

Privacy Notice - Stora Enso's Supplier and Stakeholder Register

18.11.2020

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Purpose

The purpose of this Privacy Notice is to provide you as a data subject communicating with Stora Enso or that are otherwise registered in Stora Enso's personal data register in the role of a supplier, potential supplier or other external stakeholder (or representative of the foregoing) with information about Stora Enso's processing of your personal data as a data controller. This Notices gives a general understanding of personal data processing, however, the individual situations in which personal data is being processed may vary. Thus, all the information provided in this Privacy Notice may not be applicable to each different data processing situation and further information may be provided directly to you in connection with the collection of your personal data. If a you wish to have more detailed information in relation to how your personal data is being processed, you should contact your own contact person in Stora Enso or use the contact information provided in section 2 of this Privacy Notice.

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Data Controller

Stora Enso Oyj and its subsidiaries are joint data controllers in respect of the personal data which they jointly process and share. Stora Enso Oyj and its subsidiaries share the data controller's obligations and responsibilities between each other as they deem appropriate based on the relevant circumstances. In general, Stora Enso Oyj is responsible for (i) the functionality and security of the IT systems, (ii) data privacy and IT policies, guidelines and instructions for the group, and (iii) that global personal data systems and registers are compliant with applicable privacy laws, while the subsidiaries for their part are responsible for (i) the validity, accuracy and completeness of the personal data within the systems, and (ii) ensuring that local personal data registers, systems and processes are in compliance with applicable local and EU laws. More information on Stora Enso's subsidiaries and jointly controlling entities can be found [here](#).

Regardless of the applicable data controller in each situation, you can always use your rights by contacting Stora Enso Oyj:

Address:

Stora Enso Oyj
Kanavaranta 1
P.O. Box 309
FI-00101 Helsinki
Finland

Email:

data.privacy@storaenso.com

Telephone:

+358 20 46 131

3**Legal basis
and Purposes
of Personal
Data
Processing**

In many cases the suppliers and other stakeholders of the Stora Enso group are legal entities and not natural persons. However, in order to establish and maintain a supplier relationship, processing of personal data of you, representing and working for the supplier companies and other legal entities, is inevitable. Stora Enso may also collect personal data of you as a representative of a potential supplier. In some situations, the relationship is directly between Stora Enso and you.

The legal grounds for processing personal data are either fulfilment of an agreement concluded between a Stora Enso group company and you, legal obligation, the legitimate interest of Stora Enso or your consent.

Providing certain personal data to Stora Enso is necessary in order for Stora Enso to be able to conclude an agreement with you. If you refuse to give this personal data, Stora Enso may not be able to establish or continue the business relationship.

In certain cases, Stora Enso has a legal requirement to collect certain information of its suppliers and other stakeholders and their representatives. These situations relate e.g. to anti-money laundering and counter terrorism regulation, market abuse regulation, compliance breach reporting, reviewing of sanctions and other similar official lists and auditing.

Processing of personal data based on a legitimate interests applies when it concerns establishing, managing and developing Stora Enso's relationship (including concluding and managing contracts and agreements with organisations that you are representing), with activities related to marketing, purchasing and communications with Stora Enso's business partners and stakeholders. Stora Enso may use personal data to enable fulfilment of contracts, delivery management, invoicing and other transactions. The supplier and stakeholder data can also be used for communications purposes and conducting surveys.

The personal data aggregated through supplier and stakeholder communications and other interactions may be used for evaluating needs for business enhancement as well as for improvement of Stora Enso's products, services and tools.

Additionally, Stora Enso processes personal data to ensure visitors' safety and its facilities' and premises' security against misuses, thefts or unauthorized accesses. Stora Enso may also need to process personal data in order to ensure the security and functionality and to track the usage of the Stora Enso IT systems and on-line services.

In limited cases (usually when required by local laws), Stora Enso may need to request consent for certain specific data collection or processing. Such consent can be at any time cancelled by you by using technological means or contacting Stora Enso in accordance with section 11.

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Content of the Register

The personal data Stora Enso may collect and process within the supplier registers includes the following personal data categories:

- 1) Contact information, including name, job title/other role, e-mail address, phone number, preferred contact language and possible other necessary information to enable efficient and timely contacts and communication
- 2) Other necessary identification data such as ID number and date of birth
- 3) User, identification and user activity information related to online tools and services
- 4) Information related to procurement and other co-operation projects, opportunities, meetings, supplier visits and other ongoing or planned projects
- 5) Historical information of prior contacts and co-operation, e.g. meeting history, event participation history, communications history, project and co-operation history as well as history of information of unrealised projects
- 6) Marketing and communications information, e.g., campaign and other communications material delivery, activity and visit history and communication contents
- 7) Feedback and interview records as well as compliance breach notices received from the suppliers and other stakeholders
- 8) Event related information, such as rsvp data, diet related information and attendance confirmation
- 9) Sanctions screening data (as required and allowed by national laws)
- 10) Insider lists, including time of acknowledgement (of when the person first time received respective insider information)

- 11) Location data collected from supplier's mobile devices or otherwise, however after taking care of necessary directions, receiving a request or person's consent for this, as required by the applicable laws.
- 12) Information if you do not want to receive marketing messages or other communications
- 13) Data related to the device used by you and browsing data, however only to the extent you have consented to the use of cookies or the collection of said data

The register may also contain some other similar and relevant contact and business information for the purposes of managing deliveries and co-operation relationship as described in section 3.

