

SILVESTICA GREEN FOREST ESTONIA OÜ

DESCRIPTION OF PERSONAL DATA PROCESSING OF EMPLOYEES, MEMBERS OF THE GOVERNING BODIES, SHAREHOLDERS (REPRESENTATIVES), BENEFICIARIES, AUTHORISED PERSONS

I. GENERAL PROVISIONS

- 1.1. The purpose of the Description of personal data processing of employees, members of the governing bodies, shareholders (representatives), beneficiaries, authorised persons (hereinafter referred to as the Description) is to set the requirements for processing and protection of Personal data processed in the Company, technical and organisational measures for implementation of Data subjects' rights and data protection in the Company and to ensure adherence to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the GDPR), Personal Data Protection Act and the Personal Data Protection Implementation Act (hereinafter referred to as Data Protection Laws) and other legal acts establishing the requirements for Personal data processing and protection.
- 1.2. Personal data in the Company is collected and processed exclusively following the procedure established by legal acts.
- 1.3. Personal data is processed by non-automatic mode in systemised files and/or automatically.
- 1.4. Everyone who processes Personal data held in the Company or access it because of job position must observe this Description.
- 1.5. This Description is superior to other Descriptions of personal data processing of other Data subjects (clients, suppliers, debtors, etc.) which are active in the Company and defines all general rules if they are absent in other Descriptions.
- 1.6. The Description was prepared in accordance with the GDPR, Data Protection Laws and other legal acts regulating Personal data processing and protection.

II. TERMS AND DEFINITIONS

- 2.1. The following terms used in this Description:
 - 2.1.1. **Data Protection Laws** shall mean the Personal Data Protection Act and the Personal Data Protection Implementation Act No. RT I 2007, 24, 127 of the Republic of Estonia, with all subsequent amendments / supplements.
 - 2.1.2. **Description** shall mean the present Personal data processing description.
 - 2.1.3. **Personal data** shall mean any information about a person, whose identity was established or whose identity can be established (data subject); natural person whose identity can be established is a person whose identity can be established directly or indirectly, first of all by identifier, such as forename and surname, personal identification number, location data and Internet identifier, or by one or several properties of a natural person, physical, physiological, genetic, mental, economic, cultural or social identity.
 - 2.1.4. **Responsible employee** shall mean an Employee of the Company who processes Personal data as a part of his/her job functions (except Data owners).
 - 2.1.5. **GDPR** shall mean the Regulation of the European Parliament and of the Council (EU) of 27 April 2016 **2016/679** on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.
 - 2.1.6. **Company** shall mean SILVESTICA GREEN FOREST ESTONIA OÜ, Company code 10817274, business seat address: Riia tn 24d Tartu, Tartu Tartumaa 51010, Estonia.
 - 2.1.7. **Employee** shall mean an Employee of the Company employed under the employment or contract or freelanced natural person, who is providing services on a continuous basis under the civil agreement on services or other.
 - 2.1.8. **Data recipient** shall mean a natural or legal person, to whom Personal data processed by the Company is disclosed.

- 2.1.9. **Data owner** shall mean a natural person responsible for the assigned field of Personal data processing activity.
- 2.1.10. **Data subject** shall mean a natural person, whose Personal data is processed for the purposes laid down in the Description.
- 2.1.11. **Data processing** shall mean any operation or set of operations which is performed upon Personal data or sets of Personal data, whether or not by automatic 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, blocking, erasure or destruction.
- 2.1.12. **Data processing by automatic means** shall mean data processing actions that are completely or partly carried out by automatic means.
- 2.1.13. **Data processor** shall mean a natural or legal person, who processes Personal data on behalf of the Company.
- 2.1.14. **Data controller** shall mean a natural or legal person, who establishes data processing purposes and means.
- 2.2. Other terms used in the Description shall have the same meanings as defined in the GDPR and Local Data Protection Laws.

