

Privacy Notice – Stora Enso forest owner and private customer register

18.11.2020

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Purpose

The purpose of this privacy policy is to provide you, the data subject as specified in data protection legislation, with information on how Stora Enso, as the data controller, will process your personal data. Please read this privacy policy 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 involving the protection of your data and exercising of your rights. So, do not hesitate to contact us if you should have any questions regarding the contents of this privacy notice or other issues involving the processing of your personal data. See section 2 for contact information "Data controller".

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Data controller

Stora Enso Oyj and its subsidiaries are joint data controllers with respect to the personal data they jointly process and share. Stora Enso Oyj and its subsidiaries share the data controller's obligations and responsibilities to the extent they deem appropriate under the given circumstances. As a rule, Stora Enso Oyj is responsible for: (i) the functionality and security of IT systems; (ii) Group privacy and IT policies, guidelines and instructions; and (iii) ensuring that global personal data registers are compliant with applicable privacy legislation; while subsidiaries are, for their part, 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. Further information on the subsidiaries can be found [here](#).

Regardless of which entity serves as data controller in a given situation, data subjects may always exercise their rights by contacting Stora Enso Oyj using the following contact information:

Address:

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

Email:

data.privacy@storaenso.com

Telephone:

+358 20 46 131

3**Lawful grounds for and purpose of processing personal data**

The lawful grounds for collecting and using your personal data are usually to fulfil an agreement made between you and Stora Enso. 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 negotiate or sign a timber sales agreement. The submission of certain personal data to Stora Enso is necessary in order to enter into an agreement with Stora Enso. If you refuse to submit data to Stora Enso, we will not necessarily be able to establish or continue a contractual relationship with you.

Stora Enso may also process your data on the basis of 'legitimate interest'. Such a legitimate interest exists when Stora Enso has a valid reason to collect or use data for the purpose of conducting business, maintaining customer relationships and development, 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 data on forest holding shareholders other than those party to a timber sales agreement. Stora Enso also collects your data when you visit our places of business or sites to ensure and improve workplace safety and to prevent malpractices. In certain situations, legitimate interest pertains to ensuring the proper function of Stora Enso's IT systems and data protection.

Stora Enso is also subject to multiple legal obligations of which fulfilment requires the collection and storage of personal data. Such obligations include tax, accounting, timber origin tracing and auditing obligations, measures to combat money laundering and terrorism and measures to prevent market abuse.

We may need to separately request your consent to process your data if the legislation expressly requires requesting 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 and to use cookies on web pages. You have the right to revoke your consent at any time. In many cases, consent can be revoked through a user account in one of 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 11 below.

Maintaining the forest owner and private customer register data is therefore necessary for providing the service or product upon which we have agreed or otherwise ensuring that the agreement is properly fulfilled. The register is also needed more broadly for improving effective marketing, new customer acquisition, communications and sales operations, customer relations, customer satisfaction and experience; for developing services and service channels; and for enabling delivery management. The register is also used for information, statistics and reporting. We use data collected in the customer relationship to determine more specifically what customer satisfaction and sales related measures should be targeted at 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.

We may group our customers into certain segments based on the data we have collected on them and on data available from public sources. Segmentation is done in a very general manner and we always ensure that it is based on the appropriate criteria, without being discriminatory. Furthermore, your personal data is used only to a very limited extent in segmentation. We would never use your entire customer profile for segmentation purposes. This grouping makes it possible for us to more effectively target service content, feedback surveys, events, marketing, loyalty programs and other communications to you. For example, when you visit our website, depending on what cookies you have consented to in your browser settings, we can target you with certain content, which is not automatically visible to another website user. 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 grouping can, to a certain extent, be based on the automatic processing of your personal data. However, we do not use your data for any automatic decision-making that would result in undesirable legal or similar consequences.

We may record your phone calls to improve our services and to ensure quality. We will always inform you about using the recording.

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Content of the Register

Stora Enso may collect the following data as part of the forest owner and private customer register:

- 1) Contact data, including name, address, email address, phone number and language choice
- 2) Other necessary identification data, such as a national identifier (social security number), a date of birth, a business ID and a bank account number
- 3) E-services involve the use of authentication and user data
- 4) Any other additional data required for customer identification and effective management, such as the cadastral register number and land ownership data, forest reserve and forestry tax data as well as photos and location data on the sites.
- 5) Data related to marketing and other communications, such as campaign history, other marketing, visiting and contact history, areas of interest, subscription data related to our publications
- 6) Data related to potential agreements and negotiations as well as to previous offers, agreements and negotiations
- 7) Data related to solvency assessment, invoicing and collection
- 8) Customer feedback and interviews as well as reports from customers concerning compliance violations
- 9) Transaction data, such as sign-ups, data on diet preferences, participation data
- 10) Data related to sanctions (in accordance with national legislation)
- 11) Data stating that a person does not want to receive marketing messages at all or via a certain channel
- 12) Data related to the device used by the customer and browsing data related to the use of various cookies, but only to the extent that the customer has consented to the use of cookies or otherwise consented to the collection of said data.

