



## **Privacy Notice for Business Partners**

We, an affiliate of the Glatfelter group (“Glatfelter,” “Company,” “us,” “we,” or “our”), are committed to protecting your personal data responsibly and in compliance with applicable privacy and data protection laws. This Privacy Notice for our Business Partners (“Privacy Notice”) describes the personal data we collect, how the Company uses your personal data, with whom we share such data, and how you can contact the Company, access your personal data and exercise your other rights in respect of your personal data. This Privacy Notice also describes the security measures the Company employs to protect your data.

“Processing” in this context means 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

This Privacy Notice does not address our online practices. For more information on Glatfelter’s online privacy practices, please visit [http://www.glatfelter.com/Files/about\\_us/Privacy-Policy.pdf](http://www.glatfelter.com/Files/about_us/Privacy-Policy.pdf).

### **1. Identifying the Controller of Your of Personal Data**

Whenever an affiliate of Glatfelter processes your personal data for its own purposes, that affiliate is considered a controller of the personal data and therefore, is primarily responsible for meeting the requirements of applicable data protection laws.

Unless informed otherwise at the time when your personal data is collected, the Glatfelter affiliate acting as controller of your personal data will be the one located in your country of establishment. Below you will find a list of our affiliates and the respective Company contact information and the contact details of our Data Protection Officer and Coordinators.

### **2. Collection of Personal Data**

The Company collects from you certain personal data related to you (“Personal Data”). This includes personal and business contact information, such as your name, address, telephone numbers, and email addresses as well as other Personal Data as set out in detail in Annex 1 to this Privacy Notice.



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You will be informed what Personal Data is contractually required and what Personal Data you may optionally supply when you enter into a contractual arrangement with the Company. Please note that, should you decide not to provide your Personal Data, it may impact our ability to render services to you or interact or conduct business with you.

### **3. Purposes of Collection, Processing and Use**

The Company values your privacy and processes your Personal Data in accordance with applicable law, including the European Union (“EU”) General Data Protection Regulation (“GDPR”) and, where applicable, the Russian Federal Law No 152-FZ “On Personal Data” dated July 27, 2006 (as amended) (the “Russian Data Protection Law”). Processing your Personal Data includes collecting, organizing, retrieving, using, storing, recording, transferring, adapting, summarizing, consolidating, amending, sharing, blocking and destroying your Personal Data as necessary under the circumstances or as otherwise required or permitted by law.

The Company processes your Personal Data in order to administer and manage our relationship with you, as well as to evaluate, review, approve, or enter into potential contractual arrangements with you and verify the correct execution of them. The Company may also process your Personal Data to comply with certain obligations under the law, industry guidelines and internal policies. Additionally, the Company will process your Personal Data to keep you informed about our activities, products and services we think may be of interest to you, as permitted by the applicable law or with your consent, where required. The purposes of the collection, processing and use are set out in detail in Annex 1 to this Privacy Notice.

### **4. Information We Share**

Your Personal Data may be processed on our behalf by, or shared with, the Company’s affiliates and their respective agents, suppliers, vendors, business partners, regulatory agencies that are located in the United States and in other countries inside and outside the European Economic Area (“EEA”) for the purposes outlined above. In these cases, the Company ensures that these third parties take appropriate technical and organizational measures to ensure an adequate level of data protection, in compliance with applicable legislation. For data transfers outside the EEA, an adequate level of data protection is currently safeguarded through Standard Contractual Clauses. A list of our affiliates is available at **[INSERT]**.



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Glatfelter currently shares your Personal Data with cloud-based and other software and service providers for hosting and maintenance as well as management of customer and enterprise relationship, market surveillance, expense reports, payment processing, travel and related arrangements, and accounting, among other legitimate activities and services.

The transfers of Personal Data to third-party providers are secured by implementing the safeguards required under the applicable law (including contractual arrangements entered into with third-party providers). For data transfers outside the EEA, the Company has implemented EU Standard Contractual Clauses to safeguard your Personal Data or relies on the certification of the respective provider under the EU-US Privacy Shield.

If you wish to obtain a copy of the safeguards implemented (here EU Standard Contractual Clauses or certification under the EU-US Privacy Shield), please contact us using the information provided below under “Contact Us.”

Generally, for data transfers outside the Russian Federation, a respective Company’s affiliate will comply with provisions of the Russian Data Protection Law (including Articles 6(3), 12 and 19) and will seek your consent, if necessary.

The Company does not sell or otherwise disclose your Personal Data, except as otherwise described in this Privacy Notice.

### **5. Security Measures**

We are committed to maintaining the security of your Personal Data submitted online and offline. The Company maintains appropriate physical, procedural, organizational and technical security measures intended to prevent loss, misuse, unauthorized access, disclosure, or modification of your Personal Data under the Company’s control. If you have reason to believe that your Personal Data is no longer secure, please notify the Company immediately using the information provided below under “Contact Us.”