III. PURPOSES OF PERSONAL DATA PROCESSING AND DATA CONTROLLER'S DUTIES

- 3.1. Employees' personal data is processed in the Company for the following purposes:
 - 3.1.1. Internal administration: conclusion / execution of employment contract, calculation and payment of salary, submission of income tax returns, management of financial resources (issuing of tangible assets, issuing of bank cards), personnel and career management; storage of documents.
 - 3.1.2. Employees' health care; storage of mandatory documents.
 - 3.1.3. Publicity / marketing of the Company's activities.
- 3.2. Personal data of the members of the governing bodies, shareholders, shareholders' representatives/employees, beneficiaries is processed in the Company for the following purposes:
 - 3.2.1. Administration of the activities of the governing bodies of the Company and implementation of the requirements set in the Law on Prevention of Money Laundering and Terrorism Financing of the Republic of Estonia.
 - 3.2.2. Publicity / marketing of the Company's activities.
- 3.3. Personal data of authorised persons, agents is processed in the Company for the following purposes:
 - 3.3.1. Activity administration of authorised persons, agents.
- 3.4. Joint controllers of the Personal data processed for the purposes laid down in Paragraphs 3.1-3.3 of the Description in the Company are: SILVESTICA GREEN FOREST ESTONIA OÜ, Company code 10817274, business seat address: Riia tn 24d Tartu, Tartu Tartumaa 51010, Estonia, phone No. +46(0)705-132430, electronic mail address: ekonomi@crkforest.se and Silvestica Green Forest AB, Company code 559107-2797, business seat: Vastra storg 22, 291 31 Kristianstad, Kingdom of Sweden, phone No.+46(0)705-132430, electronic mail address:ekonomi@crkforest.se.
- 3.5. Data controller ensures implementation of the following measures during Personal data processing:
 - 3.5.1. Organisational – safe processing of document and computer data and their archives, setting the procedure for work organisation in various activity fields, appointment of Personal data owners, instructing of Personal data processors contracted by the Company, etc.
 - 3.5.2. Hardware and software protection – administration of servers, information systems and databases, Company's premises maintenance, protection of operating systems, protection against computer viruses, etc.
 - 3.5.3. Protection of communications and computer networks – firewalling of shared data programs, undesired data packages, etc.
- 3.6. The head of the data controller appoints Responsible Employees and Data owner.
- 3.7. Access to Personal data can be provided exclusively to the persons who need Personal data for fulfilment of their functions.

IV. PRINCIPLES OF PERSONAL DATA PROCESSING

- 4.1. Every Employee of the Company when processing Personal data must observe the following principles:
 - 4.1.1. Principle of lawfulness, fairness and transparency – Personal data is processed in respect of the Data subject lawfully, fairly and transparently;

- 4.1.2. Limitation of the Personal data purpose – Personal data is collected and processed exclusively for the purposes established in Section III of this Description, clearly defined and lawful purposes and not to be processed incompatibly with the initial purposes.
- 4.1.3. Personal data minimisation – Personal data processed complies with the criteria of adequacy and relevance, i.e. exclusively Personal data that is necessary for the purposes established in this Description is processed.
- 4.1.4. Accuracy – Personal data processed is accurate and updated, when needed. Responsible Employees exert all reasonable measures to ensure immediate erasure or correction of all Personal data that is not accurate considering the purposes of its processing.
- 4.1.5. Storage limitation – Personal data is processed in a form which permits identification of Data subjects for no longer than is necessary for the purposes for which the Personal data is processed.
- 4.1.6. Integrity and confidentiality principle – Personal data is processed in a manner that ensures appropriate security of the Personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- 4.1.7. Accountability – Responsible Employee, Data owner shall be responsible for, and be able to demonstrate compliance with the above-mentioned principles.
- 4.2. Personal data is stored for the periods specified in the Register of data processing activity records of the Company for every purpose of Personal data processing.

