

## PRIVACY POLICY FOR SITE SECURITY SYSTEMS

This Privacy Policy governs the manner in which UPM-Kymmene Corporation and its Group companies located in Finland (“UPM”) collect and process personal information of UPM’s employees and external visitors accessing its production facilities and/or sites located in Finland. By accessing UPM’s production facilities and/or site, you agree to be bound by these terms and conditions. This Privacy Policy may be updated from time to time (any changes will be posted here).

This Privacy Policy only covers data processing carried out by UPM and not by any third parties operating any site or service incorporating or linking to our services.

UPM is committed to protecting and respecting your privacy. When processing any personal information provided by you, UPM shall always comply with and abide by the applicable personal data and data protection legislation. UPM has endeavored to take appropriate action to protect personal information provided by you in order to prevent their unauthorized access and incorrect use.

Site Security Systems covers: Access management system, CCTV camera system, SMS and email messages

### Information we collect

We collect personal information about you when you visit our production facilities and/or sites located in Finland. By accessing our production facilities and/or sites, you consent to the use of your personal data in line with this Privacy Policy. UPM may receive information about you from UPM contractor portal, External access portal, ACR and third parties with whom we have a business relationship. CCTV area surveillance video data.

The information we collect and process about you may include your full name, phone number, email, date of birth, tax identification number, starting and ending date of your presence at UPM’s site, your employer and employer’s business ID (or equivalent foreign company registration number), vehicles’ registration numbers and any other necessary information relating to access management that you may give us. Information we collect about you is used to manage security and access rights of UPM’s personnel, external service providers and tenants and any other third parties visiting UPM’s production facilities and/or sites located in Finland and for their monitoring within UPM’s production facility and/or site.

Information we collect about you is to be used only for the above described purposes and:

- to identify visitors of our production facilities and/or sites (persons and owners of vehicles);
- to manage site access rights of persons working at production facilities and/or sites;
- to monitor persons and vehicles and keep real-time list of persons and vehicles (internal and external) in the production facilities and/or sites;
- to contact you if needed when entering or be present at our premises
- personnel site presence information can be used for checking purposes of contractor's invoice and other legal obligation e.g. tax reporting
- internal investigation purposes e.g. fire event, ohs accident, security deviation
- Remote alarm center records phone information and data is used only for investigation purposes

### **Sharing data with external parties**

We may use third party service providers to enable us to provide the access management system or administer related activities on our behalf. We may share your information with these third parties only for the limited purposes outlined above. UPM will not disclose your personal information in any other circumstances, unless we have your consent or if disclosure is required by law. Your data will not be transferred by us outside the EEA.

We must share detailed information to officials e.g. police when they have legal rights and give us a formal request

### **Data security**

UPM has taken industry standard technical and organizational measures to restrict access to your personal information and protect it against loss, accidental destruction, misuse and unlawful alteration. Only selected employees and third-party suppliers have access to personal data files.

### **Your rights**

You have right to have the personal information we have stored about you by sending us a written request to the address indicated below / by contacting us on the address indicated below, and where necessary, to have it amended or deleted if it is incorrect, inaccurate, unprecise or outdated.

To exercise your rights or to obtain more information, please contact:

UPM-Kymmene Corporation /  
Corporate Security  
Alvar Aallon katu 1, P.O. Box 380  
FI-00101 Helsinki, Finland  
Tel. +358 204 15 111 (switch board)  
[privacy@upm.com](mailto:privacy@upm.com)

