

Policy Privacy Policy					
Issued by Head of Impact & Culture	Approved by Board of directors	Approved date 26-03-10	Version 1.0	Page 1 (6)	

Privacy Policy

Information on how we process your personal data

In this Privacy Policy we provide information about our processing of personal data in connection with the consultation process (scoping consultation – “samråd”), the preparation of a permit application, and the review (“prövning”) of our operations or measures under the Swedish Environmental Code (1998:808). If you are included among the stakeholders and affected property owners and/or intend to submit comments during the consultation process or the permitting process, we may process your personal data.

1. Introduction

This Privacy Policy (“Privacy Policy”) describes how PaperShell AB (publ), company registration number 559305-8562, with address Tuagatan 5, 543 50 Tibro, Sweden (“PaperShell”, “we”, “our”, and “us”) processes personal data relating to you.

We are responsible for the personal data processing described in this Privacy Policy in our capacity as data controller.

If you would like more information about how we process your personal data, please contact us via our data protection contact at support@papershell.se.

It is important to us that you feel confident about how we process your personal data. We therefore ask you to read this Privacy Policy carefully. The policy may be updated from time to time, and the date of the most recent update is stated at the top of this document.

2. How we collect your personal data

We process personal data that you provide to us directly or that we obtain through the Swedish property register or other public registers. We may also engage service providers or consultants who collect such personal data on our behalf (for example address information within a defined consultation stakeholder group). To protect your personal data, we always enter into agreements with such third parties.

3. How we process your personal data

3.1 Introduction

We only process your personal data where such processing is permitted under applicable data protection legislation. This means that we must have a legal basis for the processing. In our case, the processing is based on:

Compliance with legal obligations and the exercise of legal rights – the processing is necessary for us to comply with legal obligations or to fulfil obligations imposed by a court or authority decision requiring us to process personal data.

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Below we describe the categories of personal data we process, the purposes for which we process them, the legal basis for such processing and how long the data is stored.

Purpose of the processing	Processing activities	Categories of personal data
<p>Under applicable law, we are required to inform and consult individuals who may be particularly affected by the operations or measures covered by our permit application. For this reason, we collect certain contact details in order to identify and contact individuals who may be affected and inform them about the consultation process.</p> <p>We collect and process your personal data in order to fulfil our legal obligation to inform and consult with individuals who are particularly affected under the Swedish Environmental Code.</p>	<ul style="list-style-type: none"> ○ Collection of contact information and property information ○ Registration and compilation of contact information and property information for distribution of consultation information ○ Administration of consultation notifications ○ Additional communication with you, if necessary ○ Documentation of our contact with you ○ Storage of personal data in order to provide additional information during the consultation process if required 	<p>Contact details of individuals assessed to be affected, such as:</p> <ul style="list-style-type: none"> ○ First and last name ○ Address ○ Property designation ○ Type of residence ○ Telephone number and/or email address in order to contact you where necessary
<p>Legal basis: Compliance with our legal obligation to conduct and document consultation with affected individuals and other stakeholders, and to prepare and document an Environmental Impact Assessment (EIA) as well as apply for permits under the Swedish Environmental Code (1998:808), Chapter 6, Sections 28-31 and 35, Chapter 9, Section 6, as well as Chapter 22 Sections 1-1a.</p>		
<p>Retention period: Personal data will be stored during the permit process and thereafter for thirty (30) days.</p>		
<p>Sharing of personal data: We will share your personal data with the competent court or permitting authority responsible for the permit assessment. We may also, after having shared your personal data with the competent court or permitting authority, share your personal data with other authorities.</p>		

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We may also share personal data with other public authorities, our legal advisors, companies within our corporate group, and service providers with whom we have entered into agreements and who assist us in fulfilling our legal obligations.

