



Privacy Notice – Shareholders



Contents

| | |
|--------------------------------------------------------------------------------------------------------|---|
| 1. Data controller | 3 |
| 2. Categories of persons about whom SCA processes personal data..... | 3 |
| 3. Our processing of your personal data as a shareholder (private person)..... | 4 |
| 3.1. Which personal data do we process about you?..... | 4 |
| 3.2. Why and on what legal basis do we process your personal data? | 4 |
| 4. Our processing of your personal data as representative of a legal person who is a shareholder | 6 |
| 4.1. Which personal data do we process about you?..... | 6 |
| 4.2. Why and on what legal basis do we process your personal data? | 6 |
| 5. To whom do we forward personal data and where do we process personal data geographically?..... | 7 |
| 6. For how long do we process your personal data for the different purposes? | 8 |
| 7. Your rights | 8 |
| 7.1. Your right to information and access | 8 |
| 7.2. Your right to rectification and erasure | 8 |
| 7.3. Your right to request restrictions..... | 8 |
| 7.4. Your right to data portability..... | 9 |
| 7.5. Your right to lodge a complaint..... | 9 |
| 8. Contact SCA..... | 9 |

1. Data controller

Svenska Cellulosa Aktiebolaget SCA, corporate identity number 556012-6293, processes personal data regarding its shareholders and representatives for companies that are shareholders. We are always careful 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 about privacy protection (the “**Information**”), you can read more about how we process personal data relating to our shareholders.

The designations “we”, “our” and “us” below pertain to Svenska Cellulosa Aktiebolaget SCA.

2. Categories of persons about whom SCA processes personal data

We process personal data about the following categories of persons covered by this Information:

1. **Shareholders (private person)**. See further details of our processing of personal data in relation to you as shareholder in Section 3.
2. **Representatives for legal persons who are shareholders**, which means we process personal data about the representative or contact person for the legal person who is a shareholder in SCA and other persons who contact SCA in connection with general meetings of shareholders. See further details of our processing of personal data in relation to representatives of legal persons who are shareholders in Section 4.

In this Information, you can read all about our personal data processing for the above categories of persons. To enable you to easily find information regarding the processing of your personal data, we have divided the information below into each category of person and it is thus sufficient that you read the section stated above for each category of persons. If, for example, you are a representative for a legal person who is a shareholder and want to know more about our processing of your personal data, it is sufficient for you to read Section 4 below.

3. Our processing of your personal data as a shareholder (private person)

3.1. Which personal data do we process about you?

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

- name,
- contact information (such as address, e-mail address and telephone number),
- personal identity number,
- shareholdings,
- number of votes, voting rights and other rights connected to your shareholding
- shareholder assistant,
- shareholder representative,
- notes in minutes of general meeting,
- visual material and/or audio recordings (such as recordings during a general meeting)
- other information you make available to us (such as via e-mail, notifications to a general meeting, request to address a specific matter at a general meeting and other communication)

If we do not collect the personal data listed above from you directly, we can obtain it through Euroclear Sweden AB, which manages our shareholders' register. Euroclear Sweden AB is responsible for the personal data processing that occurs in conjunction with managing SCA's shareholders' register. Otherwise, we can obtain access to your personal data from the person who is your agent or from public registers and sources.

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

Managing the shareholders' register

To the extent that Euroclear Sweden AB provides us with information from the shareholders' register, which applies ahead of an annual general meeting, for example, we process name, contact details, personal identity number, shareholding and number of votes to take measures related to the management of the shareholders' register, for instance that we receive a request from a shareholder to present certain information from the shareholders' register. The legal basis for processing in this case is a legal obligation, i.e. we must process your personal data to meet our legal obligations.

Preparing and publishing information ahead of a general meeting

We process name, shareholding, number of votes and in certain cases visual material in order to show our ten largest shareholders on SCA's website. We do this to fulfill our contractual obligations toward the marketplaces where our shares are traded. 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 publish



information related to shareholdings in SCA. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your personal privacy.

Managing and conducting general meetings and related issues

We process all personal data listed above under Section 3.1 to manage and conduct general meetings (scheduled, extended or extraordinary), including the administration connected with the general meeting and related issues, such as voting, dividends and whether you are a direct or nominee-registered shareholder. The legal basis for processing in this case is a legal obligation, i.e. we must process your personal data to meet our legal obligations.

