



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

2.1.2023

### 1

#### **Purpose**

The purpose of this Privacy Notice is to provide you as a data subject communicating with Stora Enso or 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) with information about Stora Enso’s processing of your personal data as a data controller. This Notice gives a general understanding of 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 you in connection with the collection of your personal data. If you wish to have more detailed information in relation to how your personal data is being processed, you should contact Stora Enso and use the contact information provided in section 2 of this Privacy Notice.

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#### **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 applicable data controller in each situation, you can always use their rights by contacting Stora Enso Oyj:

**Address:**

Stora Enso Oyj  
Salmisaarenaukio 2  
P.O.Box 309  
FI-00101 Helsinki  
Finland

**Email:**

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

**Telephone:**

+358 20 46 111

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**Legal basis  
and Purposes  
of Personal  
Data  
Processing**

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 personal data of you, representing and working for the customer companies and other legal entities, is inevitable. Stora Enso may also collect personal data of you as a representative of a potential customer. In some situations, the relationship is directly between Stora Enso and you.

The legal grounds for processing personal data are either fulfilment of an agreement concluded between a Stora Enso group company and you, legal obligation, the legitimate interest of Stora Enso or your consent.

Having a contract or preparation of a contract to which you are a contract party usually requires processing of personal data. Such agreements exist typically between Stora Enso and private forest owners (see separate Notice) and customers of our web-shops. Providing certain personal data to Stora Enso is necessary for Stora Enso to be able to conclude an agreement with you. If you refuse to give this personal data, Stora Enso may not be able to establish or continue the business relationship.

In certain cases, Stora Enso has a legal requirement to collect information of its customers and their representatives. These situations relate e.g. to anti-money laundering and counter terrorism regulation, market abuse regulation, compliance breach reporting, reviewing of sanctions and other similar official lists and auditing.

Processing of personal data based on a legitimate interest applies when it concerns establishing, managing and developing Stora Enso's customer relationships (including concluding and managing agreements with organisations that you are representing) with activities related to marketing, sales, invoicing, deliveries and communications. Stora Enso may use personal data to fulfil customers' and potential customers' information requests, develop products and services by analysing their interests and organising events and exhibitions. The customer and sales registers are used also for more general communication purposes. The communication may be tracked and analysed by Stora Enso if you have consented to electronic marketing communication. Evaluating data aggregated through customer communications and other customer interactions and enriching it with industry and company data is used to optimize user experience and content offers and to evaluate needs for customer satisfaction and sales interest related actions. This may include targeting of marketing, satisfaction surveys and other kinds of feedback on Stora Enso's products and operations as well as sales related communications. Stora Enso may

group customers and potential 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 you have allowed, Stora Enso may target specific content that is not automatically visible to some other users of the website. Please see our Website Notice and Cookie Notice available at [Stora Enso Privacy](#) for further information about Stora Enso's use of cookies and communication tracking.

Customer categorization might partly be based on automated decision-making. However, Stora Enso never uses your personal data for automated decision-making that could produce legal effects concerning you or similarly significantly affect you. Segmentation typically uses part of the customer profile, for company segmentation Stora Enso may use the whole customer profile. Stora Enso always ensures that the segmentation is based on substantive criteria that are not discriminatory.

Additionally, Stora Enso processes personal data to ensure visitors' safety and its facilities' and premises' security against misuses, thefts or unauthorized accesses. Stora Enso may also need to process personal data in order to ensure the security and functionality and to track the usage of the Stora Enso IT systems and on-line services.

In limited cases (usually when required by local laws), Stora Enso may need to request your consent for certain specific data collection or processing. Such consent can be at any time cancelled by you by using technological means or contacting Stora Enso in accordance with section 11.

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##### **Content of the Register**

The personal data Stora Enso may collect and process within the customer registers 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 birthdate and ID number
- 3) User, identification and user activity information related to online tools and services
- 4) Marketing and communications information, e.g. campaign and other communications material delivery, user activity and visit history, communication contents, interests and time zone
- 5) Information relating to sales, projects, opportunities, customer visits and lead sources you are connected with as well as other project data and historical project information (including successful and unsuccessful projects)
- 6) Customer feedback and interview records as well as compliance breach notices received from customers
- 7) Event related information, such as rsvp data, diet related information and attendance confirmation
- 8) Sanctions screening data (as required and allowed by national laws)
- 9) Information if you do not want to receive marketing messages or other communications
- 10) Data related to the device used by you and browsing data, however only to the extent you have consented to the use of cookies or the collection of said data.

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 3.

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 your health, however in some rare cases such information may be inferred from the diet information you have 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 3.

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### **Regular sources of Information**

Personal data is primarily collected directly from you e.g. when subscribing for any marketing material and registering for the events or aggregated through the communications and other co-operation Stora Enso has with you. Another typical source of information are the companies and other legal entities you represent 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 and industry databases.

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### **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 you and Stora Enso are active. After the relationship between you 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 after five years of passive retention when the customer or other relationship between Stora Enso and you has ended. For more information regarding the retention times, please contact Stora Enso in accordance with section 11.

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### **Regular Data Disclosures**

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. When necessary, personal data may be disclosed to other business partners providing services such as agents and transportation companies. Such third parties are allowed to process the data only to the extent necessary to provide the service that has been agreed with Stora Enso. Stora Enso never sells personal data to anyone.

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

Certain data processing activities may be outsourced to carefully selected third party service providers (such as IT service providers, marketing service companies, consultants and social media companies) in which case such third-party processors operate on behalf of Stora Enso under a specific written data processing agreement.

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### **Data**

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

**Transfers from EU/EEA**

and/or European Economic Area. 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. 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 11.

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**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 and with 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.

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**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

In case of a legal obligation to request your consent for data processing, you have the right to withdraw your consent.

#### 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.

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### **Contacting the Data Controller**

In all questions and matters relating to personal data processing or your rights, you should contact Stora Enso. You may use your 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 you of such a decline including the grounds for the decline.