V. GENERAL REQUIREMENTS FOR PERSONAL DATA PROCESSING

Purpose of processing	Only for purposes indicated in clauses 3.1-3.3 of this Description
Category of the Data subjects	Employees, members of the governing bodies, shareholders, shareholders' representatives / employees, beneficiaries, authorised persons, agents
Categories of Personal data	Only those specified in the Register of data processing activity records. If the Responsible Employee notices that the Personal data, other than specified in the Register of the data processing activity records, is processed or reasonably believes in the necessity to process such Personal data, he / she must give an immediate notice to the Data owner and follow his / her further instructions.
Categories of Data recipients	Personal data is disclosed exclusively to the Personal Data processors specified in the Register of the data processing activity records (including the Company's Employees who have access) and Data recipients with the legitimate interest to receive Personal data. In case of any uncertainty, the Responsible Employee consults the Data owner regarding the right of the Personal Data processors and Data recipients to receive Personal data.
Data processors	Only those specified in the Register of data processing activity records.
Storage term	As specified in the Register of data processing activity records.
Storage place	As specified in the Register of data processing activity records.
Legal ground for processing	As specified in the Register of data processing activity records.
Automatic decision-making	When processing Personal data, the Company does not apply automatic decision-making
Data transfer	Personal data is not disclosed to a third country or international organisation

VI. SPECIAL REQUIREMENTS FOR PERSONAL DATA PROCESSING

- 6.1. Personal data (documents containing Personal data, or their copies) is stored in the designated premises (lockable cabinets, safe boxes, etc.), local network fields, computer hard discs with encrypted content. Personal data (documents containing Personal data, or their copies) may not be stored in a visible place accessible to anyone, allowing free access to unauthorised persons.
- 6.2. Personal data (documents containing Personal data, or their copies) in external data media must be erased immediately after use and/or movement to the storage locations, but not later than within 5 working days.
- 6.3. Documents containing Personal data, or their copies must be destroyed with no possibility to recover and recognise their contents.
- 6.4. Local network fields, computers containing Personal data must be protected against access with Personal data passwords or access to them must be restricted.
- 6.5. Computers containing Personal data must have screen savers with a password. The Company's Employees must use passwords to access Personal data personally and may not disclose them to

third parties. Passwords must have at least eight symbols, capital and small letters, minimum one digit and symbol. Passwords must be reset at least once in 2 months and immediately, when there is ground to believe the passwords could have become known to third parties.

VII. PERSONAL DATA OWNERS AND RESPONSIBLE EMPLOYEES

- 7.1. Data owners and Responsible Employees are appointed in the Company to implement the requirements established in the GRDP, other legal acts and this Description.
- 7.2. Data owners perform the following functions:
 - 7.2.1. Prepare legal acts regulating Personal data protection and processing, at least once in 2 years review the Description and other internal documents of the Company in the field of Personal data protection, initiate amendments, if needed.
 - 7.2.2. Ensure confidentiality of Personal data according to the requirements of the effective legal acts and implementation of appropriate technical and organisational measures designed to protect Personal data against unlawful access, disclosure, accidental loss, modification or destruction or other unlawful processing.
 - 7.2.3. At least once in 2 years conduct risk assessment of Personal data processing, prepare a report and exert measures to eliminate or minimise risks, if needed.
 - 7.2.4. Control performance by the Data processors of Personal data processing duties established in the agreements.
 - 7.2.5. Consult the Responsible Employees on Personal data processing and protection matters.
 - 7.2.6. Determine the object and duration of Personal data processing, nature and purpose of Personal data processing, types / categories of Personal data and categories of Personal Data subjects for the Data processor.
 - 7.2.7. In case of any breaches in Personal data protection, assess risks, degree of the impact of the breach, damage and consequences and in every individual case submit proposals to the head of the Company on the measures needed for elimination of the breach in Personal data protection and its consequences.
 - 7.2.8. Grant access to Personal data exclusively to the persons who need such data for fulfilment of their functions.
 - 7.2.9. Check collection of Personal data of the Data subjects, coordinate the field of activity of Personal data processing assigned to them.
 - 7.2.10. Ensure management and updating of the records of Personal data processing activity.
 - 7.2.11. Ensure proper handling of inquiries and requests of Personal Data subjects.
 - 7.2.12. Carry out registration of any reply to the questions regarding Personal data protection.
- 7.3. Responsible Employees perform the following functions:
 - 7.3.1. Collect, store and otherwise process Personal data in accordance with the legislation of the European Union and of the Republic of Estonia, the present Description and its annexes, other internal documents of the Company. Process Personal data specified in the Register of the Company's data processing activity records for the purposes specified in it.
 - 7.3.2. Notify the Data owner without any delay about any suspicious situation which can jeopardise security of Personal data.
 - 7.3.3. Ensure security of the personal data processed.
 - 7.3.4. Ensure timely updating of processed Personal data, data storage, safe destruction.
 - 7.3.5. Ensure provision of information about the inquiries from Personal data subjects to the Data owner.
 - 7.3.6. Ensure that Personal data is disclosed exclusively to the Personal Data processors specified in the Register of the Company's data processing activity records (including the Company's Employees who have access) and Data recipients with the legitimate interest to receive Personal data. In case of any uncertainty, consult the Data owner regarding the right of the Personal Data processors and Data recipients to receive Personal data.
 - 7.3.7. Ensure delivery to the Data subjects of information notices of descriptions regulating the terms and conditions of processing of Personal data of specific Data subjects in the Company;
 - 7.3.8. Ensure that Personal data, processed exclusively on the basis of the consent of the Data subject, is not processed without consent.
 - 7.3.9. Inform the Data owner immediately after noticing Personal data, other than specified in the Register of the Company's data processing activity records, is processed or reasonably considering there is a necessity to process such Personal data.
 - 7.3.10. Ensure that Personal data is stored in the storage locations specified in the Register of the Company's data processing activity records.

