

GENERAL PRIVACY POLICY

This Privacy Policy sets out how Arauco Europe Coöperatief U.A. ("we", "our", "us", "Arauco") handles the Personal Data of its customers, suppliers and other third parties. Arauco is the Controller for this Processing, unless expressly stipulated otherwise.

ARTICLE 1. APPLICABILITY OF THIS PRIVACY POLICY

This Privacy Policy applies to Data Subjects whose Personal Data Arauco collects and/or Processes.

ARTICLE 2. PROCESSING OF PERSONAL DATA

- 2.1 We adhere to the principles relating to Processing of Personal Data set out in Applicable Privacy Legislation which require Personal Data to be:
- a. Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
 - b. Collected only for specified, explicit and legitimate purposes (Purpose Limitation).
 - c. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimization).
 - d. Accurate and where necessary kept up to date (Accuracy).
 - e. Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
 - f. Processed in a manner that ensures its security using appropriate technical and organizational measures to protect against unauthorized or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
 - g. Not transferred to another country without appropriate safeguards being in place (Transfer Limitation).
 - h. Made available to Data Subjects and Data Subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).
- 2.2 We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (*Accountability*).

ARTICLE 3. LEGAL GROUNDS FOR PROCESSING

We only Process Personal Data for specific purposes, which are set out below:

- a. with the prior consent of a Data Subject(s);
- b. the Processing is necessary for the performance of a contract with a Data Subject;
- c. to meet our legal compliance obligations; and/or
- d. to pursue our legitimate interests for purposes where they are not overridden because the Processing prejudices the interests or fundamental rights and freedoms of Data Subjects.

ARTICLE 4. PURPOSES

- 4.1 The performance of a contact with our customers requires the Processing of Personal Data. We Process Personal Data which you provide to us and Personal Data obtained

in the course of the performance of the contract. When you provide Personal Data to us, please do not provide information that is irrelevant, not accurate and/or unnecessary for the services provided.

- 4.2 Arauco Processes the following categories of Personal Data of yours:
- a. name;
 - b. e-mail address;
 - c. telephone number;
 - d. organisation where the Data Subject works and the Data Subject's position.

ARTICLE 5. PROCESSING OF PERSONAL DATA BY THIRD PARTIES

- 5.1 We only share the Personal Data with third parties, such as its service providers, if:
- a. they have a need to know the information for the purposes of providing the contracted services;
 - b. the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
 - c. the transfer complies with any applicable cross border transfer restrictions.
- 5.2 For the performance of the contract with our customers we will provide Personal Data to:
- a. Group entities;
 - b. Subcontractors and service providers involved in the performance of the contract with our customers

ARTICLE 6. DIRECT MARKETING

We will always request prior consent to use your Personal Data for electronic direct marketing, except where we have obtained contact details in the course of a sale to you and it involves the marketing of similar products. In that event the Processing is necessary for purposes of a legitimate interest pursued by us, namely to conduct our normal business. You may always object to direct marketing.

ARTICLE 7. SECURITY

- 7.1 We take appropriate technical and organisational security measures to protect the Personal Data of Data Subjects from being abused, lost or altered.
- 7.2 We retain the Personal Data of Data Subjects on servers in the European Union. If and to the extent that Arauco stores Personal Data with parties in countries that do not have adequate levels of protection, we will take appropriate safeguards, such as standard provisions on data protection determined by the European Commission with these parties.

ARTICLE 8. RETENTION PERIODS

- 8.1 We do not store your Personal Data any longer than strictly necessary for the purposes for which we collect your Personal Data. The Data Subject may request us to delete the Personal Data at any stage. If the Personal Data are no longer required for the purposes for which we collect or otherwise Process the Personal Data, we will remove the Personal Data.

ARTICLE 9. DATA SUBJECT'S RIGHTS

- 9.1 As a Data Subject, you may at any time request that we allow you to access, amend, rectify, add to, delete or restrict your Personal Data if it is factually incorrect or incomplete, or if it is being Processed contrary to a statutory rule.
- 9.2 If a Data Subject no longer wishes to be contacted, Arauco will follow up this request. . We thus ensure that we do not contact Data Subjects against their wishes. If a Data Subject wants his or her name to be removed from the "Do not Contact Me Register", Arauco will implement this request within four weeks and remove the Data Subject's name.
- 9.3 You may always request us to provide you with the Personal Data you yourself have disclosed to us in a structured and conventional form to enable you to transfer it to another Controller. You are only entitled to do so to the extent that the Processing is based on consent within the meaning of Article 6(1)(a) GDPR or if the Processing is necessary for the performance of a contract within the meaning of Article 6(1)(b) GDPR, and if such Processing is automated.
- 9.4 You always have the right to object to the Processing of your Personal Data. We will always grant your request to the extent that the Processing of your Personal Data is for direct marketing purposes. We will no longer Process Personal Data for other purposes unless there are compelling legitimate grounds for the Processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- 9.5 If you wish to exercise any of the rights referred to in this article, you can send your request to Arauco at:

address:	Schipholweg 116, 2316 XD Leiden
email address:	arauco.europe@arauco.cl
telephone number:	+31 71 7890250

We will inform you of the response to your request immediately or in any case within one month after we receive it. Depending on the complexity and number of the requests, this period may be extended by two more months. Arauco will inform you of any such extension within one month after receiving your request.

- 9.6 Where your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we will either charge a reasonable fee or refuse to act on the request.

ARTICLE 10. MISCELLANEOUS

- 10.1 We reserve the right to alter this Privacy Policy regularly. It is your responsibility to read the applicable conditions regularly. This Privacy Policy was most recently amended and revised in June 2018.
- 10.2 If any provision of this Privacy Policy is contrary to the law, it will be replaced with a similar provision reflecting the original meaning of the provision to the extent legally allowed. The other provisions will remain fully applicable in that case.

ARTICLE 11. DEFINITIONS

This Privacy Policy uses the following definitions

Applicable Privacy Legislation:	Applicable privacy legislation, including the General Data Protection Regulation ("GDPR"), the General Data Protection Regulation Implementation Act and any other special Acts.
Arauco:	Arauco Europe Coöperatief U.A. Schipholweg 114 2316 XD LEIDEN.
Controller:	The natural or legal person or any other body including an administrative body that, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.
Data Subject:	An (indirect) customer, supplier or another third party.
Personal Data:	Personal Data is any data concerning an identified or identifiable natural person that is Processed by Arauco, as described in article 3 of this Privacy Policy.
Privacy Policy:	This Privacy Policy.
Process(es)/Processing:	Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.