

Privacy Notice – Stora Enso’s forest owner and private customer register

1

Purpose

The purpose of this Privacy Notice is to provide you, the data subject as specified in data protection legislation, with information on how Stora Enso is processing your personal data. Please read this Privacy Notice carefully before submitting your personal data to Stora Enso. Protecting your privacy and personal data is of the utmost importance to Stora Enso, and we will be happy to help you with any issues regarding the protection of your data and exercising of your rights. Do not hesitate to contact us here at Stora Enso if you should have any questions about the contents of this Privacy Notice or other issues involving the processing of your personal data. See section 2 for contact information "Data controller"

2

Data Controller

Stora Enso Oyj and its subsidiaries are joint data controllers in respect of the personal data 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 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, data subjects may always use their rights by contacting Stora Enso Oyj using the following contact information:

Address:

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

Email:

data.privacy@storaenso.com

Telephone:

+358 2046 111

3

**Name of the
personal data
file**

Stora Enso forest owner and private customer register

4

**Lawfulness and
Purposes of
Personal Data
Processing**

The legal grounds for collecting and processing your personal data are usually fulfilment of agreements concluded between you and Stora Enso group company. Such agreements are made when, for example, you register as a user of our online services, you order a product from our web shop, or you sign a timber trade agreement.

Providing of certain personal data to Stora Enso is necessary in order to enter into an agreement with Stora Enso. If you refuse to submit this personal data to Stora Enso, we may not be able to establish or continue the business relationship with you.

Stora Enso may also process your data on the basis of the legitimate interest. Such legitimate interests exist when Stora Enso has valid grounds to collect or process data for the purpose of conducting business, maintaining and developing customer relationships, or if Stora Enso wants to provide you with information that might be of interest to you or on other topical subjects. Legitimate interest also serves as a basis for when we collect personal data on forest property shareholders other than those party to a timber trade agreement. In some instances, legitimate interest pertains to ensuring the security and functionality of the Stora Enso IT systems.

In certain cases, Stora Enso is subject to legal obligations, whose fulfilment requires the collection and storage of personal data. For example, documents concerning various sales transactions must be stored to fulfil the accounting obligations.

We may need to request your consent to process your data if national legislation expressly requires your consent or if Stora Enso does not have any other grounds for processing your data. A typical situation for requesting consent is, for example, gaining permission to send email marketing materials. You may cancel such consent at any time. In many cases, consent can be revoked through a user account in our online services or by following the instructions given at the bottom of an email message sent by Stora Enso. You may also revoke your consent by contacting Stora Enso in accordance with section 12 below.

Maintaining a forest owner and private customer register is necessary for Stora Enso to provide you the service or product upon which we have agreed or otherwise to ensure that our agreement is properly fulfilled. The register is also needed more broadly for the management of effective and customer-oriented marketing, communications and sales activities, customer relations and satisfaction and deliveries. The register is also used for more general communications purposes and reporting.

Stora Enso may use this data to improve the customer experiences and develop services and service channels. Data aggregated through the customer relationship may be used to evaluate needs for customer satisfaction and sales related measures of our various customers. When we use your data for this type of general business development, we make every effort to use data in such a way that you will not be immediately identifiable.

Stora Enso has many legal obligations, whose fulfilment requires the collection of personal data. Such obligations relate to tax, accounting and auditing obligations, anti-money laundering and counter terrorism regulation and market abuse regulation. In some instances, Stora Enso may also need to process personal data in order to ensure the functionality and information security of Stora Enso IT systems.

Certain data processing activities may be outsourced to carefully selected third party service providers to support Stora Enso's internal operations. In such situations, we ensure the data protection with the appropriate contractual arrangements. As a rule, we only transfer data to these parties for the purpose of providing Stora Enso services and do not permit these parties to process your data for any other purposes.

We may group our customers into certain segments based on the data collected. This allows us to better target services, feedback questionnaires, events, marketing and other forms of communication to you.

For example, when you visit our website, depending on what type of cookies you have consented to in your browser settings, we can target specific content that is

not automatically visible to some other website users. This targeting is based on your previous visits to the Stora Enso website and possibly also to other websites. For additional information on the use of Stora Enso cookies, visit the Stora Enso website.

Customer categorisation might partly be based on the automated decision-making. However, we never use your personal data for any automated decision-making that could produce legal effects concerning you or similarly significantly affect you.

Segmentation is done at a very general level and we always ensure that it is based on the substantive criteria that are not discriminatory. Furthermore, your personal data is used only to a very limited extent for segmentation. We never use your entire customer profile for segmentation purposes.

