



# Privacy Notice Customer Contacts



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## 1. Introduction

In the framework of its business operations, SCA processes personal data relating to its customers and potential customers as well as other business contacts. We always take care to process personal data in a responsible and correct manner in accordance with applicable laws and regulations, such as the EU General Data Protection Regulation (GDPR).

In this information concerning personal data processing (the “**Information**”), you can read more about how we process personal data relating to our customer contacts (corporate customers, private forest owners and consumers).

## 2. Data controller

The SCA Group consist of several companies and operations. Each SCA company is the controller in relation to the processing of personal data within the framework of the business relationship between the SCA company and the company for which you are the contact person or representative, or between the SCA company and you as a private forest owner or consumer. The company that you have contact with within the SCA Group is thus the sender of this Information to you.

The designations “we”, “our” and “us” below pertain to the specific company within the SCA Group.

## 3. For what customer contacts do we process personal data?

We process personal data in relation to the following categories of customers, all of whom come into contact with our marketing and sales organization at SCA:

1. **Contact person at a potential corporate customer**, meaning we process personal data regarding the contact person or representative of a company that could be interested in buying products and services from SCA. See further details of our processing of personal data in relation to corporate customers in Section 4.
2. **Contact person at a corporate customer**, meaning we process personal data regarding the contact person or representative of a company that has an ongoing business relationship with SCA. See further details of our processing of personal data in relation to corporate customers in Section 5.
3. **Private forest owner**, meaning that you have a business relationship with us in your capacity as a private forest owner. See further details of our processing of forest owners’ personal data in Section 6.
4. **Consumer**, meaning you are a customer of ours in your capacity as a private individual. See further details of our processing of consumers’ personal data in Section 7.

In this Information, you can read all about our personal data processing in relation to the above categories of customer contacts. To enable you to easily find information regarding the processing of your personal data, we have divided the information below into each customer category and it is thus sufficient that you read the section stated above for each customer category. If, for example, you are a contact

person for an active corporate customer and want to know more about our processing of your personal data, it is sufficient for you to read Section 5 below.

## 4. Our processing of your personal data as a contact person at a potential corporate customer

### 4.1. Which personal data do we process about you?

We may process the following personal data about you as a contact person or representative of a potential corporate customer:

- name,
- contact information (such as address, e-mail address and telephone number),
- role/title,
- information on the company you work for, and
- information that you provide to us (via our contact form, e-mail correspondence, registration for an event, etc.).

In the event that we do not receive the above mentioned personal data directly from you, we gain access to such data through other business contacts or public sources, such as websites or similar.

### 4.2. Why and on what legal basis do we process your personal data?

#### **For marketing and campaigns**

We process your name and contact information for the purpose of contacting you and offering and marketing our goods and services to you using various methods of direct marketing by e-mail and post, including newsletters, our newspapers, invitations to events and price offers.

The legal basis for processing your personal data in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to market the products and services that we believe your company may be interested in. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your privacy on the basis of the potential benefits that the marketing offers for our customer contacts. If you have nonetheless declined marketing from us, we will not send any marketing to you.

#### **To be able to conduct customer events**

We process your name, contact information, information about the company you represent and any information on food preferences and other requirements that you submit to us when registering with the aim of being able to conduct various customer events, such as meetings, training courses, dinners, conferences and similar customer activities. The legal basis for processing your personal data in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to conduct customer events with your participation. Our interest in processing your personal data for this

purpose takes precedence over your potential interest in protecting your privacy on the basis of the potential benefits that customer events offer for our business contacts.

#### **To administer the contact form on [www.sca.com](http://www.sca.com)**

We process your name, contact information and information about the company you work for with the aim of being able to manage inquiries that are submitted using the contact form on SCA's website and to be able to follow up on inquiries over time. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to administer or follow up on inquiries from our potential corporate customers regarding the performance of services in one of the SCA Group's areas.

#### **To follow up contacts and establish new business relationships**

We process your name, contact information and information about the company you work for in a customer register with the aim of being able to follow up our contacts with you during a relevant period. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to follow up contacts with potential corporate customers and thereby establish new business relationships.

## **5. Our processing of your personal data as a contact person at a corporate customer**

### **5.1. Which personal data do we process about you?**

We may process the following personal data about you as a contact person or representative of a corporate customer:

- name,
- contact information (such as address, delivery address, e-mail address and telephone number),
- role/title,
- information on the company you work for,
- details of agreed content (meaning your customer agreement), orders and other information related to your potential contacts with SCA,
- details of your evaluation or assessment of SCA from customer surveys,
- information that you provide to us (via our contact form, e-mail correspondence, etc.), and
- accounting information.

