

# Procedures for Nordic Paper's processing of personal data for employees, contractors, suppliers and customers

## 1. Background and purpose

For Nordic Paper, personal privacy is important. We therefore always strive for a high level of data protection. In this guideline, we explain how we collect and use personal data. We also describe your rights and how you can enforce them.

You are always welcome to contact us if you have questions about how we process your personal data. Contact details are last in this text.

## 2. What is personal data and what is a processing of personal data?

Anything that can be directly or indirectly derived from a natural person who is alive is covered by the concept of personal data. It's not just about names and Social Security numbers, but also about pictures and email addresses, for example. The processing of personal data is everything that happens with the personal data regardless of whether it is carried out automated or not. These include collection, registration, structuring, storage, processing and transfer.

## 3. Personal data processor

This guideline applies to the personal data processing that takes place within the Nordic Paper Group regardless of the country. This means that this guideline applies to all group companies and that personal data may be transferred between companies within the Group.

## 4. What personal data do we collect about you and why?

### 4.1 Personal Data

**Employees:** The personal data collected and processed by Nordic Paper are as follows: name, e-mail address, telephone number, position, salary, education, salary payment information, social security number, gender, marital status, data on vacation, leave, benefits, insurance, work experience, skills, grades, employment contracts, form of employment, data on sick leave,

sick pay, rehabilitation measures, sick certificates and, if necessary, information about union membership.

**Contractors:** The personal data that Nordic Paper collects and processes for contact persons at contractors is as follows: name, contact details, workplace (i.e. entrepreneur's name) and driving permit (which includes social security number).

**Suppliers:** The personal data that Nordic Paper collects and processes for contact persons at suppliers is as follows: name, contact details and workplace (i.e. the supplier's name and corporate identity number).

**Customers:** The personal data that Nordic Paper collects and processes for contact persons at customers is as follows: name, contact details and workplace (i.e. customer name and corporate registration number).

## 4.2 Purpose and legal basis

**Employees:** The vast majority of personal data that Nordic Paper processes about you is processed to administer your employment relationship so that we can fulfill your employment contract. In addition to processing your personal data in order to fulfil your employment contract with us, we may also use the data for other purposes and on the basis of other legal grounds:

- **Performance of employment contracts.** For administration of your employment relationship, e.g. so that we can lead and distribute the work, maintain competence and follow up our operations.
- **Legal obligation.** Tax data, salary specifications and other accounting information are processed in accordance with applicable legislation.
- **Obligations in the field of labour law.** Data on sick leave, sick pay, occupational injuries, membership of a trade union, priority in the case of re-employment, etc.m., which are processed only to the extent necessary for us to fulfil our obligations or exercise our rights in labour law.
- **Legitimate interest (balancing of interests).** For statistical purposes, security maintenance and marketing of us, as well as to inform you about our business, which outweighs your interest in, for example, not being informed about our business.

**Contractors:** The personal data that Nordic Paper processes about contact persons of contractors is processed on the basis of the legal basis for the performance of **contracts** (for the personal data that regulates

your access to our area, e.g. through the use of access cards) and balancing of interests (for other personal data) where our interest in contacting you, for example, outweighs your interest in us not being able to contact you, for example.

**Suppliers:** The personal data that Nordic Paper processes about contact persons at suppliers is processed in order to be able to administer the contractual relationship on the basis of the legal basis of balancing interests where our interest in **contacting** you, for example, outweighs your interest that we should not be able to contact you, for example.

**Customers:** The personal data that Nordic Paper processes about contact persons at customers is processed in order to be able to administer the contractual relationship on the basis of the legal basis of balancing interests where our interest in **contacting** you, for example, outweighs your interest that we should not be able to contact you, for example.

If Nordic Paper were to process your personal data for any purpose that requires your consent, we will obtain your consent in advance.

## 4.3 From what sources do we collect personal data?

**Employees:** We collect and process personal data that you provide to us in connection with the commencement of and during your employment, e.g. when you enter into an employment contract with us. Personal data may also be collected from other sources, e.g. from previous employers, authorities or publicly available registers.

**Contractors:** We collect and process personal data that you provide to us in connection with you performing work in our area and during the assignment period.

**Suppliers:** We collect and process personal data that you provide to us in connection with the conclusion of our agreement and during our contractual relationship.

**Customers:** We collect and process personal data that you provide to us in connection with the conclusion of our agreement and during our contractual relationship.

## 5. Who may we share your personal data with?

### 5.1 Personal data processor

In some situations, it is necessary for us to engage other parties that provide services to us. This involves, for example, using different IT providers. They are to be regarded as personal data processors to us because they process personal data on our behalf. Nordic Paper is responsible for entering into agreements with all personal data processors and providing instructions on how they may process the personal data. Of course, we check all personal data processors to ensure that they can provide sufficient guarantees regarding the security and confidentiality of the personal data they process.

When personal data processors are engaged, it is only for those purposes that are compatible with the purposes we ourselves have for the processing.

