



Privacy Notice - General

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1. Background and objectives

Svenska Cellulosa Aktiebolaget SCA and its Group companies, referred to here as “SCA” or “we”, collect and use personal data in their operations. We are protective of the privacy of our employees, customers and other business contacts and ensure that we comply with the applicable data protection regulations, including the General Data Protection Regulation (GDPR), in all countries where SCA conducts operations.

SCA continuously takes the necessary steps to ensure that your personal data are processed in accordance with the applicable data protection legislation and accepted market practice.

The purpose of this General Privacy Notice is to provide an overview of how SCA works with GDPR. Special documents with more detailed privacy protection information, which could be relevant to you depending on the role you have and the context in which you come into contact with SCA, are published on SCA's external website and on SCA's intranet.

As a starting point, each company in the SCA Group is the data controller for its processing of personal data. Depending on the operation to which the personal data processing is attributable, the data controller responsibility may be assigned to various companies within the SCA Group.

Under section 19 below, you can find the contact information for our GDPR management organization. You are always welcome to contact the management organization if you have questions related to SCA's processing of personal data.

2. What is the processing of personal data?

Personal data refers to all types of information that, directly or indirectly, independently or in combination with other information, can be associated with a living person. This may be name, address or personal identity number. Photos of people are also classified as personal data. Sound recordings that are stored in digital form may also be personal data, even if no names are given on the recording. A corporate registration number is often not a personal identity number, but may be if pertaining to a sole proprietorship.

The processing of personal data is “any operation which is performed on personal data”, such as collection, storage, processing, use for various purposes, the change or destruction of personal data.

This entails that processing of personal data occurs in all companies' operations. SCA would not be able to conduct its operations without processing personal data. In many cases, SCA even has obligations to process personal data. It is important that the processing of personal data is always lawful and complies with existing regulations, such as GDPR. In this notice, you can read more about how SCA safeguards this within its operations.

3. SCA always complies with basic principles

In this section, we have collected the basic principles that are always observed by SCA in the processing of personal data.

3.1. Lawfulness, fairness, transparency

Personal data must always be processed lawfully, fairly and in a transparent manner in relation to the data subject (that is, the individual person).

This entails, for example, that SCA bases each case of processing on a valid legal basis, such as processing that is required to perform a contract with the data subject or to meet a legal obligation. You can read more about legal basis in section 4.

The transparency requirement means that SCA must provide clear and transparent information on the processing of personal data to those affected. SCA does this, for example, by publishing and providing information about documents containing privacy protection information.

3.2. Purpose limitation

Personal data may only be collected and used for explicit purposes (reasons), and not further processed in a manner that is incompatible with those purposes. SCA ensures this by identifying and documenting the purposes of the activities in using various personal data.

3.3. Data minimization

Personal data that are processed must be adequate, relevant and limited to what is necessary in relation to the purposes. SCA ensures that the data collected are actually required. SCA does not request information merely because it could be useful to have it. SCA does not use personal data for any other purpose than the one for which they were originally collected.

3.4. Accuracy

Personal data that are processed must be accurate and, where necessary, kept up to date. SCA takes appropriate action to ensure that incorrect or incomplete data are erased or rectified. SCA avoids storing copies of data in multiple systems so that incorrect sources and information that is not up to date are not stored and used in the operations.

3.5. Storage limitation

Personal data may only be processed during the time required for the objective of processing (purpose) to be met. SCA does not store or use data for longer than is necessary for the purposes for which the personal data are processed. The same data may be used for different purposes over periods of time of varying length. For example, data may be contained in SCA's accounting for a long time, but may not be used for marketing.

When the data are no longer required, SCA removes them in stages, which means that they are either erased or anonymized.

3.6. Accountability

The principle of accountability entails that SCA must be able to demonstrate compliance with the General Data Protection Regulation (GDPR). Accordingly, SCA documents implemented and planned processes and measures pertaining to data protection matters.

3.7. Record

SCA documents and maintains records of the processing of personal data conducted in the operations.

3.8. Sensitive data

Certain personal data is, by its nature, particularly sensitive and for this reason, has stronger protection, so-called sensitive data. As a core rule, it is prohibited to process sensitive data, but there are exceptions. SCA takes special technical and organizational security measures regarding sensitive data. The processing of sensitive data can, for example, involve information about health, which are primarily managed by SCA's HR unit and SCA Health.