VIII. PROCEDURE OF MANAGEMENT OF PERSONAL DATA SECURITY BREACHES AND RESPONSE TO SUCH BREACHES

- 8.1. If the Employees with the access to the Personal data notice any breaches in Personal data security (persons' inactivity or actions that may jeopardise or that jeopardise Personal data security), they must inform the Data owner.
- 8.2. Upon assessment of the risks, degree of the impact of the breach, damage and consequences of Personal data security breach, the Data owner makes decisions on the measures needed for elimination of the breach in Personal data protection and its consequences.

IX. PERSONAL DATA PROCESSORS

- 9.1. To appoint a third party as the Personal data processor, the Personal Data controller must:
 - 9.1.1. Sign an agreement with the Personal data processor containing the following information listed in this Paragraph:
 - 9.1.1.1. Object of Personal data processing.
 - 9.1.1.2. Duration of Personal data processing.
 - 9.1.1.3. Nature of Personal data processing.
 - 9.1.1.4. Purpose of Personal data processing.
 - 9.1.1.5. Types / categories of Personal data.
 - 9.1.1.6. Categories of Personal data subjects.
 - 9.1.1.7. Rights and duties of the Parties arising from the legal regulation of Personal data protection.
 - 9.1.1.8. Confidentiality obligations of the employees of the Personal Data processor.
 - 9.1.1.9. Security measures of Personal data receipt processing.
 - 9.1.1.10. Contracting additional Personal data processors.
 - 9.1.1.11. Assistance in exercising Personal Data subjects' rights.
 - 9.1.1.12. Assistance in giving notices about any breaches in Personal data security.
 - 9.1.1.13. Auditing possibility.
 - 9.1.2. Control of fulfilment by the Personal Data processor of the obligations established in the agreement.
- 9.2. Access of the Personal Data processor to Personal data is removed upon cancellation of the Personal data processing agreement signed with the Data controller, or upon expiry of the latter agreement.

X. DATA SUBJECTS' RIGHTS AND THEIR IMPLEMENTATION PROCEDURE

- 10.1. Personal Data subject has the following rights:
 - 10.1.1. To know (be informed) about his/her Personal data processing.
 - 10.1.2. To familiarise with his/her Personal data processed.
 - 10.1.3. To request for correction of his/her Personal data.
 - 10.1.4. To request for erasure of his/her Personal data ('the right to be forgotten').
 - 10.1.5. To request for restriction of his/her Personal data processing.
 - 10.1.6. To data portability.
 - 10.1.7. To disagree with his/her Personal data processing.
- 10.2. The Company will notify the Data subject in writing about the examination of his/her request or obstacles that make satisfaction of the request impossible. The Company sends a reply in the same manner how the Data subject's request was received.
- 10.3. To be able to exercise his/her rights, the Data subject must identify himself/herself. If the Data subject's identity raises any concerns, the Data owner has the right:
 - 10.3.1. To request the Data subject for a document certifying his/her identity in the cases when the Data subject submits his/her request by physically delivering it to the Company.
 - 10.3.2. To request the Data subject for a notarised copy of his/her identity document, when the Data subject sends his/her request by post or a courier.
 - 10.3.3. To request the Data subject to certify his/her identity by affixed a verified electronic signature to his/her request, when the Data subject submits his/her request via electronic means of communication.
 - 10.3.4. To request the Data subject's representative for a notarised authorisation to represent the Data subject, when a representative of the Data subject submits the request on behalf of the Data subject.
 - 10.3.5. To request the Data subject to identify himself/herself by any other means.