In the event that we do not receive the above mentioned personal data directly from you, we gain access to such data through the company you work for, other business contacts or public sources, such as websites or similar.

### **5.2. Why and on what legal basis do we process your personal data?**



### **For marketing and campaigns**

We process your name and contact information for the purpose of contacting you and offering and marketing our goods and services to you using various methods of direct marketing by e-mail and post, including newsletters, our newspapers, invitations to customer events and price offers.

The legal basis for processing your personal data in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to market products and services to the company that you represent. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your privacy on the basis of the potential benefits that the marketing offers for our customer contacts. If you have nonetheless declined marketing from us, we will obviously not send any marketing to you.

### **To be able to conduct customer events**

We process your name, contact information, information about the company you represent and any information on food preferences and other requirements that you submit to us when registering with the aim of being able to conduct various customer events, such as meetings, training courses, dinners, conferences and similar customer activities. The legal basis for processing your personal data in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to conduct customer events with your participation. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your privacy on the basis of the potential benefits that customer events offer for our customer contacts.

### **To administer the contact form on [www.sca.com](http://www.sca.com)**

We process your name, contact information and information about the company you represent with the aim of being able to manage inquiries that are submitted using the contact form on SCA's website and to be able to follow up on inquiries over time. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to administer or follow up on inquiries from our customer contacts regarding the performance of services in one of the SCA Group's areas.

### **To be able to maintain contacts, enter into and manage agreements, and otherwise manage the customer relationship**

We process your name, contact information and information about the company you work for in a customer register with the aim of being able to maintain contact with you as the contact person for a corporate customer and manage measures relating to the customer relationship and agreements entered into.

We also process your name, contact information and information about the company you work for in order to establish agreement documentation regarding what has been agreed between the company you



represent and SCA. Such personal data is also processed to be able to send an order confirmation and manage information and invoicing in connection with the sale.

To the extent that e-mail correspondence contains personal data, we process this data to maintain or establish business relationships and to enable internal and external communication.

The legal basis for processing your personal data in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to manage an existing business relationship with the company you represent.

#### **For managing claims on goods and services**

We process your name, contact information, information on your orders, your payment history and other details related to your contacts with SCA for the purpose of addressing any eventual complaints about goods and services. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to manage complaints about goods and services.

#### **To be able to investigate customer satisfaction and improve our operations**

We process your name, contact information, information about the company you represent and details of your evaluation or assessment of SCA for the purpose of surveying customer satisfaction among our corporate customers. Our customers' evaluation and assessment of SCA is also a key factor in enabling us to continuously improve our business. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to survey customer satisfaction and develop and improve our operations.

#### **For accounting purposes**

For accounting purposes, we process details about the transaction that has occurred between us and the corporate customers for the orders made. For this reason, we may process the name and contact details that appear on the invoice or in other accounting documentation. The legal basis for our processing of your personal data for this purpose is that it is necessary to complete SCA's legal obligation.

## 6. Our processing of your personal data as a private forest owner

### 6.1. Which personal data do we process about you?

We may process the following personal data about you as a forest owner:

- name,
- contact information (such as address, delivery address, e-mail address and telephone number),
- information about your forest holding and your property (such as property designation, county, product (ha), quality, total production capacity, status regarding any felling needs and similar information with a direct connection to your property and forest holding), details of agreed content (meaning the customer agreement between you and SCA),
- information on your orders, payment history and other details related to your contacts with SCA,
- details of your evaluation or assessment of SCA from customer surveys,
- information that you provide to us (via our contact form, e-mail correspondence, etc.), and
- accounting information.

In the event that we do not receive the above mentioned personal data directly from you, we gain access to such data through public registers, particularly the Real Property Register (Sw: Lantmäteriet).

### 6.2. Why and on what legal basis do we process your personal data?

#### **For marketing and campaigns**

We process your name, contact information and, in certain cases, information about your forest holding for the purpose of being able to market relevant forest products and services to you as a private forest owner through, for example, invitations and other targeted mailings. We may also use Facebook and Google Ads to advertise to the target group of private forest owners that we believe could be interested in our marketing offering. The legal basis for processing your personal data in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to market products and services to you. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your privacy on the basis of the potential benefits that marketing offers for our customer contacts. If you have nonetheless declined marketing from us, we will obviously not send any marketing to you.