4. Legal basis

All personal data processing must have a legal basis to be permissible. According to the General data Protection Regulation (GDPR), the legal bases that apply for SCA are:

- *Performance of a contract*, that is, that the processing is necessary for SCA to be able to perform a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract. Examples of this are SCA's contracts with employees and customers who are private individuals.
- *Compliance with a legal obligation*, meaning that the processing is necessary to comply with a legal obligation to which SCA is subject according to law. An example is when SCA must save accounting information for a period of at least seven years to meet legal requirements under the Swedish Accounting Act.
- *Legitimate interest*, this means that processing is necessary for purposes that relate to the interests of SCA or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. When SCA uses legitimate interest as a legal basis for processing personal data, SCA documents the assessment that has been made. An example is that SCA processes contact information for potential business contacts on the basis of a legitimate interest.
- *Consent*, meaning that an individual has given consent to the processing of his or her personal data for one or more specific purposes. There are special requirements for consent and that must be met for consent to be valid as a legal basis, for example, that consent has been freely given. Since consent provided can be withdrawn at any time, SCA has minimized the use of consent as a legal basis.

You can read more about applicable legal bases for our processing in the documents with adapted privacy information.

5. Collection of personal data

SCA collects personal data that you provide to us voluntarily when you have contact with us, such as by e-mailing us or entering a contract with SCA. We also collect personal data during ongoing business relationships with you.

Personal data may also be generated continuously during our business relationship with you as a result of your activities, such as your participation in events at SCA, or when we perform our legal obligations as a company.

SCA also collects data if you use our online forms and by using cookies on our websites that collect information on and from your web browser. Further information on this can be found in the cookie information on the specific website.

We may also supplement data from generally available sources, including public registers, primarily the SPAR population register and Lantmäteriet's property register. In certain cases, SCA purchases information from companies that compile registers.

6. Information for the data subject

The transparency requirement entails, for example, that individuals ("data subjects") are entitled to be informed when their personal data is processed. The information must include, for example, the contact details of the data controller, the legal basis for the processing and the purpose of the processing.

SCA ensures appropriate procedures for meeting this information obligation and SCA has adopted several internal and external information documents. SCA typically provides information about SCA's personal data processing by providing or referring to documents containing information about privacy protection.

7. Processing of personal data for marketing

7.1. Description of processing and purpose

SCA processes personal data continuously with the purpose of marketing our products and services to existing and potential customers, including the provision of relevant offers. Such marketing may comprise, for example, information about SCA's operation or invitations to events or similar activities.

The personal data may also be used for analysis and follow-up of our marketing activities, either by SCA directly or through third parties on behalf of us, in order to improve our offers and generally to develop our operations. To be able to do this, we use e.g. Google Analytics on our website. The information collected is used to maintain and improve the website, measure the effectiveness of advertising, protect against fraud, abuse and customize the content and ads that you see on our website, Google and other websites. To ensure that your data is adequately protected, we have taken protective measures in the form of de-identification and pseudonymization measures. This guarantees masking of your IP address, which means that all data collected remains anonymous. Only in exceptional cases will the entire IP address be transmitted to a Google server in the United States. For more information about Google Analytics and

how your personal data is processed in connection with the service, read more about Cookie information on the website www.sca.com.

Marketing activities may also be targeted to business contacts other than existing and potential customers if we consider that the business contact is significant for SCA in some respect, such as a market organization or group of companies.

7.2. Personal data

The personal data processed for this purpose are primarily name, contact details, information regarding participation at an event and details of your relationship with SCA.

7.3. Legal basis

The legal basis for SCA's personal data processing for marketing is a legitimate interest, by which SCA, in each individual case, ensures that the fundamental rights and freedoms of our contract partners and business contacts do not override our legitimate interest in marketing activities and developing, optimizing and managing our operations.

As far as marketing is concerned, the same legal basis is applied whether the data subject is covered by marketing in their role as company representative or as an individual forest owner/businessperson.

7.4. Deregistration

You have the possibility at all times to request deregistration of your data that is used for marketing. Such deregistration entails that your data, if there is no legal requirement preventing such sorting, will be erased and no longer used for marketing purposes. If you no longer wish to be included in marketing activities from an SCA company, you can deregister using gdpr@sca.com.

8. Handling complaints from the public

SCA processes personal data for the purpose of managing complaints from the public relating to our industries' operations, such as any gas emissions, odors and fiber dispersion. When we have received a complaint, we need to save the person's contact information to be able to document the complaint and be able to reply to the person if necessary.

9. Contact persons on website

If you are a contact person for services offered on SCA's website, such as a contact person for questions and purchases relating to hunting and fishing, we process your personal data in the form of name and contact information by providing them on the website. The legal basis for our processing is a legitimate interest, with that legitimate interest being the ability to effectively offer hunting and fishing services to consumers via our website.

10. Processing of personal data in event of GDPR request

10.1. Description of processing and purpose

SCA processes personal data to manage requests in accordance with GDPR, such as, for example, requests for register extracts or corrections. SCA could process the data for a period of a year from when the request is made for the purpose of being able to process a new request from the same person or to demonstrate compliance with GDPR.

