

Compliance with the General Data Protection Regulation

International Paper is one of the world's leading producers of fiber-based packaging, pulp and paper. At International Paper, our approach to privacy and data protection begins with our values: we are committed to doing the right thing, for the right reasons, all the time.

Background

The European General Data Protection Regulation (the "GDPR"), effective May 25, 2018, sets new standards for how companies use and protect the personal data of European Union citizens. While the GDPR does not introduce many new concepts, it does increase the compliance responsibilities on controllers and processors of personal data. We are committed to taking the steps necessary to ensure that our compliance program meets the accountability and transparency requirements of the GDPR and supports our customers' compliance obligations.

Data Privacy Governance Structure

International Paper has established a data-privacy-governance structure for adhering to the GDPR's data governance obligations and other related legal requirements. International Paper's compliance structure includes an executive-level team that provides oversight of the program, working teams in the United States and Belgium, and a EU Data Privacy Counsel. Each of our European operating facilities will have data privacy champions to act as liaisons with the data-privacy-governance team.

How We Process Your Personal Data

When International Paper processes the personal data of our customers, we will comply with the GDPR's obligations imposed on controllers and processors. International Paper will:

- process data only for the purposes of negotiating, or complying with the terms of, agreements entered into with our customer or in response to specific requests or instructions from our customer;
- ensure that employees, agents, and sub-processors authorized to process personal data have committed to confidentiality and compliance with all data protection laws;
- ensure that privacy is considered in all aspects of planning and implementing processes; establish appropriate data protection principles;
- maintain appropriate physical, technical, and organisational measures to ensure a level of security appropriate to the potential harm from accidental or unlawful destruction or accidental loss; alteration, unauthorized disclosure, or access; and/or any other unlawful forms of processing;

- ensure compliance with applicable data protection laws, including having adequate mechanisms in place to protect our customer's personal data when it is transferred internationally (e.g., model clauses, standard contractual clauses) ;
- not, to the extent permitted by applicable law disclose customer personal data to any third party without consent of the customer;
- maintain procedures to ensure that unauthorized persons will not have access to customer's personal data;
- delete, to the extent permitted by applicable law, all personal data as requested by the customer at the end of the business relationship;
- reasonably assist the customer with fulfilling the customer's obligations to respond to data subject rights requests; and
- make available to the customer evidence of International Paper's compliance with the GDPR, subject to any statutory obligations and to business secrecy.

Data Security and Breach Notifications

International Paper has established technologies and processes to protect computers, networks, and data from cyber-security threats. In the event of a data breach, International Paper will notify all affected customers without undue delay after becoming aware of such breach. The notification will:

- describe the nature of the personal data breach including, where possible, the categories and approximate number of data subjects and personal data records affected;
- communicate the name and contact information from whom customers may request information;
- describe, to the extent possible, potential consequences of the personal data breach; and
- describe the measures taken or proposed to be taken to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

When it is not possible to provide the above information during the initial notice, the information may be provided in phases without undue delay.

Employee Data Protection Awareness and Training

Making employees aware of the compliance expectations associated with the GDPR helps build a culture that values the protection of personal data. International Paper has prepared communications, training, policies, and an internal My-Privacy portal so that our workforce will recognize and properly handle personal data during their day-to-day activities.

Contact Our Data Privacy Team

International Paper is building a GDPR program that recognizes the necessity of continuous monitoring of compliance. Any questions regarding International Paper's GDPR program should be directed to My-Privacy@ipaper.com.