

## Privacy Statement

This Metsä Board Oyj customer and stakeholder privacy statement ("Privacy Statement") describes our personal data handling practices including a description of the gathered personal data and how the personal data is processed. This Privacy Statement may be changed without prior notice to the extent possible under the applicable legislation.

- 1. Data Controller** Metsä Board Oyj, registered address of the head office at Revontulenpuisto 2, 02100 Espoo, Finland
- 2. Contact Person** Please contact by e-mail [privacy@metsagroup.com](mailto:privacy@metsagroup.com)
- 3. Name of the Register** Metsä Board's customer relationship management register (the "Register") including information from Metsä Board CRM Scoreboard and Metsä Board Online customer self-service tool.
- 4. The purpose and legal ground of processing personal data** Metsä Board is a part of Metsä Group. The Register is used by Metsä Board and its subsidiaries and on a need to know basis also by other companies belonging to Metsä Group ("Metsä Board").

The Register contains personal data of Metsä Board's customers and stakeholders and their respective contact persons. Metsä Board uses the personal data collected in connection with customer and stakeholder relationship management activities and for supporting its business analysis and operations, business intelligence, customer surveys, know your customer (KYC) process, reporting, invoicing, delivery of products, quality management, improving products and services, personalizing content and marketing.

Our legal ground for collecting and processing personal data is either (i) legitimate interest based on the business relationship and / or (ii) the performance of a contract, as applicable.

Metsä Board does not disclose personal data to unauthorized third parties. Metsä Board may share the personal data with such third parties Metsä Board has engaged to provide services. These third party data processors are contractually bound to use any personal data disclosed to them only to perform the contracted services. Further, Metsä Board may disclose personal data to authorities or other third parties, if required by applicable legislation.

## 5. Processed Personal Data

Personal data such as:

- Name
- Office address, postal code, city, country
- Work phone number
- E-mail address
- Organization
- Education

- Job Title and role and role classifications (decision maker, top manager, main user, extranet contact)
- Language
- Gender
- Conference and meeting preferences and requests
- Contact preferences (phone/email/mail restrictions)
- Web behavior information (depending on data subject's activity)
- Service/software use behavior information
- Links to Twitter, Facebook, LinkedIn profile page
- Indicator of access to Metsä Board's digital platforms
- Last data processing activity (time stamp)
- Customer survey communication prohibition
- Consent or prohibition for marketing

Personal Data collected in connection with the use of the service / website etc. such as:

- Service / website usage;
- Device information;
- Log information;
- IP address;
- Cookies and similar technologies;

## **6. Regular sources of information and cookies**

Personal data is provided by (i) by the registered person himself/herself or other persons representing the customer as part of the customer using the service (Online) or (ii) by Metsä Board personnel upon the commencement of or during the co-operation with Metsä Board (CRM). Personal data is also collected by Metsä Board in connection with the use of Metsä Board's or its group companies' websites or online services by the registered person.

Our websites use cookies to make your browsing experience better and more personal. A cookie is a small text file saved on the user's device by a web browser. More information on cookies is available at

<https://www.metsagroup.com/en/Pages/cookies.aspx>

By using the websites or services, the registered person approves the use of cookies. If the registered person wants to disable cookies, he/she should refer to his/her browser help menu to learn how to disable cookies. If the registered person denies accepting cookies, he/she may not be able to access or use the service.

## **7. Regular destinations of disclosed data and whether the data is transferred to countries outside the EU/ EEA**

Metsä Board may process personal data in such jurisdictions Metsä Board has presence. In some cases Metsä Board uses external service providers to collect, use, analyze and otherwise process data on its behalf. These service providers are bound to use personal data shared with them only to perform their services Metsä Board has hired them to provide. Metsä Board may also share your personal data to the extent necessary to meet any applicable law, regulation, legal process or enforceable governmental request.

The personal data can be processed within EU/EEA and outside EU/EEA. Metsä Board will only transfer your personal data outside

the EU/EEA in accordance with one of the legal grounds described below:

- the recipient country is regarded by the European Commission to provide adequate protection for your personal data;
- we have put in place appropriate safeguards for the transfer by using the model clauses for the transfer of personal data to third countries issued by the European Commission; or
- you have given your consent to the transfer, or there is another legal basis for the transfer under the applicable data protection legislation.

## 8. Data Security

Personal data is handled with care and in confidence. The register is only used by personnel whose job requires processing of the personal data.

Users login to the register by either giving their personal user ID and password, or by utilizing single-sign on technology. User rights require separate approval from nominated Metsä Board personnel.

All personal data is protected by regularly reviewed appropriate technical and organizational data security measures against accidental and/or unlawful access, alteration, destruction or other processing including unauthorized disclosure and transfer. Such measures include proper firewall arrangements, appropriate encryption of telecommunication and messages, secure server rooms and up-to-date ICT system access management practices.

## 9. Your rights

You have the right to:

- access, update, remove and correct your personal data;
- object to the use of your personal data on grounds relating to your particular situation when our legal ground for processing your personal data is our legitimate interest;
- demand Metsä Board to restrict the processing of your personal data; and

You can exercise any of your rights above by contacting Metsä Board via our privacy website <https://www.metsagroup.com/en/Pages/privacy-policy.aspx>. Alternatively you may visit us in person or contact us by post at the address set out in this section 9. Metsä Board may request you to specify your request in writing and will always authenticate your identity before handling your request.

If you are unhappy with the way we process your personal data, you have a right to make a complaint to the competent supervisory authority, who is responsible for monitoring compliance with the applicable data protection legislation.

**Requests shall be submitted in writing to:**

Metsä Board Oyj  
Attn: Legal Services  
Revontulenpuisto 2  
02100 Espoo  
Finland

**Request can be submitted in person to:**

Revontulenpuisto 2  
02100 Espoo  
Finland

When submitting a request, a valid identification card containing a photo must be presented.

**10. Data retention policy**

Personal data is retained only as long as necessary and justifiable under applicable law or as may be required by applicable law.

Metsä Board's customers' and stakeholders' personal data is actively maintained throughout the life-cycle of the co-operation in question. Personal data is marked as passive at the end of the co-operation after which the data is no longer actively used. Any personal data marked as passive will be deleted in accordance with Metsä Board's data retention principles. However, the personal data may be retained for an extended period if required by applicable law or for the exercise of claims or due to litigations or internal investigations.