10.2. Personal data

The personal data processed for this purpose are primarily name, contact details, information on the request itself and information about SCA's handling of the request.

10.3. Legal basis

The legal basis for SCA's personal data processing to handle requests according to GDPR is partly the completion of legal obligation (to handle the request) and partly a legitimate interest, by which SCA's legitimate interest of being able to follow up on requests made and to defend itself against any claims of incorrect handling overrides the interests of the individual that their data not be processed.

11. Data subject's rights

As an individual, you have certain rights in relation to SCA when SCA processes your personal data. SCA has established internal procedures and guidelines, as well as an internal organization, to ensure that individuals are able to exercise their rights in accordance with GDPR. More information about these rights are contained in the documents with privacy protection information that are published on sca.com/gdpr.

12. Security measures

SCA processes personal data in such a manner that ensures appropriate security for personal data, including for the purpose of preventing personal data breaches. This is achieved through technical and organizational action within the SCA Group. The level of security measures is assessed in relation to the risks with and type of personal data processing. Organizational security measures may be, for example, that SCA uses authorization controls and log systems for the IT systems that contain personal data and shell protection for entering and leaving SCA's premises. Technical security measures may be, for example, that SCA has adequate protected wireless networks, password protection for mobile devices and e-mail encryption as required.

13. Provision of personal data

SCA engages cooperative partners and service providers that conduct services on behalf of SCA, such as the provision of IT services, marketing services, etc. In the provision of such services, the service provider/partner may gain access to personal data. These companies may only process personal data as set forth in the processor agreement signed with us, and in accordance with the specific instructions they

receive when such an agreement is signed. They may not use your personal data for their own purposes and are required by law and contract to protect your personal data.

SCA may disclose personal data to third parties, such as the police or another authority if we are obliged to do so by law or as the result of an official decision to protect SCA's legal interests or to investigate, uncover or prevent fraud, other crimes or security problems. SCA may also disclose personal data to legal advisers, auditors or business consultants.

In the event of a dispute, it may be necessary to transmit information containing personal data to other parties to the dispute.

SCA only provides personal data to a third party when there is a legal basis for the transfer and this is motivated by internal business purposes or otherwise well-founded.

SCA has signed agreements with its data processors, including data processors in the SCA Group.

14. Transfer to third countries

As its starting point, SCA only processes personal data within the EU/EEA. The General Data Protection Regulation (GDPR) entails that all EU member states have equal protection for personal data and personal privacy, meaning that personal data can be freely transferred within the EU/EEA without restrictions.

For a country outside the EU/EEA, so-called third countries, there is no corresponding protection for personal data and privacy. In the event that SCA transfers (or provides access to) personal data to third countries, such as the United States, SCA takes measures to ensure that personal data remains equally protected and the measures required to legally transfer personal data to countries outside the EU/EEA. This can be done by entering into EU Standard Contractual Clauses with the recipient ([Link to Standard Contractual Clauses](#)). We can also take further action. Such measures are mentioned in connection with the respective treatment, see for example section 7.1.

15. SCA employees are trained in GDPR issues

At SCA, our opinion is that all employees have a responsibility to understand the applicable data protection regulations, including the General Data Protection Regulation (GDPR). SCA supports its employees by continuously holding training courses adapted to employees' actual needs in relation to the employees' position at SCA and the personal data processing in question.

16. Risk analysis and impact assessment

SCA is responsible for identifying and classifying privacy risks related to each planned processing of personal data. Accordingly, SCA conducts a risk analysis of personal data processing. Particular privacy risks for the individual's rights and freedoms may arise, for example, in the processing of sensitive data or if the processing is conducted on a large scale.

If it is likely that personal data processing could involve a high risk to an individual's rights and freedoms, an assessment is made of the effects of the planned processing on the protection of personal data.



17. GDPR management organization

SCA has a specially composed management organization for issues related to GDPR. In addition to this, specific work is conducted to a large extent in the business areas in accordance with the management organization's directives, such as updating internal special procedures and documentation.

18. Audits and regulatory compliance

Audits of SCA's regulatory compliance in relation to data protection regulations are conducted regularly and in a structured manner. SCA has established procedures for the way in which the GDPR management organization, with the help of external parties, is to conduct thorough, independent and regular evaluations of SCA's regulatory compliance. SCA has also established procedures for the implementation of gap analyses, as well as the follow-up and correction of any shortcomings identified. SCA has also adopted procedures for the way in which audit results are to be reported.

19. Contact SCA

For questions relating to this Notice, please contact SCA's GDPR management organization as follows:

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