### **6. Your Data Protection Rights**

To the extent required by applicable law, you are entitled to obtain information on the processing of your Personal Data, to object to processing of your Personal Data, make use of your right to data



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portability and to have your Personal Data rectified or deleted or its processing restricted. You also are entitled to withdraw any consent that you might have given with respect to the processing of your Personal Data at any time with future effect, including any consent for any direct marketing purposes. These are known as “Data Subject Rights.” If you would like to exercise your Data Subject Rights, please contact us using the information provided below under “Contact Us.”

The Company will respond to your request(s) without undue delay within the legally required period of time. To help protect your privacy, the Company takes reasonable steps to verify your identity before granting access to your Personal Data or responding to your requests.

If you are not satisfied with our response or believe we are not processing your Personal Data in accordance with the law, you also may contact or lodge a complaint with the competent supervisory authority or seek other remedies under applicable law.

### **7. Retention Period**

The Company takes reasonable steps to retain your Personal Data no longer than permitted under the applicable data protection laws and in any case, no longer than such Personal Data is necessary for the purpose for which it was collected or otherwise processed, unless a longer retention period is required by applicable law (“Data Retention Periods”). The Personal Data you provide to us for direct marketing purposes will be kept with us until you notify us that you no longer wish to receive marketing information. We will retain your Personal Data as long as:

a. We have an ongoing relationship with you (e.g., you are our customer or a supplier of goods or services to us);

b. Your Personal Data is necessary in connection with the lawful purposes set forth in this Notice, for which we have a valid legal basis (e.g., where your Personal Data is needed to maintain a contractual relationship between us and we have a legitimate interest in processing your Personal Data for the purposes of operating our business and fulfilling our obligations under a contract or where we have a legal obligation to retain your Personal Data). In addition, we will keep your Personal Data for any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant); and an additional three-month period following the



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end of the applicable limitation period so that if a claim is brought, we have a reasonable amount of time to identify any Personal Data in our possession relevant to the claim. Also, if any legal claim is brought, we may continue to process your Personal Data for such additional periods as are necessary in connection with the claim. You may also contact us using the details located in the “Contact Us” section below to learn more about our Data Retention Periods.

### 8. Updating Your Personal Data

Glatfelter strives to maintain your Personal Data in a manner that is accurate, complete and up-to-date. However, we encourage you to keep your Personal Data up-to-date and inform the Company of any significant changes to your Personal Data. Please contact the Company contact listed under “Contact Us” below if there are any changes in your Personal Data.

### 9. Updates to this Privacy Notice

The Company reserves the right to update or change this Privacy Notice or any part of it from time to time without prior notice. The Company encourages you to review this Privacy Notice periodically for changes. You may at any time contact us to request a copy of any, including the most recent version, of this Privacy Notice.

### 10. Contact Us

If you have any questions about this Privacy Notice, the Company’s processing of your Personal Data, or to make use of your rights as outlined above, please contact the Chief Compliance Officer at [GeneralCounsel@glatfelter.com](mailto:GeneralCounsel@glatfelter.com) or +01.717.225.4711.

<b>Your country of practice or work</b>	<b>Glatfelter entity acting as data controller (with contact details)</b>	<b>Contact details of Data Protection Officer/Company contact for data protection</b>
France (Scaër)	Glatfelter Scaër SAS BP2 29390 Scaër FRANCE Ph. +33 2 98 66 42 00	Corinne Jego Data Protection HR Representative Ph. +33 2 98 66 42 11 Email: Corinne.Jego@glatfelter.com
Germany (Berlin)	Glatfelter Berlin GmbH Potsdamer Platz 5 10829 Berlin GERMANY	Ernst Kraum Data Protection Officer Ph. +49 172 728 7412

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<b>Your country of practice or work</b>	<b>Glatfelter entity acting as data controller (with contact details)</b>	<b>Contact details of Data Protection Officer/Company contact for data protection</b>
	Ph. +49 7224 66 0	Email: Ernst.Kraum@glatfelter.com
Germany (Dresden)	Glatfelter Dresden GmbH Bergstr. 76 01099 Dresden GERMANY Ph. +49 3529 5540	Ernst Kraum Data Protection Officer Ph. +49 172 728 7412 Email: Ernst.Kraum@glatfelter.com
Germany (Falkenhagen)	Glatfelter Falkenhagen GmbH Rolf-Hövelmann Straße 10 16928 Pritzwalk GERMANY Ph. +49 33986 69323	Ernst Kraum Data Protection Officer Ph. +49 172 728 7412 Email: Ernst.Kraum@glatfelter.com
Germany (Gernsbach)	Glatfelter Gernsbach GmbH Hoerdener Straße 5 76593 Gernsbach GERMANY Ph. +49 7224 66 0	Ernst Kraum Data Protection Officer Ph. +49 172 728 7412 Email: Ernst.Kraum@glatfelter.com
Germany (Ober-Schmitten)	Glatfelter Ober-Schmitten GmbH Rhönstraße 13 Ober-Schmitten 63667 Nidda GERMANY Ph. +49 6043 808 101	Ernst Kraum Data Protection Officer Ph. +49 172 728 7412 Email: Ernst.Kraum@glatfelter.com
United Kingdom (Caerphilly)	Glatfelter Caerphilly Ltd. Pontygwindy Industrial Estate Caerphilly Mid Glamorgan CF83 3HU UNITED KINGDOM Ph. +44 29 20 885 988	Craig Chapman Data Protection HR Representative Ph. +44 1594 84 64 69 Email: Craig.Chapman@glatfelter.com
United Kingdom (Lydney)	Glatfelter Lydney Ltd. Church Road Lydney Gloucestershire GL15 5EJ UNITED KINGDOM Ph. +44 1594 842 235	Craig Chapman Data Protection HR Representative Ph. +44 1594 84 64 69 Email: Craig.Chapman@glatfelter.com