Purpose of the processing	Processing activities	Categories of personal data
<p>We collect and process personal data in order to fulfil our legal obligation to obtain comments during the consultation process under the Swedish Environmental Code.</p> <p>If you submit comments during the consultation process, we will process your personal data for this purpose. Information received during the consultation process may be included in the permit application.</p>	<p>Registration, compilation and documentation of the information you provide to us in connection with the consultation.</p> <p>Additional communication with you, if necessary, and documentation of our contact with you.</p> <p>Storage of your personal data in order to contact you, if necessary, regarding the information you provided during the consultation process.</p>	<p>Contact information necessary to fulfil the documentation requirements for comments submitted during the consultation process under the Swedish Environmental Code, such as:</p> <ul style="list-style-type: none"> ○ First name and last name ○ Address ○ Property designation ○ Where applicable, telephone number and/or email address. ○ Other personal data that you provide when submitting comments during the consultation process.
<p>Legal basis: Compliance with our legal obligation to conduct and document consultation with individuals and other affected parties, and to prepare and document an Environmental Impact Assessment as well as apply for permits for our operations or measures under the Swedish Environmental Code (1998:808), Chapter 6, Sections 28–31 and 35, Chapter 9, Section 6, and Chapter 22, Sections 1–1a.</p>		
<p>Retention period: Personal data will be stored during the permit process and thereafter for thirty (30) days.</p>		
<p>Sharing of personal data: We will share your personal data with the competent court or permitting authority responsible for the permit assessment. We may also, after having shared your personal data with the competent court or permitting authority, share your personal data with other authorities. We will also share your personal data with our legal advisors, with companies within our corporate group, and with service providers with whom we have entered into agreements and who require access to your personal data in order to assist us in fulfilling our legal obligations.</p>		

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4. General information on legal obligations and legal claims

We may process your personal data where necessary to comply with legal obligations imposed by law, regulation, court decisions or decisions by authorities.

We may also process personal data in order to establish, exercise or defend legal claims, for example in connection with ongoing or anticipated legal disputes (normally for no longer than ten (10) years from the date of registration).

5. Security measures

We take appropriate technical and organisational measures to ensure that personal data is processed securely.

For example:

- systems containing personal data are only accessible to employees and service providers who need access to perform their tasks
- such individuals are informed about the importance of confidentiality and data security
- appropriate security standards and procedures are implemented to prevent unauthorised access, disclosure or misuse
- systems are monitored to identify vulnerabilities

6. With whom we share your personal data

Access to personal data is limited to individuals who require such access for the purposes described above. Personal data may be shared with:

- a) Companies within our corporate group: Where necessary for consultation processes, administration or the establishment, exercise or defence of legal claims.
- b) Authorities: Where disclosure is required by law, regulation or authority decision.
- c) Service providers: We use third-party suppliers, such as consultants involved in the permit process and IT service providers. When using such suppliers we enter into data processing agreements and take measures to ensure that personal data is handled in accordance with this Privacy Policy.

7. Where we process your personal data

Our objective is to process personal data within the EU/EEA. However, because some of our suppliers operate internationally, personal data may be transferred to countries outside the EU/EEA. In such cases we ensure that appropriate safeguards are in place, for example: adequacy decisions adopted by the European Commission, EU Standard Contractual Clauses.

Further information can be found here:

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Adequacy decisions:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_sv

Standard Contractual Clauses:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_sv

8. Your rights

You have certain rights regarding our processing of your personal data.

Please note that these rights apply to the extent provided under applicable data protection legislation, and certain exceptions may apply. We may also request additional information in order to verify your identity before processing a request.

To exercise your rights or obtain further information, please contact us at support@papershell.se.

8.1 Right of access

You have the right to obtain confirmation of whether we process personal data concerning you. If so, you have the right to receive a copy of the personal data and additional information about the processing.

8.2 Right to rectification

You have the right to request correction of inaccurate personal data without undue delay. You may also have the right to have incomplete personal data completed.

8.3 Right to erasure

You may request that we delete your personal data if:

- the personal data is no longer necessary for the purposes for which it was collected
- processing is based on your consent and you withdraw your consent
- you object to processing based on legitimate interest and your interests override ours
- the personal data has been processed unlawfully
- deletion is required to comply with a legal obligation

8.4 Right to restriction of processing

You may request restriction of processing where:

- you contest the accuracy of the personal data
- the processing is unlawful but you oppose deletion
- we no longer need the personal data but you require it for legal claims
- you have objected to processing based on legitimate interest

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8.5 Right to object

You have the right to object to processing based on legitimate interests. In such cases we must demonstrate compelling legitimate grounds in order to continue processing.

8.6 Right to data portability

Where processing is based on consent or contract, you have the right to receive personal data you have provided in a structured, commonly used and machine-readable format and to request transfer to another controller where technically feasible.

This right does not apply to data processed manually.

8.7 Right to withdraw consent

If processing is based on your consent, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out prior to withdrawal.

9. Complaints to the supervisory authority

In Sweden, the supervisory authority responsible for data protection is the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten – IMY).

If you believe that we process your personal data incorrectly, we encourage you to contact us first so that we can review your concerns. However, you always have the right to lodge a complaint with IMY.