

## Privacy Statement

This Metsä Fibre's Rauma sawmill project ("project") privacy statement ("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** Metsä Fibre Oy / Rauma sawmill project, registered address of the head office at Revontulenpuisto 2, 02100 Espoo, Finland.
  
- 2. Contact information** Please contact by e-mail:  
[rmstyomaatoimisto@metsagroup.com](mailto:rmstyomaatoimisto@metsagroup.com)
  
- 3. Name of the Register** Metsä Fibre Rauma sawmill personal data register ("Register")
  
- 4. The purpose and legal ground of processing personal data**

Metsä Fibre is part of Metsä Group. The Register is used by Metsä Fibre and its subsidiaries and on a need to know basis also by companies belonging to Metsä Group ("Metsä Fibre").

The Register contains personal data of the personnel of project's contractors, vendors and subcontractors. Metsä Fibre uses the personal data collected for the following purposes: on-site health and safety monitoring (including vehicle speed monitoring), access management, contract management, fulfilling legal obligations and other legitimate purposes necessary for the completion of the project.

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

Metsä Fibre does not disclose personal data to unauthorized third parties. Metsä Fibre may share the personal data with such third parties Metsä Fibre 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 Fibre may disclose personal data to authorities or other third parties, if required by applicable legislation.
  
- 5. Processed Personal Data** Personal data such as:
  - Name
  - Address
  - Phone number
  - E-mail address
  - Tax number
  - Nationality
  - Language
  - Gender
  - Photo

- Passport copy
- Organisation
- Title / job role / job role description
- Qualifications (training data and permits)
- On-site access control data
- Vehicle registration number
- Loss of on-site driving permit e.g. due to speeding
- Covid-19 test data

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

Personal data is collected during on-site induction when the person enters the project site for the first time. The data is provided by the person himself/herself or by other persons having the right to provide the data, such as the employer or main contractor representative. The personal data is entered into the register (Site Manager) by Metsä Fibre or the main contractor. Personal data is also collected in connection with contract management during the project (M-files). The data content is updated during the project and transferred to other systems and/or services used by Metsä Fibre when necessary.

Metsä Fibre receives possible positive Covid-19 test results directly from the service provider (Suomen Terveystalo). In addition, Metsä Fibre receives a report confirming that everyone working on-site during the project has been tested to control on-site safety during the pandemic. All personal data related to the Covid-19 testing practices is being kept separate from other personal data controlled by Metsä Fibre and accessed only by specifically named employees. The personal data is used only to track possible chains of infection and to take care of on-site safety and legal requirements.

Personal data is also collected by Metsä Fibre in connection with the use of Metsä Fibre'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 visiting our websites, 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 Fibre may process personal data in such jurisdictions Metsä Fibre has presence. In some cases Metsä Fibre 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 Fibre has hired them to provide. Metsä Fibre 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 Fibre 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. Covid-19 related test data is processed only by separately named personnel of Metsä Fibre who have committed to confidentiality. Any Covid-19 related test data is stored separate from any other personal data controlled by Metsä Fibre.

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 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 Fibre to restrict the processing of your personal data; and

You can exercise any of your rights above by contacting Metsä Fibre 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 Fibre 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 or in person to:**

Metsä Fibre Oy / Rauman sahaprojekti  
Maanpäätie 6  
26820 Rauma

When submitting a request in person, 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 or as required by applicable legislation.

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. Personal data marked as passive will be deleted in accordance with Metsä Fibre's data retention principles. However, the personal data may be retained for an extended period if required by applicable law, for the exercise of claims or due to litigations or internal investigations.