

Metsä Group

24.3.2023

Privacy statement

Visy Access Gate access control register of the outer perimeter of Metsä Group's factory areas

In this privacy statement, we describe how Metsäliitto Osuuskunta and its subsidiaries process your personal data in connection with access control. We can update the privacy statement, and an up-to-date version of the privacy statement can be found in the access control service.

1. Data Controller

Metsäliitto Cooperative and its subsidiaries (hereinafter "Metsä Group"), registered address of the head office Revontulenpuisto 2, 02100 Espoo, Finland

2. Contact information

Please contact us by email
privacy@metsagroup.com

3. The purposes and legal grounds for processing personal data

The register contains personal data of personal and vehicles working and moving within the limited factory area.

Metsä Group uses collected personal data to implement access control at Metsä Group's factories and factory areas. The purpose of the data processing is to ensure and control the regional, business premises, crime, personal and information security of factory sites and units, as well as maintaining a real-time personnel list.

The information is used to comply with legal obligations. Metsä Group can also use personal data to warn or alert people working in the factory or factory area in accident or dangerous situations. In addition, the information can be used for informing in matters related to occupational health and safety.

Our legal basis for collecting and processing personal data is 1) complying of statutory obligations or 2) performing contractual rights and obligations.

4. Processed personal data

Personal information such as:

- Name
- Tax number
- Date of birth
- Citizenship
- Street address, postal code, post office, country
- Telephone number
- Email address
- Organization
- Vehicle registration number
- Photo of the person and/or vehicle
- Quality of employment, applicable TES
- The person's qualifications, such as an occupational safety card

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- The foreigner's contact person in Finland
- If necessary, others can also be collected for access control related information

5. Regular sources of information

Metsä Group's factory area's outer perimeter access control terminals with gates.

The registered person hands over his personal data when he registers himself to the service and while using the service. The handover can also take place at Zeroni-service or by the person separately notifying the parties that enter information to the service on behalf of the person. In addition, Metsä Group collects personal data in connection with the use of the service.

6. Regular destinations of disclosed data and whether the data is transferred to countries outside the EU or EEA

Metsä Group may use external service providers. These service providers (and their potential subcontractors) act as processors of Metsä Group's personal data. They process personal data on behalf of Metsä Group only for the provisions of services to Metsä Group. The service providers have no independent right to use the personal data for any independent purposes.

In addition, personal data may be disclosed to the extent necessary to meet any applicable law, regulation, legal process or an enforceable governmental request.

The personal data is mainly processed within EU/EEA but it can also be processed outside the EU/EEA. Metsä Group will only transfers your personal data outside the EU/EEA in accordance with one of the legal grounds described below:

- The recipient country is regarded by the European Commission to provide adequate protection for your personal data;
- we have put in place appropriate safeguards for the transfer by using the standard contractual clauses for the transfer of personal data to third countries issued by the European Commission; or
- you have given your consent to the transfer, or there is another legal basis for the transfer based on the applicable data protection legislation.

7. Data security

Personal data is handled with care and confidence. Personal data is processed only by personnel whose job requires processing of the personal data.

All personal data is protected by regularly reviewed and appropriate technical and organizational data security measures that prevent access to information, data modification, destruction or other processing, including unauthorized sharing or transfer of information by accident or illegally. These measures include, for example, adequate firewall arrangements, encryption

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of telecommunications and messages where applicable, secured server rooms, and up-to-date access rights and access management practices for information systems.

8. Rights of the registrant

You have a right:

- access, update, remove and correct your personal data;
- object to the use of your personal data on grounds relating to your particular situation when our legal ground for processing your personal data is our legitimate interest
- demand Metsä Group to restrict the processing of your personal data.

You can exercise any of your rights above by contacting Metsä Group via our privacy website <https://www.metsagroup.com/fi/tietosuoja/>. Alternatively, you may visit us in person, by post or by sending an email to the address below. Metsä Group may ask you to specify your request in writing and to prove your identity before processing your request.

Requests shall be submitted in writing to:

Metsäliitto Cooperative
Legal matters
Revontulenpuisto 2
02020 METSÄ

Requests can be submitted in person at :

Revontulenpuisto 2
02100 Espoo

Please note that we may not be able to implement all your rights if we have a legal ground for it.

If you are dissatisfied with how we process your personal data, you have the right to file a complaint with the competent supervisory authority responsible for monitoring compliance with applicable data protection legislation. In Finland, the supervisory authority is the Data Protection Commissioner (tietosuoja(at)om.fi).

9. Data retention policy

Personal data is actively maintained throughout the life-cycle of the processing activity in question. Personal data is retained only as long as necessary and justifiable or as required by applicable legislation or for the exercise of claims or litigations or internal investigations.

At the end of active use, the data is marked as inactive. Data marked as inactive will be deleted after the end of their use.

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as long as necessary and justified or as required by applicable legislation, or if the retention of personal data is necessary due to claims for damages, legal proceedings or internal company investigations.