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

Stora Enso does not collect data relating to a person's sexuality, sexual orientation, disability, race, ethnic or social origin, religion or beliefs, political or other social opinion (excluding cases in which such information is related to the person's status in business or a public role and the information can be regarded as public by the respective individual themselves) or being a member of a national minority, unless this is required by law or necessary to fulfilling a legal obligation that Stora Enso is subject to.

Furthermore, Stora Enso does not intentionally collect data relating to a data subject's health, but in some rare cases such information may be inferred from data on diet preferences a person has provided to Stora Enso that Stora Enso collects in connection with 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 purposes described in section 3.

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Regular sources of information

Personal data is primarily collected from you directly or it is produced through the correspondence you engage in with Stora Enso and through the use of services, including web pages. In addition to this, 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 indirectly 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.

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Data retention

Stora Enso regularly maintains, corrects and deletes unnecessary and outdated personal data when your customer relationship or other corresponding connection with Stora Enso is active. When your relationship and connection with Stora Enso becomes passive, Stora Enso will still retain your personal data for prescribed time periods. These time periods have been defined based on Stora Enso's real needs and its legal obligations, such as in order to fulfil accounting obligations. As a 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 is deemed as having ended. For more information regarding the retention times of your personal data, please contact Stora Enso using the contact information listed in section 2.

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Regular data disclosure

Stora Enso's forest owner and private customer register data is disclosed to auditors, insurance companies and various government agencies (or similar) for the purpose of carrying out their statutory duties. Data may be also disclosed to banks in connection with carrying out 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. Furthermore, in special cases we may disclose data to actors in the forestry sector for research and development purposes.

Your data may be disclosed to other companies within the Stora Enso group for purposes specified in section 3.

Certain functions related to the processing of customer data have been outsourced to carefully selected service providers in order to support Stora Enso's internal operations (such as felling, transport and forest service entrepreneurs, IT providers as well as service providers offering marketing services, for example in connection with events, mailings and marketing). In such situations, we ensure the protection of data 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.

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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. In such situations, Stora Enso as the data controller ensures that a sufficient level of data protection is maintained with appropriate data protection mechanisms, such as EU Commission model clauses. A contractual framework based on the EU Commission's model clauses has been created for personal data within the Stora Enso group.

For more information on protection mechanisms, contact Stora Enso using the contact information listed in section 2.

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Data protection

Personal data in Stora Enso's IT systems are protected against unauthorized access with various data protection mechanisms. Each user has a personal user ID and password for entering the IT systems, and access to personal data is restricted to persons who need the access in order to fulfil the tasks and duties relating to their role within Stora Enso or to provide services in accordance with an agreement between Stora Enso and a supplier.

Stora Enso and its IT system and service providers monitor the provision of data protection as well as the reliability and integrity of the IT environment, and have established technical protection mechanisms to prevent and detect personal data breaches.

The security of personal data is also ensured when transferring or disclosing data. The agreed protection mechanisms vary based on the type of data and may include, for example, the strong identification of recipients and data encryption.

10**Your rights**Access to information (right to inspect data)

You may request that Stora Enso provide information on what personal data concerning you is stored in the register and obtain a copy of this data. You are kindly asked to use the template provided for this purpose, which can be found on the Privacy page. You may submit the completed form or a request including similar information to Stora Enso in accordance with section 11.

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, in cases where you are waiting for a decision on your request to access or erase your personal data. You are kindly asked to use the template provided for this purpose, which can be found on the Privacy page. You may submit the completed form or a request including similar information to Stora Enso in accordance with section 11.

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 for this purpose, which can be found on the Privacy page. You may submit the completed form or a request including similar information to Stora Enso in accordance with section 11. If you would like to object to the processing of your personal data for such particular reasons, we ask that you explain the particular situation when submitting a request to Stora Enso regarding your objection.

Data portability

You are entitled to receive an electronic copy of the personal data that you have directly provided, whose processing is based on the drafting and fulfilment of the agreement between you and Stora Enso or the processing of personal data is based on your consent. In some cases, where existing technology allows for the electronic transfer of data directly from Stora Enso's register to another data controller's system, you may also request this type of data transfer.

Right to revoke your consent

You have the right to revoke your consent at any time if the processing of your personal data has been based on your consent.

Right to file a complaint

As a data subject, you are entitled to file a complaint with a competent data protection authority regarding Stora Enso's processing of personal data.

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**Data controller
contact information**

In all questions and matters involving personal data processing or rights of the data subject, you should contact the data controller. Requests related to the rights of data subjects should be submitted by email to data.privacy@storaenso.com.

Stora Enso is entitled to decline requests on statutory grounds. Stora Enso shall also always inform you if your request is denied and explain the reasons for denying your request.