.

**12**

**Contacting the Data Controller**

In all questions and matters relating to personal data processing or rights of the data subject, data subjects should contact the data controller. Data subjects may use their rights by sending an e-mail to [data.privacy@storaenso.com](mailto:data.privacy@storaenso.com).

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

**Change summary**

Version 1.0	22.5.2018