

# Privacy Notice – Stora Enso’s Recruitment Register

13.1.2023

## 1

### **Purpose**

The purpose of this Privacy Notice is to provide the persons applying for positions with the Stora Enso group (“Stora Enso”) information about the processing of their personal data. This Privacy Notice gives a general understanding of such personal data processing. Thus, all of 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 persons in connection with the collection of their 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 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. Further information on the subsidiaries can be found [here](#).

In respect of each candidate’s personal data, the controller is regarded to be the recruiting company of the respective position. If the person is also applying for other positions within Stora Enso or allowing his/her information to be used in the recruitment of other open positions, and his/her personal data is transferred to such companies, those companies are also regarded as controllers in relation to the personal data they receive, collect or otherwise process.

Regardless of the relevant data controller in each situation, the data subjects 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 46 131

### 3

#### **Lawfulness and Purposes of Personal Data Processing**

The legal ground for processing personal data is the data controller's legitimate interest relating to recruiting. For some parts, processing personal data is also necessary for the purposes of preparing an employment contract. Stora Enso may also have a legal obligation to collect certain information of the applicants. Applicants are also asked, when relevant, for a consent to use automatic decisions during the recruitment and to share the applicant data for future job opportunities. In some instances, local legislation may require the data controller to acquire an applicant's consent for processing certain type of personal data or for conducting certain processing activities e.g. for aptitude testing, background screening and data collected from external sources. In such situations, the necessity requirement is always considered and personal data relevant for fulfilling Stora Enso's reasonable legitimate interest shall be collected under the consent.

The purpose of processing personal data is to receive and handle applications from job applicants for recruitment purposes and to be able to select a suitable applicant for an opening within Stora Enso or an otherwise suitable applicant for the group's current resource needs and to communicate with the candidate during the process. The data may also be analysed and used for internal reporting purposes, however, in such cases the data is presented in a pseudonymous or (as far as possible) anonymous form.

In certain cases, the data may be used for fulfilling Stora Enso Oyj's or the local company's statutory obligation. Such obligations may relate to e.g. proving that the

recruitment decisions have been non-discriminatory.

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

The recruitment register contains following information about the data subjects:

- Basic personal data identifying the applicant such as name and contact information
- CV and a cover letter submitted by the applicant
- Applicant's language skills, education, licences and certificates
- Applicant's current job function, management responsibility, organisational sector, industry and previous work experience; if the applicant is already working for Stora Enso, also information relating to the employment history within Stora Enso
- Salary level and salary request information
- Information obtained from interviews (telephone, video, face-to-face)
- Communication during the recruitment process
- Information received from reference persons named by the applicant relating to the applicants' former performance and suitability as well as personal qualifications relevant for the open position
- Subject to the applicable laws and applicants' consent, information relating to the evaluation and assessments of the applicants' suitability for the open position as well as personal qualities relevant in respect of the open position
- Subject to the applicable laws and applicants' consent, information collected from other sources than named by the candidate
- Subject to the applicable laws and applicants' consent, background check information, such as information obtained through security clearances or similar information sources
- Potential other similar or relevant application-related information such as applicant assessment reports by recruitment consultants which the job applicants may want to disclose to Stora Enso in connection with their job application

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##### **Regular Sources of Information**

The information is usually collected from the job applicants themselves. If the candidate refuses to provide the personal data requested in the application form, candidate may not be able to continue the recruitment process. Stora Enso may use also external sources

as accepted or provided by an applicant (e.g. Linked-in account) and as allowed by applicable laws. Information may also be obtained from recruitment consultants interviewing applicants and, subject to the applicants' consent, from Stora Enso's service providers handling aptitude assessments as a part of the recruitment process as well as from reference persons whose contact details the respective job applicant has provided. Also, subject to the applicable laws and applicants' consent, information may be obtained through background checks, security clearances and other similar information sources deemed necessary due to the nature and security requirements related to the open position in question.

## 6

### **Data Retention**

During the recruitment process, Stora Enso and the local company relating to the respective recruitment process will actively update the applicant's personal data and delete unnecessary and outdated data. Candidate can also access, modify, supplement, update or delete own personal data in the tool whenever the persons wishes to. After the recruitment process has ended, Stora Enso passively retains profile and all data within for pre-defined time periods based on Stora Enso's and local companies' genuine needs and legislative requirements. The regular retention time for inactive job applicant account is two years. However, in certain cases e.g. for purposes of defending a claim or if the local legislation requires for a longer retention period, certain information may be retained for longer. Also in these cases the personal data is, however, eventually deleted, when the purposes of retention no longer exist. For more information regarding the retention times, please contact Stora Enso as instructed in Section 12 of this Privacy Notice.

If the applicant is chosen for the position, the basic information of the respective applicant as well as other information relevant for the employment relationship shall be transferred to Stora Enso's employee registers. Also, if the applicant is already employed by Stora Enso, the basic information relating to the fact that the person has applied for the respective position, may be retained even if the person is not selected for the position.

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### **Regular Data Disclosure**

Personal data of job applicants is accessed by Stora Enso employees involved in hiring processes. Certain recruitment processing activities may be outsourced to third parties for the purposes of providing additional recruitment services. E.g., online tools and video interviews may be outsourced to external suppliers. Data may also be processed by external HR consultants who are handling applicant and aptitude assessments and supporting Stora Enso in the recruitment process. In these cases, such third-party processors operate on behalf of Stora Enso. Data is always disclosed for purposes compatible with the processing purposes defined in Section 4 of this Privacy Notice.

**8****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. 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.

**9****Data Security**

Personal data in Stora Enso's recruitment 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.

Applicant data is primarily handled electronically in the recruitment systems. If print-outs are made or any manual data is otherwise processed, the persons handling the recruitment process have been instructed to handle the material carefully, ensuring that the material is disclosed only to such employees of Stora Enso who are responsible for the respective recruitment and thereto related decisions as well as to destroy the material when no longer needed in connection with the relevant recruitment process or if so requested by the applicant.

**10****Automated decision making**

In recruitment processes where the volume of the applicants, open positions or other similar reasons causes Stora Enso a substantive administrative burden, Stora Enso may use automatic recruitment decisions in the first phases of the recruitment. The decision

making is based on the information the applicant has given regarding his/her education, certifications and work experience as well as possible competence evaluation questionnaires (completed by the applicant him-/herself). This data is then automatically reflected to certain pre-defined requirements set for the open position(s) in question. The requirements used for the automatic reflecting are presented to the applicants on a general level in the respective job advertisement. As a result of the automatic reflecting, an automatic decision is produced regarding whether the applicant's attributes and qualifications are suitable for the position. Based on this decision, the applicant is either invited to the next round of recruitment or the applicant receives an e-mail informing him/her that the recruitment process regarding the respective applicant has ended.

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### **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 of 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 [Storaenso.com/privacy](https://storaenso.com/privacy) site for such requests. The filled-out form or a request including similar information may then be 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 such personal data that is inaccurate, outdated, unnecessary or contrary to the purposes of data processing corrected or erased. 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 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 processing of personal data concerning him/her, provided that the processing is based on the data controller's legitimate interest.

A data subject may send his/her request to restrict the processing in accordance with 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

An applicant is entitled to receive an electronic copy of the personal data that has been provided by him/her for the purposes of performance of 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 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

A data subject is entitled to lodge a complaint with the 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.