### 5.2 Operators who are independently responsible for personal data

We also share your personal data with certain other actors who are independently responsible for personal data. These may be authorities, such as the Swedish Tax Agency, the Enforcement Authority, the Swedish Social Insurance Agency, etc., to which we need to disclose the data in order, for example, to be able to fulfil certain legal obligations (e.g. if an authority requires it for statistical purposes). Nordic Paper may also disclose personal data to other actors who are independently responsible for personal data, such as the police or other authorities, if it concerns the investigation of crimes or if we are otherwise obliged to disclose such information on the basis of law or government decisions.

When your personal data is shared with an actor who is an independent data controller, that organisation's privacy procedure apply.

## 6. Where do we process your personal data?

We always strive for your personal data to be processed within the EU/EEA, but sometimes this is not possible.

For some IT support, the data can be transferred to a country outside the EU/EEA. This applies, for example, if we share your personal data with a data processor who, either himself or through a subcontractor, is established or stores information in a country outside the EU/EEA. As data

controllers, we are responsible for taking all reasonable legal, technical and organisational measures to ensure that these processing takes place in accordance with EU/EEA regulations.

When personal data is processed outside the EU/EEA, the level of protection is guaranteed either by a decision of the European Commission that the country in question ensures an adequate level of protection or through the use of so-called appropriate safeguards. These include the "Privacy Shield" (Privacy Shield) use of "Binding Corporate Rules" and various contractual solutions. If you would like further information about these safeguards, please feel free to contact us. Standardised model data transfer clauses adopted by the European Commission are also available on the European Commission's website.

## 7. How long do we save your personal data?

We never save your personal data for longer than is necessary for each purpose. We have developed thinning procedures to ensure that personal data is not stored for longer than is necessary for the specific purpose. The duration of this varies depending on the purpose of the processing and in some cases depends on laws and regulations. Some of the data in the accounts need to be stored for seven years after the end of the financial year, for example, after the end of the financial year, while data on special diets or participants are deleted after the event is completed.

## 8. What are your rights as a data subject?

As a data subject, you have a number of rights under applicable law. How to manage your rights, see the section "Managing your rights" further down. Below we list the rights of the data subject.

### 8.1 Right to register extract (right of access)

If you want to know what personal data we process about you, you can request access to the data. When you make such a request, we may ask some questions to ensure that your request is handled effectively. We will also take steps to ensure that the data is requested by and provided to the right person.

### 8.2 Right to rectification

If you find that something is wrong, you have the right to request that your personal data be corrected. You can also supplement any incomplete personal data. In some cases, you can make corrections yourself, which we will then inform you about.

### 8.3 Right to erasure

You can request that we delete the personal data we process about you, among other things:

- The data are no longer necessary for the purposes for which they are processed.
- You object to a balance of interests we have made based on our legitimate interest, where your reason for objection outweighs our legitimate interest.
- The personal data is processed illegally.
- The personal data has been collected about a child (under the age of 13) for whom you have parental responsibility.
- If the information has been obtained with the support of your consent and you wish to withdraw your consent.

However, we may have the right to refuse your request if there are legal obligations that prevent us from immediately deleting certain personal data. It may also be the case that the processing is necessary for us to establish, enforce or defend legal claims.

## 8.4 Right to restriction

You have the right to request that our processing of your personal data be restricted. If you believe that the personal data we process about you is not correct, you may request limited processing for the time we need to verify the accuracy of the personal data.

If, and when, we do not need your personal data for the stated purposes, our routine is normally that the data is deleted. If you need it to establish, enforce or defend legal claims, you may request limited processing of the data with us. This means that you can request that we do not clear and delete your data.

If you have objected to a balancing of interests that we have invoked as a legal basis, you may request limited processing for the time we need to verify whether our legitimate interests outweigh your interests in having the data deleted.

If the processing has been restricted in any of the above situations, we may only, in addition to the storage itself, process the data to establish, enforce or defend legal claims, to protect someone else's rights or if you have given your consent.

## 8.5 Right to object to certain types of processing

You always have the right to object to any processing of personal data based on a balance of interests

## 8.6 Right to data portability

As a data subject, you have the right to data portability if our right to process your personal data is based either on your consent or the performance of a contract with you. A prerequisite for data portability is that the transfer is technically possible and can be automated.

## 8.7 Manage your rights

The application for a register extract or if you wish to invoke any of your other rights must be written and self-signed by that extract. We will respond to your requests without undue delay and no later than within 30 days.

# 9. How do we handle social security numbers?

As far as possible, we avoid processing social security numbers. In some cases, however, this is justified mainly because we need to have a secure identification.

# 10. How is your personal data protected?

We work actively to ensure that personal data is handled safely. This applies both through technical and organisational safeguards.

# 11. Supervisory authority

The Swedish Data Protection Authority is the responsible supervisory authority for monitoring the application of data protection legislation. If you believe that our processing of your personal data is not in accordance with applicable law, you can contact the Privacy Protection Authority (IMY).

## 12. Contact

If you have questions about how we process personal data or have a request in accordance with the above rights, you are always welcome to contact our HR Director: Lars Löfquist, e-mail [lars.lofquist@nordic-paper.com](mailto:lars.lofquist@nordic-paper.com).

## 13. Changes to the Guideline

Should any changes be made to these procedure, the new version will be published on nordic paper's intranet and website.