

**PERSONAL DATA ACT FILE (SECTIONS 10 AND 24 OF THE PERSONAL DATA ACT 523/1999)**

[Date of drafting 24 January 2017]

<b>1. Data controller</b>	UPM Paper ENA Oy (hereinafter "PENA") Alvar Aallon katu 1, FI-00100 Helsinki, Finland www.upmpaper.com
<b>2. The person in charge / contact person</b>	Tarja Sammalkorpi Alvar Aallon katu 1, FI-00100 Helsinki/P.O. Box 380, FI-00101 Helsinki Email: tarja.sammalkorpi@upm.com Phone: +358 2041 50537
<b>3. Name of the register</b>	"UPM Paper ENA Enviro Newsletter Recipients"
<b>4. The purpose for processing the personal data / the purpose for the use of a register</b>	The register is used for e-mailing the UPM Paper ENA Enviro Newsletter to subscribers of the newsletter and representatives of parties that have an established relation with PENA. The register is not used for marketing to consumers.
<b>5. Content of the register</b>	The register contains all or some of the following for registered persons: Name of the company, name of the recipient, e-mail address.
<b>6. Regular sources of information</b>	The data have been gathered based on a customer relationship between the recipient's company and PENA. In addition, the register contains data submitted by persons that have subscribed to the UPM Paper ENA Enviro newsletter at PENA's website.
<b>7. Regular destinations of disclosed data and whether the data is transferred to countries outside the European Union or the European Economic Area</b>	No data is disclosed outside PENA and the UPM group of companies. No data is transferred to countries outside the EU or the EEA.
<b>8. The principles how the data file/register is secured.</b>	The data are stored electronically and data protection is being used in the application, by which the entered information shall remain unchanged and is available only for the authorized persons.
<b>9. Right of access and realization of the right of access</b>	A person shall have the right of access, after having supplied sufficient search criteria, to the data on him/her in the personal data file, or to a notice that the register contains no such data. The controller shall at the same time provide the data subject with information on the regular sources of data in the file, on the uses for the data in the file and the regular destinations of disclosed data. A person who wishes to have access to the data on himself/herself as referred to above, shall make a request to this effect to the controller by a personally signed or otherwise comparably verified document. Above described requests shall be directed to Tarja Sammalkorpi either by email (tarja.sammalkorpi@upm.com) or by letter: P.O. Box 380, FI-00101 Helsinki, Finland.
<b>10. Rectification and realization of the rectification</b>	The controller shall, on its own initiative or upon request, without undue delay rectify, erase or supplement personal data contained in the register if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing. The controller shall also prevent the dissemination of such data, if this could compromise the protection of the privacy of the person or his/her rights.

If the controller refuses the request by a person whose data is contained in the register concerning the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In this event, the person may bring the matter to the attention of the Finnish Data Protection Ombudsman.

The controller shall notify the rectification to recipients to whom the data have been disclosed and to the source of the erroneous personal data. However, there is no duty of notification if this is impossible or unreasonably difficult.

Above described requests shall be directed to Tarja Sammalkorpi either by email ([tarja.sammalkorpi@upm.com](mailto:tarja.sammalkorpi@upm.com)) or by letter: P.O. Box 380, FI-00101 Helsinki, Finland.