#### **To be able to conduct customer events**

We process your name, contact information and, in certain cases, details of your forest holding as well as any information on food preferences and other requirements that you submitted to us when registering with the aim of being able to conduct various customer events, such as meetings, training courses, dinners, conferences and similar customer activities. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to conduct customer events with you as a private forest owner. Our interest in processing your personal



data for this purpose takes precedence over your potential interest in protecting your privacy on the basis of the potential benefits that customer events offer for our customer contacts.

**To administer the contact form on [www.sca.com](http://www.sca.com)**

We process your name, contact information and information about you as a private forest owner with the aim of being able to manage inquiries that are submitted using the contact form on SCA's website and to be able to follow up on inquiries over time. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to administer or follow up on inquiries from our customer contacts regarding the performance of services in one of the SCA Group's areas.

**To be able to maintain contacts, enter into and manage agreements, and otherwise manage our business relationship**

We process your name, contact information and information about you as a private forest owner in a customer register with the aim of being able to maintain contact with you as a private forest owner and manage measures relating to our business relationship.

We also process your name, contact information and information about you as a private forest owner as well as information about your forest holding for the purpose of establishing agreement documentation regarding what has been agreed between you and SCA, entering into agreements and managing the fulfillment of agreements with you (also online). Such personal data is also processed to be able to send an order confirmation and manage information and invoicing in connection with the delivery of our forest products and services to you.

To the extent that e-mail correspondence contains personal data, we process this data to maintain or establish business relationships and to enable internal and external communication.

The legal basis for processing your personal data in this case is to enable the agreement with you to be entered into and fulfilled as well as a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to manage an existing business relationship with you.

**To meet requirements linked to land balance and application for an acquisition permit in accordance with the Land Acquisition Act (1979:230)**

SCA processes information linked to our agreement with you and your property in order to maintain and maintain SCA's list of SCA's so-called market balance. This list is also included in the documentation that we submit to the County Administrative Board with an application for an acquisition permit in accordance with the Land Acquisition Act prior to new acquisitions of forest properties. The personal data covered by this processing are: name, address, date of agreement, county, municipality, property designation, product (ha), quality, total production capacity.

The legal basis for our processing of personal data in this part is that we must have the opportunity to fulfill a legal obligation incumbent on SCA according to the Land Acquisition Act (1979: 230) to apply for an acquisition permit with the County Administrative Board, and a balance of interests, where SCA assesses that the processing is necessary to enable SCA to have continuously updated documentation to prove the soil balance.

**For managing claims on goods and services**

We process your name, contact information, information on your orders, your payment history and other details related to your contacts with SCA for the purpose of addressing any complaints about goods and

services. The legal basis for processing your personal data in this case is that it is necessary to enable us to fulfill our agreement with you as a private forest owner.

### **To be able to investigate customer satisfaction and improve our operations**

We process your name, contact information, information about you as a private forest owner and details of your evaluation or assessment of SCA for the purpose of surveying customer satisfaction among our customer contacts. Our customers' evaluation and assessment of SCA is also a key factor in enabling us to continuously improve our business. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to survey customer satisfaction and develop and improve our operations.

### **Skogsvinge**

We process details of your forest holding based on information from public registers (such as information on the property, mortgages, owner, rights and associations, etc.) for the purpose of being able to analyze your forest holding, but also to be able to offer you as a private forest owner access to our analyses and collated information about your forest holding by logging in to our digital service, Skogsvinge. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in compiling and analyzing information related to forest holdings based on public registers (Sw: Lantmäteriet).

## **7. Our processing of your personal data as a consumer (private individual)**

### **7.1. Which personal data do we process about you?**

We may process the following personal data about you as a consumer (private individual):

- name,
- contact information, such as address, e-mail address and telephone number,
- personal identity number,
- information on any contacts with SCA by, for example, telephone,
- details of your evaluation or assessment of SCA from customer surveys,
- information on your orders and our agreements with you,
- accounting information, and
- information on your credit status, such as creditworthiness and any payment defaults.

In the event that we do not receive the above mentioned personal data directly from you, we gain access to such data through public registers and when conducting credit checks.

## 7.2. Why and on what legal basis do we process your personal data?

### **For marketing and campaigns**

We process your name and contact information for the purpose of contacting you and offering and marketing our goods and services to you using various methods of direct marketing by e-mail and post, including newsletters, our newspapers, invitations to events and price offers. We send marketing mailings to consumers that have an existing customer relationship with SCA and to private individuals that we believe could be interested in buying goods and services from SCA.

