

Privacy Statement – Compliance and Ethics Channel (Whistleblowing Channel)

This Metsä Group privacy statement describes our personal data handling practices including a description of the collected 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

Metsäliitto Cooperative (hereinafter “Metsä Group”), registered address of the head office at Revontulenpuisto 2, 02100 Espoo, Finland.

Depending on the applicable national legislation regarding the Whistleblowing Directive ((EU) 2019/1937), Metsä Group’s local legal entities may also act as controllers of personal data for the cases reported under the said directive.

2. Contact person

Please contact by e-mail:
privacy@metsagroup.com

3. The purpose for processing personal data

Metsä Group Compliance and Ethics Channel (“Channel”) provides an opportunity to report suspicions of misconduct; anything that is breaching the law or is not in line with Metsä Group’s values or Metsä Group’s Code of Conduct. The Channel is also to be used in connection with the so called Whistleblowing Directive for reporting any violations of European Union and/or national laws under the scope of the directive. Personal data may be processed in connection with the Channel while notifications/reports are being sent via the Channel. The personal data will only be processed for handling the reports and reacting on the possible wrongdoings.

Our legal basis for collecting and processing personal data is either i) Metsä Group’s legal obligation under the Whistleblowing Directive and its implementing national legislation or ii) legitimate interest based on 1. Metsä Group’s obligation to ensure compliance with applicable legislation, 2. Metsä Group’s continuous efforts to promote an open, safe and ethical business environment and 3. the vendor/customer/employment/other stakeholder relationship between Metsä Group and the data subjects.

5. Processed personal data

When using the Channel for reporting, personal data may be received via the Channel by Metsä Group on i) people who make the report and ii) people whose claimed misconduct is being reported. The report may be done anonymously. However, we encourage the reporters to leave their contact details for the efficient processing of the matter. We do not intend to process any special categories of

Metsä Group

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firstname.lastname@metsagroup.com

personal data (such as data related to an individual's health, race, religion or political opinions).

The personal data received via the Channel may include for example the following personal data:

- first and last name
- language
- contact details (e.g. email, phone number)
- role and job title
- gender
- details on the reported misconduct

6. Regular sources of information

Data is collected via the Channel when a person makes a report/notification on a certain misconduct one has experienced or notified, and during the further investigation process. During the investigation, the individuals may be contacted and further details may be asked from him/her and the accuracy of the personal data may be checked (if the individuals are identifiable from the report).

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

Metsä Group does not disclose personal data to unauthorized third parties. Metsä Group may disclose personal data to authorities or other third parties, if required by the investigation or applicable legislation.

Metsä Group uses an external service provider to provide the Channel. The service provider and its subcontractors act as data processors of Metsä Group and the personal data will be processed by such service providers only for the provision of services to Metsä Group and on behalf of Metsä Group.

Metsä Group may process personal data in such jurisdictions Metsä Group has presence. Therefore, the personal data may be processed within EU/EEA and outside EU/EEA. Metsä Group will only transfer your personal data outside the EU/EEA in accordance with one of the legal bases 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 standard contractual 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.

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8. Data security

Personal data is handled with care and in confidence. The register is only used by restricted personnel whose duties include the investigation of any misconduct reported via the Channel. That is mainly done by the Metsä Group Compliance Committee and/or local specifically nominated persons. The reports received via the Channel are strictly confidential.

The access to the register in the Channel is password protected. Access rights are based on Metsä Group's strict protocol and assessed regularly.

All personal data is protected by regularly reviewed appropriate technical and organisational 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 messages, secure server rooms and up-to-date ICT system access management practices.

9. Data subject 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 the particular situation when our legal ground for processing your personal data is our legitimate interest;
- demand Metsä Group to restrict the processing of your personal data.

The rights above may be exercised via our privacy website <https://www.metsagroup.com/en/Pages/privacy-policy.aspx> or by visiting us in person or contacting by post at the address set out in this section 9. Metsä Group will always authenticate your identity before handling the request.

Please note that your right may be refused if the processing of your personal data is necessary for the ongoing investigation of any claimed misconduct or for Metsä Group's legal obligations under the Whistleblowing Directive or other applicable legislation.

If you are unhappy with the way we process your personal data, you have the 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:
Metsäliitto Cooperative

Metsä Group

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17.12.2021

Attn: Legal Services

Revontulenpuisto 2
02100 Espoo
Finland.

Request can be submitted in person at:

Revontulenpuisto 2
020100 Espoo
Finland.

10. Data retention

Personal data is retained only as long as necessary and justifiable for the purposes of handling the reports via the Channel, internal investigations or litigations or as required by applicable national legislation. The retention times are assessed regularly.

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