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.

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

The purpose of this General Privacy Notice is to provide an overview of SCA's approach to GDPR.

Under section 15 below, you can find the contact information to SCA’s GDPR management Team. You are always welcome to contact us 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.

- **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 lawful ground, such as that the processing is required to fulfill a contract with the data subject or to meet a legal obligation. You can read more about the lawful grounds 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.

- **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.

- **Data minimization**
  Personal data that are processes 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.

- **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 are not up to date are not stored and used in the operations.

- **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 is 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.

- **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.
- **Record**
  SCA documents and maintains records of the processing of personal data conducted in the operations.
- **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 is primarily managed by SCA's HR function and SCA's health center SCA Hälsan.

4. Lawful grounds

All personal data processing must have a lawful ground to be permissible. According to the General data Protection Regulation (GDPR), the lawful grounds 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. This interest is weighed against the data subject's interest in privacy protection When SCA uses legitimate interest as a lawful ground 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 lawful ground, 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 lawful ground.

You can read more about applicable lawful grounds for our processing in the documents with adapted privacy information, which are published on SCA's webpage sca.com/gdpr.

5. 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 lawful ground for the processing and the purpose of the processing.

SCA ensures appropriate procedures for meeting this information obligation and 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.

6. 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. Requests are handled in accordance with SCA's instruction “Handling requests from data subjects”, which is an internal document available on SCA's intranet.

- **Right to be informed when personal data is collected**
  Information must be provided to the individual in an easily accessible written form, using clear and plain language. The General Data Protection Regulation (GDPR) sets out a number of specific requirements that must be met. These requirements vary depending on whether the personal data has been collected directly from the data subject or from a third party.
- **Right of access**
  The data subject has the right to obtain confirmation as to whether personal data concerning them is being processed and, if so, to receive a copy of that personal data. This right applies regardless of the location or system in which the personal data is processed.
- **Right to rectification**
  If personal data being processed is inaccurate or incomplete, the data subject may request rectification. If the data subject demonstrates that the purpose for which the personal data is processed is no longer lawful, necessary or reasonable in the circumstances, the personal data concerned must be erased, unless otherwise required by law.
- **Right to erasure (“the right to be forgotten”)**
  In certain cases, the data subject has the right to request the erasure of their personal data (“the right to be forgotten”). One example is where consent is the legal basis for processing and the data subject withdraws their consent.
- **Right to restriction of processing**
  In certain cases, the data subject has the right to request that SCA restrict the processing of their personal data, i.e. limit processing to certain specific purposes. This right applies, for example, when the data subject considers the data to be inaccurate and has requested rectification. The data subject may then request that processing be restricted while the responsible function verifies the accuracy of the data. The individual must be informed when the restriction is lifted.
- **Right to data portability**
  The data subject has the right to transfer personal data they have provided to SCA to another data controller if the legal basis for processing is (i) the performance of a contract or (ii) consent.

The personal data must be provided to the data subject in a structured, commonly used and machine-readable format. Where technically feasible, the data subject may request that the data be transferred directly to another data controller. This right applies only to personal data that the data subject has provided to SCA.

- **Right to object**
  The data subject has the right to object to the processing of personal data where the legal basis is legitimate interests. If an objection is raised, SCA must stop processing the personal data unless it can demonstrate compelling legitimate grounds for the processing that override the data subject's interests, rights and freedoms, or unless the personal data is processed for the establishment, exercise or defence of legal claims.
- **Right to object to direct marketing**
  Where personal data is processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning them. If a data subject objects to processing for direct marketing purposes, processing for those purposes must cease.
- **Continued processing in certain cases**
  The data subject's rights are not absolute in all circumstances, which means that situations may arise in which SCA remains entitled to process the data subject's personal data. In all cases, however, SCA must ensure that it can handle the data subject's request.

7. 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.

8. 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 lawful ground 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.

9. Transfer to third countries

SCA only processes personal data within the EU/EEA, as a general rule. 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. If 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 EU Standard Contractual Clauses with the recipient. We can also take further action when needed.

10. 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.

11. 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' role at SCA and the personal data processing in question.

12. GDPR management organization

SCA has a specially composed management organization for issues related to GDPR. The GDPR management Team has the overall responsibility for the GDPR governance. In addition to this, specific work is conducted mostly in the business areas, such as updating internal special procedures and documentation.

13. 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 Team, with the help of internal or 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.

14. Processing of personal data

SCA collects personal data that you provide to us voluntarily when you interact with us, for example when you email us or enter into an agreement with SCA. We also collect personal data during our ongoing business relationship with you.

Personal data may also be generated throughout our business relationship with you because of your activities, such as attending SCA events, or when we fulfil our legal obligations as a company.

SCA also collects data when you use our online forms and through cookies on our websites that collect information on and from your browser. More information is available in the cookie notice on the relevant website.

We may also supplement this data with information from publicly available sources, such as public registers, primarily the Swedish State Personal Address Register (SPAR) and the Real Property Register maintained by Lantmäteriet (the Swedish mapping, cadastral and land registration authority), as well as company and organisation websites. In some cases, SCA purchases data from companies that compile registers.

Separate documents containing more detailed privacy information, which may be relevant to you depending on your role and the context in which you interact with SCA, are available at sca.com/gdpr and internally on SCA's intranet.

15. Contact SCA

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

- by the contact form at sca.com/gdpr or 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.