The legal basis for processing your personal data in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to market products and services to you. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your privacy on the basis of the potential benefits that marketing offers for our customer contacts. If you have nonetheless declined marketing from us, we will obviously not send any marketing to you.

### **To be able to conduct customer events**

We process your name, contact information and any information on food preferences and other requirements that you submitted to us when registering with the aim of being able to conduct various customer events, such as meetings, training courses, dinners, conferences and similar customer activities. We invite consumers that have an existing customer relationship with SCA and consumers that we believe could be interested in participating in our customer events. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to conduct customer events with you as a participant. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your privacy on the basis of the potential benefits that customer events offer for our customer contacts. If you have nonetheless declined marketing from us, we will obviously not send any marketing to you.

### **To administer the contact form on [www.sca.com](http://www.sca.com)**

We process your name and contact information with the aim of being able to manage inquiries that are submitted using the contact form on SCA's website and to be able to follow up on inquiries over time. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to administer or follow up on inquiries from our customer contacts regarding the performance of services in one of the SCA Group's areas.

### **For the management of customer relationships, managing orders, credit checks and agreements, etc.**

We process your name, contact information, personal identity number and information on your orders and agreements with us for the purpose of managing your orders (including preparing and sending order confirmations and issuing notices regarding order status and delivery problems as well as providing



support and answering questions from you), conducting credit checks to find out whether or not we can sell to you on invoice, and otherwise fulfilling our obligations to you as a consumer.

To the extent that e-mail correspondence contains personal data, we process this data to maintain or establish business relationships and to enable internal and external communication.

The legal basis for processing your personal data in this case is to enable the agreement with you to be entered into and fulfilled as well as a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to manage an existing business relationship with you.

#### **For managing claims, returns, etc.**

We process your name, contact information and information on your orders and agreements with us for the purpose of managing any request to return products or to exercise your consumer rights to claim an error and delay on our part. The legal basis for processing in this case is that it is necessary to enable us to fulfill our agreement and to complete our legal obligations in accordance with applicable consumer legislation.

#### **To be able to investigate customer satisfaction and improve our operations**

We process your name, contact information, information about you as a consumer and details of your evaluation or assessment of SCA for the purpose of surveying customer satisfaction among our customer contacts. Our customers' evaluation and assessment of SCA is also a key factor in enabling us to continuously improve our business. The legal basis for processing in this case is a legitimate interest, meaning that processing is necessary for our legitimate interest in being able to survey customer satisfaction and develop and improve our operations.

#### **Hunting and fishing**

We process your name and contact information for you as a consumer for the purpose of being able to offer the purchase of a one-day permit for small game hunting and fishing on our land. The legal basis for processing in this case is that it is necessary to enable us to fulfill our agreement with you as a consumer or to take measures before such an agreement is entered into.

#### **Lögdö Wild**

We process your name and contact information for you as a consumer for the purpose of offering the booking of cottages and campsites in the wilderness. Bookings are managed on the website <https://logdowild.se/>. The legal basis for processing in this case is that it is necessary to enable us to fulfill our agreement with you as a consumer or to take measures before such an agreement is entered into.

#### **For accounting purposes**

For accounting purposes, we process details about the transaction that has occurred between us and you. For this reason, we will process the personal data that needs to be included in invoices and other accounting documentation. The legal basis for processing in this case is that it is necessary to complete SCA's legal obligation.

## 8. Deliveries of pellets

SCA makes deliveries of pellets on behalf of distributors. In these cases, it is the distributor from whom you bought the pellets that is the data controller and is able to respond to any questions you may have concerning the processing of your personal data.

## 9. To whom do we forward personal data and where do we process personal data geographically?

We may give out your personal data if the need arises in conjunction with one of the following situations:

- a) We may disclose your personal data to other companies in the SCA Group. Your personal data may also be disclosed to and processed by third parties outside the SCA Group, such as to our cooperative partners and to our service providers who process personal data on our behalf, so-called processors. We have contracts with our processors that ensure that they process your personal data in accordance with this Information and our instructions. Examples of third parties to whom we may disclose your personal data include transport companies in connection with the delivery of goods, media agencies for the distribution of marketing mailings and legal advisors.
- b) We may disclose your personal data to authorities, such as the National Land Survey, the County Administrative Board and the Swedish Tax Agency, to fulfill a legal obligation incumbent on us or to enable an application for a permit or deduction in which information containing personal data linked to you must be submitted. An example of such a situation is when we apply for an acquisition permit with the County Administrative Board in accordance with the Land Acquisition Act (1979: 230).
- c) We may also share your personal data with third parties to permit a merger, an acquisition or a sale of all or part of SCA's assets.