In advance of a general meeting of SCA, you will receive additional information about how we process your personal data in conjunction with the general meeting. Such additional information is a supplement to this Information.

Holding events

We process 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 events and similar activities with shareholders. 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 events with you as shareholder. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your personal privacy on the basis of the potential benefits that events offer for our shareholders.

Communicating news about SCA's operations, etc.

We process name and contact details in order to communicate news about our operations, including interim reports, annual reports and mailings, such as newsletters. We may also process name and contact details in order to manage other communication with you as shareholder. 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 communicate news about SCA's operations to you as shareholder. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your personal privacy.

Managing inside regulations

We process name, contact details, personal identity number, shareholding and number of votes about shareholders discharging managerial responsibilities at SCA and/or with access to inside information in order to maintain an insider logbook. The legal basis for processing in this case is a legal obligation, i.e. we must process your personal data to meet our legal obligations.

4. Our processing of your personal data as representative of a legal person who is a shareholder

4.1. Which personal data do we process about you?

We may process the following personal data about you as representative or contact person for the legal person who is a shareholder and you who otherwise contacts SCA in connection with general meetings of shareholders:

- name,
- contact information (such as address, e-mail address and telephone number),
- personal identity number,
- notes in minutes of general meeting,
- visual material and/or audio recordings (such as recordings during a general meeting)
- other information you make available to us (such as via e-mail, notifications to a general meeting, request to address a specific matter at a general meeting and other communication)

If we do not collect the personal data listed above from you directly, we can obtain it through Euroclear Sweden AB, which manages our shareholders' register. Euroclear Sweden AB is responsible for the personal data processing that occurs in conjunction with managing SCA's shareholders' register. Otherwise, we can obtain access to your personal data from public registers and sources.

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

Managing and conducting general meetings and related issues

We process all personal data listed above under Section 4.1 to manage and conduct general meetings (scheduled, extended and extraordinary), including the administration connected with the general meeting and related issues, such as voting, dividends and whether the shareholder you represent or are contact person for is a direct or nominee-registered shareholder. The legal basis for processing in this case is a legal obligation, i.e. we must process your personal data to meet our legal obligations.

In advance of a general meeting of SCA, you will receive additional information about how we process your personal data in conjunction with the general meeting. Such additional information is a supplement to this Information.

Holding events

We process 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 events and similar activities with shareholders. 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 events with you as contact person or representative for a shareholder. Our interest in processing your personal



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

Communicating news about SCA's operations, etc.

We process name and contact details in order to communicate news about our operations, including mailings, such as newsletters. We may also process name and contact details in order to manage other communication with you as representative or contact person for a legal person who is a shareholder. 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 communicate news about SCA's operations to you as contact person or representative for a shareholder. Our interest in processing your personal data for this purpose takes precedence over your potential interest in protecting your personal privacy.

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

We may supply your personal data to other companies in the SCA Group. Your personal data may also be supplied 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 personal data 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 distribute your personal data are legal advisors and public authorities.

We may also share your personal data 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.

6. For how long do we process your personal data for the different purposes?

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

Personal data processed by SCA to complete its legal obligations, for example to comply with legal requirements in accordance with the Swedish Companies Act (2005:551) and Accounting Act (1999:1078), are processed for the time we have these legal obligations and commitments to you.

Personal data processed by SCA for the purpose of distributing newsletters about our operations are processed for as long as you wish to receive such a newsletter.

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 8 below.

7. 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).

7.1. 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.

7.2. 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.

7.3. 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.

7.4. 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.

7.5. Your right to lodge a complaint

If you are dissatisfied with how we have processed your personal data, we ask that you contact us, refer to our contact details in Section 8. You also have the right to submit a complaint about our personal data processing to:

Integritetsskyddsmyndigheten

Box 8114

SE-104 20 Stockholm

E-mail: imy@imy.se

8. Contact SCA

You can contact us in the following way:

- by e-mail gdpr@sca.com
 - by telephone: +46 (0)60 19 33 30 (switchboard), Ask for Head of Administration GDPR or Legal Counsel
-