

## Privacy Statement

This Metsä Spring stakeholder register 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 Spring Oy, registered address at Metallimiehenkuja 10, 02150 Espoo, Finland
  
- 2. Contact Person** Please contact by e-mail:  
[niklas.vonweymarn@metsagroup.com](mailto:niklas.vonweymarn@metsagroup.com)
  
- 3. Name of the Register** Metsä Spring stakeholder register (“Register”)
  
- 4. The purpose and legal ground of processing personal data**

The Register is used by Metsä Spring and its affiliated companies in Metsä Group, including its parent company Metsäliitto Cooperative, as well as when needed by other Metsä Group companies Metsä Board Oyj, Metsä Fibre Oy and Metsä Tissue Oyj together with their respective subsidiaries (hereinafter together and separately referred to as “Metsä Spring”).

The Register contains personal data of contact persons of stakeholders including, inter alia, prospects (i.e. potential investment objects), investment objects, co-financiers, and external service providers (subcontractors).

Metsä Spring 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 a legitimate need and interest to contact you for enabling possible collaboration.

Metsä Spring does not disclose personal data to unauthorised third parties. Metsä Spring may, however, share the personal data with such third parties, of whom Metsä Spring is purchasing services. In case of third party data processors, these entities are contractually bound to use any personal data disclosed to them only to perform the contracted services. Further, Metsä Spring may also disclose personal data to authorities or other similar third parties, if required by applicable legislation.
  
- 5. Processed Personal Data** Personal data such as:
  - Name
  - Personal job phone number

- Personal job e-mail address
- Personal twitter account
- Organisation (affiliation)
- Position / Job Title / Role
- Organisation address
- Preferred language
- Contact person information

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

Personal data is provided, inter alia, by (i) by the registered person himself/herself or other persons representing the stakeholders or (ii) by a Metsä Group colleague, and iii) by third parties.. More specifically, personal data can be collected by Metsä Spring, or its external service provider, in connection with the use of Metsä Spring's or its affiliate 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, you approve the use of cookies. If you want to disable cookies, you should refer to your browser help menu to learn how to disable cookies. If you deny accepting cookies, you 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 Spring is collecting disclosed data in a CRM system. Metsä Spring may process personal data in such jurisdictions, in which Metsä Spring has presence. In some cases Metsä Spring uses external service providers to collect, use, analyse and otherwise process data on its behalf. These external service providers are bound to use the personal data shared with them only to perform the services Metsä Spring has hired them to provide. Metsä Spring 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 Spring 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. IutData 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 works by either giving a personal user ID and password, or by utilizing single-sign on technology. User rights require separate approval from nominated Metsä Spring personnel.

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; and
- demand Metsä Spring to restrict the processing of your personal data.

You can exercise any of your rights above by contacting Metsä Spring via our [privacy website](#). Alternatively you may visit us in person or contact by post at the address set out in this section 9. Metsä Spring 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 Spring  
Metallimiehenkuja 10  
02150 Espoo  
Finland

### **Request can be submitted in person at:**

Metallimiehenkuja 10  
02150 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 or as required by applicable legislation.

Metsä Spring's Register's 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 will be deleted in accordance with Metsä Spring'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.