As a general rule, SCA and SCA's cooperative partners process your personal data only within the EU and EEA. If personal data is processed outside the EU and EEA, SCA will take measures to ensure that the data remains equally secure and also take the measures required to legally transfer personal data to countries outside the EU and EEA.

## 10. How long do we process your personal data for the different purposes?

SCA will not keep your personal data for longer than necessary, taking into account the purpose for they were was collected. Therefore, we regularly delete personal data that is no longer needed.

Personal data processed by SCA to ensure that we can offer our goods and services to our customer contacts, or that we process to manage customer relationships and sales, is processed as long as you or the company for which you are a contact person are customers of SCA.

Some personal data ceases to be necessary for SCA during the ongoing customer relationship and some in direct connection with the customer relationship ending, while SCA must store other information for a shorter or longer time period if required in order to fulfill legal or tax requirements, official decisions, accounting requirements, etc.

The time period for which we process your personal data for marketing purposes depends on whether you have given your consent for processing or if such processing is carried out on the basis of a legitimate interest (which is usually the case). If you have consented to receive direct marketing, newsletters and catalogs from us, we will process your personal data until you deregister, withdraw the consent you have given (see Section 11.6 below) or otherwise ask us to stop contacting you for this purpose.

In the vast majority of cases in which we process data for marketing purposes on the basis of a legitimate interest, we will, in as far as you have an existing business relationship with SCA, process your personal data for marketing purposes for a year after your customer relationship with us ceases. However, you can always request that we stop processing personal data for this purpose earlier than this. If you do not have an existing business relationship with SCA and have not expressed that you want to receive marketing from us, we will process your personal data for three months from the time of obtaining your contact information. However, we may obtain the data again and then send further marketing mailings to you.

If you want more information about the period during which we process your data, please contact us for additional information, see the contact details to SCA in Section 12 below.

## 11. Your rights

When we process your personal data, you have certain legal rights. Note that the exercise of these rights is subject to certain requirements and conditions as specified in the General Data Protection Regulation (GDPR).

### 11.1. Your right to information and access

You are entitled, without cost, to request in writing information about the personal data we process in relation to you. If your request is unfounded or excessive, for example if you often request extracts or erasure and at frequent intervals, we may either reject your request, or charge a fee that covers the administrative costs arising for us from your request.

## **11.2. Your right to rectification and erasure**

If your personal data is inaccurate or incomplete, you have the right to request that we rectify or supplement such personal data.

You have the right to request erasure of your personal data in certain circumstances that are described in the General Data Protection Regulation (GDPR). Provided that your request falls within one of these circumstances, we will erase your data.

## **11.3. Your right to request restrictions**

Under certain circumstances as specified in the General Data Protection Regulation (GDPR), you have the right to request restriction of processing. Where you have this right, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

## **11.4. Your right to data portability**

You have the right in a structured, commonly used and machine-readable format to receive the personal data about you that you have provided and have the right to transmit this data to another controller when such a transfer is technically possible.

## **11.5. Your right to object to direct marketing**

You can object at any time to your personal data being processed for direct marketing. If you do not want us to process your personal data for this purpose, we ask that you inform using the contact information presented below, see Section 12. We will then stop processing your personal data for this purpose and remove the data, provided that we do not need to process the data for any other purpose according to this Information.

## **11.6. Your right to withdraw your consent**

If we process your personal data based on your consent, you may at any time, fully or partially, withdraw your consent by contacting us, see our contact information in Section 12. If you withdraw your consent, we ask you to note that this does not affect the legality of the processing that took place earlier on the basis of the consent before it was withdrawn. SCA may also have another legal basis for processing your personal data (see our statement above under each purpose) and we may therefore be entitled to continue processing your personal data.



## 11.7. Your right to lodge a complaint

If you are dissatisfied with how we have processed your personal data, we ask that you contact us, see our contact details in Section 12. You also have the right to submit a complaint about our personal data processing to:

The Swedish Authority for Privacy Protection, PO Box 8114, SE-104 20 Stockholm, Sweden, or by e-mail: [imy@imy.se](mailto:imy@imy.se).

## 12. Contact SCA

You can contact us in the following way:

- by e-mail [gdpr@sca.com](mailto:gdpr@sca.com)
- by telephone on +46 60 19 33 30 (Switchboard). Ask for Head of Administration GDPR or Legal Counsel.