Stora Enso does not collect data relating to sex life or sexual orientation, race, disability, ethnic or social origin, genetic or other biometric features, religion or belief, political or economic or societal opinion (notwithstanding situations where such information is related to the persons societal or economic public role and the information can be regarded as public by the respective individual himself/herself) or membership of a national minority, unless this is required by law or necessary in order to fulfil a legal obligation that Stora Enso is subject to.

Furthermore, Stora Enso does not collect data relating to your health except in units where health care services are provided to you through company owned health care functions. In some rare cases health information may be inferred from the diet information you have given in connection with an event registration.

Stora Enso takes into account applicable local legislation when collecting personal data and ensures that personal data is always limited to information necessary for the said purposes as described in section 3.

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Regular Sources of Information

Personal data is primarily collected directly from you or aggregated through the communications and other co-operation Stora Enso has with the you. Another typical source of information are the companies and other legal entities you represent as well as the web pages of these entities. Stora Enso may collect personal data also from other reliable public sources or third parties, such as the trade registers and industry databases.

6**Data Retention**

Stora Enso manages the personal data within the supplier and stakeholder register and regularly deletes and corrects unnecessary and outdated data when the supplier relationship or other communications between you and Stora Enso are active. After the relationship between you and Stora Enso becomes passive, Stora Enso retains the personal data for pre-defined time periods. These time periods have been defined based on Stora Enso's genuine needs and the legislative requirements Stora Enso is subject to. As a ground rule, personal data that is not subject to any statutory retention requirements shall be deleted from the Supplier and Stakeholder Register after ten years of passive retention, when the supply or other relationship between Stora Enso and you has ended. For more information regarding the retention times, please contact Stora Enso in accordance with section 11.

7**Regular Data Disclosures**

Personal data from the supplier and stakeholder registers is disclosed to Stora Enso's auditors, insurance companies and different governmental authorities/agencies (or similar) for the purposes of their regulatory tasks. When necessary, personal data may be disclosed to selected third parties e.g. to facilitate delivery management. All parties are allowed to process the data only to the extent necessary to manage tasks or provide the service that has been agreed with Stora Enso.

Personal data may be also disclosed to other companies within the Stora Enso company group for purposes compatible with the processing purposes defined in Section 3 of this Privacy Notice.

Certain data processing activities may be outsourced to carefully selected third party service providers (such as IT service providers, marketing service companies, consultants) in which case such third-party processors operate on behalf of Stora Enso under a specific data processing agreement.

8**Data Transfers from EU/EEA**

Some of the entities who receive personal data from Stora Enso or to whom Stora Enso has outsourced personal data processing functions are located outside of European Union and/or European Economic Area. In such situations, Stora Enso ensures that sufficient level of data protection is maintained with appropriate safeguards, e.g. by signing the EU Commission's model clauses with the party receiving the data. The Stora Enso group's internal data transfers are governed with a contractual framework based on the EU Commission's model clauses.

For more information regarding transfer of personal data to such third countries, please contact Stora Enso in accordance with section 11.

9**Data Security**

Personal data in Stora Enso's IT systems are protected against unauthorized access with various information security measures. Each user has a personal user ID and password for entering the systems and access to personal data is granted only to persons who need the access in order to fulfil the tasks and duties relating to their role with and within Stora Enso.

Additionally, Stora Enso and its service providers are actively monitoring the confidentiality, integrity and availability of the IT environment and have implemented technical measures to prevent and detect incidents that may threaten any personal data.

The security of personal data is also ensured when transferring or disclosing the data to other processors. The measures employed vary based on the sensitivity of the data and includes e.g. identification of authorized recipients and encryption.

10**Your Rights**Access to information

You are entitled to obtain information on the personal data concerning you which Stora Enso is processing and obtain a copy of such personal data. You are kindly asked to use the template provided on this [Privacy](#) site for such requests. The filled-out form or a request including similar information may then be presented to Stora Enso in accordance with section 11 of this Privacy Notice.

Right to rectification, erasure and restriction

You are entitled to have any personal data that is inaccurate, outdated, unnecessary or contrary to the purposes of data processing corrected or erased. You are kindly asked to use the template provided on this [Privacy](#) site for such requests. Requests concerning rectification and erasure may be presented in accordance with the instructions in section 11 of this Privacy Notice.

You are also entitled to have Stora Enso restrict the processing of your personal data for example when you are waiting for Stora Enso's answer to your access or erasure request.

Right to object to processing

On grounds relating to your particular situation, you are entitled to object to the processing of personal data concerning you, provided that the processing is based on Stora Enso's legitimate interest.

Data subjects are kindly asked to use the template provided on this [Privacy](#) site for such requests and present them in accordance with the instructions in section 11 of this Privacy Notice. In this request, you shall define the particular situation based on which you are objecting to the data processing. Stora Enso may decline the request on statutory grounds.

Data Portability

You are entitled to receive an electronic copy of the personal data that has been provided by you for the purposes of performing the contract made between you and Stora Enso or where the processing is based on consent. Furthermore, the data may be transmitted directly to another data controller on your request, if this is technically feasible.

Right to withdraw consent

In case of a legal obligation to request your consent for data processing, you have the right to withdraw your consent.

Right to lodge a complaint

You are entitled to lodge a complaint with a competent data protection authority regarding the Stora Enso's processing of personal data.

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Contacting the Data Controller

In all questions and matters relating to personal data processing or your rights, you should contact Stora Enso. You may use your rights by sending an e-mail to data.privacy@storaenso.com.

Stora Enso is entitled to decline requests on statutory grounds. Stora Enso shall inform you of such a decline including the grounds for the decline.