- 10.4. The Company implements the Data subjects' rights for free; unless evident signs of abuse of their rights are established (Data subject's requests are evidently unreasonable or disproportionate, of repetitive nature, etc.) In such event, the Company is entitled to compensation equivalent to its factual expenses related to examination of the Data subject's request concerned.
- 10.5. The Data subject's request for implementation of his/her rights is examined by the Data owner appointed to coordinate the activity field of Personal data processing, to which the Data subject who submitted the request is attributed.
- 10.6. Upon receipt of the Data subject's request for information about the Personal data processed by the Company, the latter must provide the Personal data requested in writing or inform about the reasons for refusal to satisfy the request within the period of 30 days.
- 10.7. If upon familiarisation with his/her Personal data, the Data subject establishes that it is false, incomplete or inaccurate, he/she must send a written request to the Company for correction or supplement of the Personal data. Without any delay but in no event later than within 5 working days, the Company checks the Personal data and corrects false, incomplete, inaccurate Personal data and/or suspends processing of such Personal data (except storage).
- 10.8. If upon familiarisation with his/her Personal data, the Data subjects establishes that his/her Personal data is processed unlawfully or unfairly and applies to the Company, the latter must without any delay, but in no event later than within 5 working days check lawfulness, fairness of Personal data processing free of charge and destroy unlawfully or unfairly collected Personal data or suspend/restrict processing of such Personal data (except for storage) without any delay.
- 10.9. The Data subject has the right to disagree with his/her Personal data processing (when the basis for Personal data processing is the consent or legitimate interest). If the Data subject reasonably disagrees with his/her Personal data processing, the Data subject's data will not be processed or its processing will be discontinued and the Personal data will be destroyed.
- 10.10. Personal data is disclosed to third parties exclusively in the cases and by the procedure established by laws and other legal acts.
- 10.11. Upon a request of the Data subject, the Company must provide his/her Personal data or transmit it to the other Personal Data controller in a systemised, usually used and computer readable format, when the Data subject's Personal data is processed by the Company on the basis of the agreement or consent. Satisfying the request, exclusively the data that is related to the Data subject's data provided to the Company and to the data processed by the Company by automatic means is subject to movement.
- 10.12. The Data subject must inform the Company in writing about any changes in the Personal data.
- 10.13. The Data subject can appeal against the Company's actions (omission to act) related to the implementation of the Data subject's rights to the following supervising institution:

Estonian Data Protection Inspectorate
Address: 39 Tatari St., 10134 Tallinn
Telephone +372 627 4135
E-mail info@aki.ee

XI. FINAL CLAUSES

- 11.1. The Description comes into effect upon its approval by the head of the Company.
- 11.2. All Employees of the Company must be familiarised with this Description upon signed acknowledgement.
- 11.3. The Description can be reviewed once in a calendar year at the Data controller's initiative and/or in case of any changes in the legal acts regulating Personal data processing.
- 11.4. Amendments to the Description will come into effect from the day of their approval.
- 11.5. The Company, its Employees, Personal Data processors are responsible for disregard and breach of the requirements of the Description by the procedure established by the effective legal acts.

Annexes:

- No. 1. Information notice (for employees).
- No. 2. Information notice for data from third parties.
- No. 3. Consent to personal data processing.
- No. 4. Information notice to shareholders, gov. body members, beneficiaries.
- No. 5. Information notice to authorized persons, agents.