

	DOCUMENT TITLE: European Safe Harbor Privacy Policy for Customer Information	
	GBS CATEGORY/SUBSECTION: Sales / Sales Force Effectiveness	
	EFFECTIVE DATE: January 31, 2014	SUPERCEDES: New Document
DOCUMENT OWNER: Jill L. Urey – Assistant General Counsel		APPROVED BY: Kent K. Matsumoto – Vice President, General Counsel & Corporate Secretary
SCOPE: Enterprise-wide	DOCUMENT STATUS: APPROVED	NEXT REVIEW DATE: January 1, 2015

POLICY

P. H. Glatfelter Company (“the Company”) strives to collect, use and disclose customer personal information (defined below) in a manner consistent with the laws of the countries in which it does business. The Company abides by the *Safe Harbor Principles* developed by the U.S. Department of Commerce and approved by the European Commission on July 26, 2000. This European Safe Harbor Privacy Policy for Customer Information (the “Privacy Policy”) sets forth the privacy policies that the Company follows for the transmission of all Company customer personal information in whatever format (including electronic, paper or verbal) to the United States, Canada, China, Philippines, Russian and any other country where the Company does business from locations within the European Economic Area (“EEA”), whether via telecommunication lines, computer lines, or in hard copy, whether provided by customers, generated by the Company and its subsidiaries or otherwise provided by agents or third parties.

PROCEDURE

I. Definitions

As used in this Policy:

“Customer personal information” means any data or information relating to an identified or identifiable person with whom the Company does business, either in their personal capacities or as representatives of customer institutions, suppliers or other businesses that is maintained as an electronic record or in a relevant filing system, including contact lists maintained by the Company’s sales representatives. For this purpose, “does business” includes a person who enters personal information on a Company website. This definition covers information that, when associated with a specific individual, may be used to identify him or her, including, but not limited to, name, title, home address, telephone number, email address, gender, birth date, telephone and telecommunication records and the role the person plays on behalf of his or her employer in the employer’s business relationship with the Company.

*Document current when printed.
Consult the Glatfelter Business System to ensure most current revision.*

DOCUMENT TITLE European Safe Harbor Privacy Policy for Customer Information	
DOCUMENT OWNER Jill L. Urey – Assistant General Counsel	EFFECTIVE DATE January 31, 2014

“Agent” means any third party that uses customer personal information provided by the Company to perform tasks on behalf of and under the instruction of the Company.

II. Privacy Principles

The following privacy principles are based upon the *Safe Harbor Principles*.

NOTIFICATION, COLLECTION, USE, AND RETENTION OF CUSTOMER PERSONAL INFORMATION: The Company collects, uses and retains customer personal information only if such information is necessary and appropriate for legitimate business and legal purposes.

When the Company collects customer personal information directly from individuals in the EEA, it will inform them about the purposes for which it collects and uses personal information about them, the types of non-agent third parties to which the Company discloses that information and the choices and means the Company offers for limiting its use and disclosure. Notice will be provided in clear and conspicuous language when individuals are first asked to provide such information to the Company, or as soon as practicable thereafter, and in any event before the Company uses the information for the purpose other than that for which it was originally collected.

When the Company receives customer personal information from its subsidiaries, affiliates, agents and other entities in the EEA, it will use such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such information relates.

Individual customer personal information is used by and shared among Company divisions, subsidiaries, affiliates, agents (e.g., IT and other professional and nonprofessional services providers, etc.), applicable government organizations and agencies, and third parties as permitted or required by law, regulation or court order.

CHOICE: The Company offers to its customers the opportunity to choose (opt-out) whether their customer personal information may be (a) disclosed to a non-agent third party, or (b) used for a purpose other than the purpose for which it was originally collected or subsequently authorized.

DATA INTEGRITY: The Company will use customer personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized. The Company will take reasonable steps to ensure that customer personal information is relevant to its intended use and is accurate, complete and current.

TRANSFER TO AGENTS: The Company obtains assurances from its agents that they will safeguard customer personal information consistently in accordance with this Privacy Policy. Examples of appropriate assurances include, but are not limited to, the following: (a) a contract, agreement or relevant provision obligating the agent to provide

*Document current when printed.
Consult the Glatfelter Business System to ensure most current revision.*

DOCUMENT TITLE European Safe Harbor Privacy Policy for Customer Information	
DOCUMENT OWNER Jill L. Urey – Assistant General Counsel	EFFECTIVE DATE January 31, 2014

at least the same level of protection as is required by the relevant *Safe Harbor Principles*; (b) separate Safe Harbor certification by the agent; or (c) being subject to a European Commission adequacy finding. Where the Company has knowledge that an agent is using or disclosing customer personal information in a manner inconsistent with this Privacy Policy, the Company will take reasonable steps to prevent or stop the use or disclosure.

SECURITY: The Company maintains systems and procedures to assure the security and integrity of customer personal information, whether provided by customers or customer representatives, generated by the Company and its subsidiaries, or otherwise provided by agents or third parties.

The Company will take reasonable precautions to protect customer personal information in its possession from loss, misuse, and unauthorized access, disclosure, alteration or destruction. Customer personal information is made available within the Company only to those persons who possess a business need-to-know.

ACCESS: Upon request, and subject to the laws of the country in which the request is made, the Company will grant individuals reasonable access to their customer personal information. In addition, the Company will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

ENFORCEMENT: The Company conducts assurance reviews in the form of periodic compliance audits and surveys of sales representatives and others who manage customer personal information. This is to verify adherence to this Privacy Policy and to support annual Safe Harbor compliance certifications to the US Department of Commerce.

All reported violations or potential violations will be investigated by the Legal Department (and such designees as the Legal Department may appoint), which will take such actions as are deemed appropriate in the investigation and, if necessary, remediation of the violation. Any employee that the Company determines to be in violation of this Privacy Policy may be subject to disciplinary action up to and including termination of employment. With respect to any complaints relating to the Privacy Policy that cannot be resolved through the Company's internal procedures, the Company will participate in the dispute resolution procedures of the panel established by the European Union Data Protection Authorities to resolve disputes pursuant to the *Safe Harbor Principles*.

III. Changes to Our Privacy Policy

This Privacy Policy may be amended from time to time, consistent with the requirements of the *Safe Harbor Principles*. Appropriate public notice will be given concerning such amendments.

*Document current when printed.
Consult the Glatfelter Business System to ensure most current revision.*

DOCUMENT TITLE European Safe Harbor Privacy Policy for Customer Information	
DOCUMENT OWNER Jill L. Urey – Assistant General Counsel	EFFECTIVE DATE January 31, 2014

IV. Contact

Questions or comments regarding this Privacy Policy should be submitted by mail to:

P.H. Glatfelter Company
Attn: General Counsel
96 S. George Street, Suite 500
York, PA 17401

*Document current when printed.
Consult the Glatfelter Business System to ensure most current revision.*