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### Annex 1

**NOTE:** Depending on your respective role or function with Glatfelter, not all of the below-listed data transfers will be applicable to you. If in doubt, contact the Chief Compliance Officer or applicable Company Contact for your respective country as described under “Contact Us.”

<b>Customer Data Processing</b>	
<b>Purposes of the Transfer</b>	
All Glatfelter Services/Departments	<ul style="list-style-type: none"> <li>• Customer relationship management, publications, newsletters, responses to marketing campaigns, reference customer list, key customer names</li> <li>• Customer training</li> <li>• Sales and service reporting and analysis</li> <li>• Delivery management (to track the shipping of products to customers)</li> <li>• Export control</li> <li>• Screening against government, supranational (e.g., EU or United Nations Security Council), and law enforcement agency sanctions lists or other legal restrictions</li> <li>• Product and technical inquiries (e.g., via “Contact us” form on website)</li> <li>• Access to Customer Support platforms</li> </ul>
<b>Categories of Data</b>	
All Glatfelter Services/Departments	<ul style="list-style-type: none"> <li>• Name, title, email address, physical address, phone numbers</li> <li>• Bank account information, customer account number, history and performance.</li> </ul>



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<b>Data Processing for Vendors, Advisors, Consultants and Other Professional Experts, Distributors and Retailers</b>	
<b>Purposes of the Transfer</b>	
Vendors	<ul style="list-style-type: none"> <li>• Contract management</li> </ul>
Advisors, Consultants and Other Professional Experts	<ul style="list-style-type: none"> <li>• Contract management</li> </ul>
Distributors and Retailers	<ul style="list-style-type: none"> <li>• Export control</li> <li>• Sales and service reporting and analysis</li> <li>• Customer relationship management and marketing activities</li> <li>• Technical support requests (for engineers with respect to installation/service support, by email)</li> <li>• Delivery management (to track the shipping of products to customers)</li> <li>• Procurement management (to track the purchase orders to suppliers)</li> <li>• Trainings, including applications, and, if necessary, Visa applications</li> <li>• Warranty claim reporting</li> <li>• Screening against government, supranational (e.g., EU or United Nations Security Council), and law enforcement agency sanctions lists or other legal restrictions</li> <li>• Credit worthiness</li> </ul>
<b>Categories of Data</b>	
Vendors	<ul style="list-style-type: none"> <li>• General contract information (including contract value)</li> <li>• Contact details of contact person at vendor: name, title, email address, physical address, phone number</li> </ul>





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Advisers, Consultants and Other Professional Experts	<ul style="list-style-type: none"> <li>• General contract information (including contract value)</li> <li>• Name, title, university or organization, email address, physical address, phone number</li> </ul>
Distributors and Retailers	<ul style="list-style-type: none"> <li>• For export control             <ul style="list-style-type: none"> <li>○ Contact details of contact person at distributor or retailer: name, title, email address, physical address, phone number</li> </ul> </li> <li>• For sales and service reporting and analysis             <ul style="list-style-type: none"> <li>○ Contact details of contact person at distributor or retailer: name, title, email address, physical address, phone number</li> </ul> </li> <li>• For customer relationship management and marketing activities             <ul style="list-style-type: none"> <li>○ Contact details of contact person at distributor or retailer: name, title, email address, physical address, phone number</li> </ul> </li> <li>• For technical support requests (for engineers with respect to installation/service support, by email)             <ul style="list-style-type: none"> <li>○ Name of support personnel, location data, company requesting</li> </ul> </li> <li>• For delivery management             <ul style="list-style-type: none"> <li>○ Names and contact details of responsible persons</li> </ul> </li> <li>• For procurement management             <ul style="list-style-type: none"> <li>○ Names and contact details of responsible persons</li> </ul> </li> <li>• For international trainings             <ul style="list-style-type: none"> <li>○ Persons (to be trained) name, email address, postal address, detailed passport information (i.e., name, residence address, date of birth, etc.)</li> </ul> </li> <li>• For warranty claim reporting</li> </ul>



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	<ul style="list-style-type: none"><li>○ Names and contact details of responsible persons</li></ul>
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