

Privacy notice – consumer customer

Background

The purpose of this information is to provide information in a clear and transparent manner of SCA's processing of Personal Data relating to you who as an individual is a customer (consumer) to SCA.

Scope

This information applies to you who are:

- Private individual who is a customer to SCA (consumer customer)

Introduction

Personal Data means any information which directly or indirectly, together with other information, can be connected to a natural person, such as e.g. name, contact details, work position etc.

We are committed to transparency in respect of how your Personal Data, whether provided to us by you or if we have collected them in any other way, is being processed. We undertake efforts to ensure that the processing of your Personal Data is compliant with applicable data protection legislation and that your Personal Data are protected while in the care of us or our partners.

In this information we explain how and why SCA processes Personal Data within SCA's business.

Processing of Personal Data

Data Controller

The respective company within the SCA Group is the Data Controller for its processing of your Personal Data, which is processed within the framework of SCA's business relationship with you.

Collection of Personal Data

When you use our services, enter into agreements and purchase goods or services from us, contact us via telephone, e-mail or letter, participate in our events etc. we will process the Personal Data that you provide us with. We collect Personal Data when we first establish a contact with you but also Personal Data that you provide us with on an ongoing basis during our business relationship due to legal obligations that are imposed on us as companies. We may also receive e-mail and other correspondence and material which includes Personal Data

relating to you and will as a consequence process such Personal Data. If required we will inform you of such processing.

Examples of Personal Data

We have chosen to structure and divide the Personal Data into different categories and it is the categories of Personal Data that we present for each processing activity. Each category of Personal Data includes a number of Personal Data attributes. Below are examples of Personal Data attributes in each category.

Category of Personal Data	Examples of Personal Data attributes
General Personal Data	Name of contact persons E-mail address
Additional Personal Data	Home address Home phone number
Identity Personal Data	Personal identification number Nationality
Performance related Personal Data	Evaluations Development/progress
Financial Personal Data	Invoice Reference

Personal Data processing activities

On the basis of your consent, our legitimate interest to maintain and fulfill our business relationship with you, and to fulfill the legal obligations which are imposed on us as companies, we may process your Personal Data to the extent required to fulfill these purposes. Below you find information about the processing activities of your Personal Data that we do and our purposes with such processing.

- **Active business relationship and sales**
To maintain and fulfill SCA's business relationship with you as a customer to generally enable the sale of goods and services to you as well as in respect of individual and specific transactions. Personal Data that we process for this purpose are General Personal Data, Additional Personal Data, Identity Personal Data and Financial Personal Data.
- **Delivery**
To generally enable deliveries of goods and services to you as well as in respect of individual and specific transactions. Personal Data that we process for this purpose are General Personal Data, Additional Personal Data, Identity Personal Data and

Financial Personal Data.

- **Complaints**

To generally, as well as in respect of individual and specific transactions, enable complaints in relation to goods and services delivered to you. Personal Data that we process for this purpose are General Personal Data, Additional Personal Data, Identity Personal Data and Financial Personal Data.

- **Book keeping**

To keep records for book keeping for financial transactions, e.g. sale of goods and services, to ensure compliance with legal obligations. Personal Data that we process for this purpose are General Personal Data, Identity Personal Data and Financial Personal Data.

- **Customer survey**

To facilitate customer surveys for the purpose of e.g. investigating how satisfied you are with our goods and services within the area where we have a business relationship. Personal Data that we process for this purpose are General Personal Data and Performance related Personal Data.

Recipients of Personal Data

Recipients with whom we share Personal Data or that we may come to share Personal Data with are:

- **Service providers**

SCA engages partners and service providers who perform services on SCA's behalf, such as provision of IT services, marketing services etc. In the course of performing such services the service provider/partner may be given access to your Personal Data. These companies are only allowed to process Personal Data in accordance and strict compliance with the Data Processing Agreement entered into with us and in accordance with the specific instructions they receive from us in connection with the execution of such agreement, and thereafter. They are not allowed to use your Personal Data for their own purposes and they are required under law and agreement to protect your Personal Data. A service provider may not share your Personal Data with third parties without the authorization of SCA.

- **Authorities**

SCA may provide Personal Data to public authorities if we are required to do so according to law or a decision by a governmental authority. Such data may include your Personal Data. In connection with a legal dispute it may be relevant to transfer information which includes Personal Data also to other parties to the dispute.

Retention periods for Personal Data

As a general rule we will process your Personal Data during the period that you have an active business relationship with us, and thereafter for the period that is necessary to fulfil the purposes of our processing.

Processing for certain purposes is ended and the information deleted shortly after our business relationship has ended. For other processing activities the processing may continue for a longer period, e.g. for the purpose of us fulfilling legal requirements (such as book keeping). When our purpose with the processing is fulfilled and further processing is no longer relevant, the Personal Data will be deleted in a secure manner or anonymized so that the information no longer can be connected to you. You may receive further information in relation to specific processing activities upon request.

Your rights

When we process your Personal Data, you have certain rights under law. Please note that the exercise of these rights is subject to certain requirements and conditions set forth in law (mainly the GDPR).

- **Your right to be informed and your right to access**

You have the right to, free of charge, upon written request receive information about what Personal Data we process relating to you and how your Personal Data is used and processed. You are also entitled to receive a copy of the Personal Data that we process in relation to you.

- **Your right to rectification**

In the event that you consider any Personal Data that we process about you to be inaccurate or incomplete, you have the right to request that we correct or remove the data in question.

- **Your right to erasure**

You have the right to request the erasure of your Personal Data under certain circumstances (set forth in the GDPR), e.g. if the processing is based on your consent or an agreement which you chose to terminate. This right does not apply to Personal Data that we are obligated under law to continue to process.

- **Your right to restrict processing**

You have the right to request the restriction of processing of your Personal Data. If you request us to restrict our processing of your Personal Data, it may lead to us not being able to fulfill our potential obligations towards you for the time period the restriction applies.

- **Your right to data portability**

Under certain circumstances (set forth in the GDPR) you have the right to receive your

Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format. Provided that it is technically feasible, you may also have the right to request that Personal Data is transmitted directly from us to another controller.

▪ **Your right to object**

You may at any time object to our processing of your Personal Data if you consider that we lack a lawful basis for the processing or if any processing is contradictory to the original purpose.

▪ **Your right to file a complaint**

If you consider that your Personal Data is being processed in violation of applicable data protection laws you are entitled to, at any time, file a complaint with the relevant supervisory authority (in Sweden Datainspektionen).

Contact

If you have any questions regarding our processing of your Personal Data you are welcome to contact us. Contact information is set out below. If you are not satisfied with our response to your enquiry you are entitled to file a complaint with the supervisory authority (in Sweden Datainspektionen).

A request to SCA concerning Personal Data shall be sent to SCA's data protection manager and the data protection management group via e-mail gdpr@sca.com.

Changes to this notice

SCA may change and update this privacy notice. In the event of material changes or if existing information is to be processed in any other way than stated herein, SCA will provide information about such changes in an appropriate manner.