5

Content of the Register

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

- 1) Contact information, including name, address, email address, phone number and preferred contact language
- 2) Other necessary identification data, such as a national identifier (social security number) or date of birth
- 3) User and authentication information related to online tools and services
- 4) Any other additional data required for effective customer management, such as the cadastral register number and land ownership data.
- 5) Marketing and other communications information, such as campaign and communications material delivery history, interests
- 6) Information if the data subject does not want to receive marketing messages or other communications, channel preferences and bans
- 7) Information relating to sales projects, opportunities, and negotiations as well as to previous agreements and negotiations
- 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 law)
- 11) Data related to the device used by the customer and browsing data, however only to the extent the customer has consented to the use of cookies or the collection of said data on their web browser or in the settings of their device.

The register may also contain other similar and relevant data that, for example, you submit to Stora Enso.

Stora Enso does not collect data relating to a person's sex life or sexual orientation, disability, race, ethnic or social origin, religion or beliefs, political or

societal opinion (notwithstanding situations where such information is related to the person's societal or economic public role and the information can be regarded as public by the respective individual themselves) or membership of a national minority, unless this is required by law or necessary to fulfil a legal obligation that 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 provided to Stora Enso in connection with an event registration.

Stora Enso takes into account applicable local legislation when processing personal data and ensures that personal data is always limited to information necessary for the said purposes as described in section 4. Thus, the data we have collected from you depends on your relationship with Stora Enso.

6

Regular Sources of Information

Personal data is primarily collected from you or aggregated through the communication and other co-operation you engage in with Stora Enso. In addition, we also use various public sources of information, such as the Finnish Forest Centre, National Land Survey of Finland and Population Register Centre. In some cases, we obtain your data through another service to which you originally provided your data. In these cases, we make every effort to ensure that our partners from which we have received the data has taken sufficient measures to ensure the protection of your data and exercising of your rights.

7

Data Retention

Stora Enso regularly maintains, corrects and deletes unnecessary and outdated personal data when your customer relationship or other communications with Stora Enso is active. After your relationship with Stora Enso becomes passive, Stora Enso will still retain your personal data for pre-defined time periods. These time periods have been defined based on Stora Enso's genuine needs and 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 after five years of passive retention, when the customer or other relationship between you and Stora Enso has ended. For more information regarding the retention times of your personal data, please contact Stora Enso using the contact information listed in section 2.

8

Regular Data Disclosure

Personal data from the Stora Enso forest owner and private customer register is disclosed to auditors, insurance companies and various governmental authorities/agencies (or similar) for the purpose of their regulatory tasks. Personal data may be also disclosed to banks in connection with business activities.

General data that may contain information classified as personal data, such as the cadastral register number, may be disclosed to various forestry associations as well as for research purposes. Your contact information may also be disclosed to parties that provide services on behalf of Stora Enso e.g. in connection with events, mailings and marketing.

Your data may be disclosed to other companies within the Stora Enso group for purposes specified in section 4 of this Privacy Notice.

9

Data Transfers from EU/EEA

Some of the entities which receive personal data from Stora Enso or which participate in the processing of personal data together with Stora Enso on the basis of an agreement are located outside of the 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 a sufficient level of data protection is maintained with appropriate safeguards, e.g. by signing the EU Commission's model clauses. 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 2.

10

Data Security

Personal data in Stora Enso's IT systems are protected against unauthorised access with various information security measures. Each user has a personal user ID and password for entering the IT systems and access to personal data is granted only to persons who need the access to fulfil the tasks and duties relating to their role within Stora Enso.

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 threaten any personal data.

The security of personal data is also ensured when transferring or disclosing data to other processors. The measures employed vary based on the sensitivity of the data and may include, for example, the identification of authorized recipients and encryption.

Your rights in the processing of personal data

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

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 12 of this Privacy Notice.

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 the legitimate interest of Stora Enso. 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 12 of this Privacy Notice. If you would like to object to the processing of your personal data for such particular situation, you are kindly asked to explain the particular situation when submitting a request to Stora Enso.

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 also entitled to demand that Stora Enso restrict the processing of your personal data, for example, when you are waiting for the decision on your request to access or erase your 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 12 of this Privacy Notice.

Data portability

You are entitled to receive an electronic copy of the personal data that you have directly provided for the purposes of performing the contract made between you and Stora Enso or where the processing is based on your 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

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

12

Contacting the Data Controller

In all questions and matters involving personal data processing or rights of the data subject, you should contact the data controller. You may use your rights by submitting an email to data.privacy@storaenso.com.

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

Change summary

Version 1.0	22.5.2018