



# Privacy Policy

West Fraser 2024



**West Fraser**



## Privacy Notice

This is the privacy notice of West Fraser Europe Limited. In this document, “we”, “our”, or “us” refer to West Fraser Europe Limited.

We are company number Company Registration Number 357722, registered in England. Our registered office is at Hill Village, South Molton, Devon EX36 4HP.

## Introduction

This privacy policy is for this website, it explains how we comply with the GDPR (General Data Protection Regulation) and the PECR (Privacy and Electronic Communications Regulations).

1. This policy sets out the information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”). In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.
2. At West Fraser Europe Ltd, we take your privacy seriously and are committed to protecting and respecting your privacy ensuring we take all steps to be as transparent as possible on what data we hold, why we hold it, what we do with it and how long we hold it for.
3. We undertake to preserve the confidentiality of all information you provide to us.
4. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
5. The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.





## The bases on which we process information about you

The law requires us to determine under which of the six defined bases (consent; contract; legal obligation; vital interests; public task; or legitimate interests), we process various categories of your personal information, and to notify you of the basis for each category.

If a base on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the base changes, then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.



## Information we process because we have a contractual obligation with you

When you create an account with West Fraser Europe Ltd, buy a product from us, or enter into an agreement to provide a service for us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to conduct our obligations under that contract, we must process the information you give us. Some of this information may be personal or sensitive information. e.g.

- **Name and address.**
- **Contact information, including e-mail addresses and telephone numbers.**
- **Demographic information such as postcode, preferences and interests.**
- **Bank details.**

We may use it in order to:

- 1.1. **Verify your identity for security purposes.**
- 1.2. **Sell products to you.**
- 1.3. **Provide you with our services.**
- 1.4. **Provide you with suggestions and advice on products, services and how to obtain the most from using our website.**





We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you, as an individual, will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract. This information will then be processed and held securely in line with retention periods.

## Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including job opportunities and our products and services, you provide your consent to process information that may be personal information.

You are deemed to have given your consent implicitly, when you send us a message by e-mail to which you would reasonably expect us to reply.

Except, where you have consented to the use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at [datacontrollerGDPR@Westfraser.com](mailto:datacontrollerGDPR@Westfraser.com)

However, if you do so, you may not be able to use our website or our services further.





## Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do so after having given careful consideration to:

- Whether the same objective could be achieved through other means
- Whether processing (or not processing) might cause you harm
- Whether you would expect us to process your data, and whether you would, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- Record-keeping for the proper and necessary administration of our business
- Responding to unsolicited communication from you to which we believe you would expect a response.
- Protecting and asserting the legal rights of any party
- Insuring against or obtaining professional advice that is required to manage business risk.
- Protecting your interests where we believe we have a duty to do so.



## Information we process because we have a legal obligation

At times, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities. If they so request or if they have the proper authorisation such as a warrant or court order.

This may include your personal information.





## Information provided on the understanding that it will be shared with a third party

Our website allows you to post information with a view to that information being read, copied, downloaded, or used only by us to get back in touch with you.

## Complaints regarding content on our website

Our website is a publishing medium. Anyone may register their details with us, to pursue, only for legitimate business reasons. We control all content that is posted on our website and social media prior to publication.

If you complain about any of the content on our website, we shall investigate your complaint.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.



## Information relating to your method of payment

Access to your payment /receipt of payment information is restricted to authorised staff only and is not provided via our website.



## Job application and employment HR

If you send us information in connection with a job application, we may keep it for up to six months in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.





## Sending a message to our support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.



## Complaints

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact a third party, we may decide to give them some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

If you are not happy with our privacy policy or if you have any complaint, then you should tell us by email.

If a dispute is not settled, we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns> or in writing to:

**Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF



## Cookies

West Fraser Europe Ltd will ensure that any information accessed or provided through these sites remains secure. In order to facilitate navigation on the West Fraser Europe Ltd website and those of its subsidiaries and preserve settings between visits, West Fraser Europe Ltd may use “cookie” technology. West Fraser Europe Ltd does not use cookies to store information about its visitors. Cookies are small pieces of data stored by Internet browser on a computer’s hard drive, which makes browsing easier when pages are revisited. Web browsers may be set to notify the user when a cookie is received or to prevent cookies from being sent. Please note, however, that by not accepting cookies, the functionality provided to visitors to these sites may be limited.



## Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

## Access to your personal information

1. At any time you may review or update personally identifiable information that we hold about you.
2. To obtain a copy of any information that is not provided on our website you may send us a request at [datacontrollerGDPR@Westfraser.com](mailto:datacontrollerGDPR@Westfraser.com)
3. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.



We use technology in order to better understand our users’ needs and to optimise this service and experience. We use a technology service that helps us better understand our users’ experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our service with user feedback. We uses cookies and other technologies to collect data on our users’ behaviour and their devices. This includes a device’s IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website.





## Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to ensure we safeguard your information.



## Use of site by children

We do not sell products or provide services for purchase by children, nor do we market to children.

## Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

1. To provide you with the services you have requested.
2. To comply with other law, including for the period demanded by our tax authorities.
3. To support a claim or defence in court.

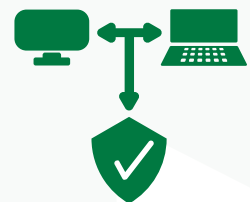


## Data transfers outside the EU

West Fraser Europe Ltd, is part of West Fraser Ltd which is a Canadian company therefore data will be transferred between the United Kingdom and Canada.

West Fraser Europe Ltd has put recognised procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of any personal data that is transferred to countries outside the EU including Canada.

Diligence checks are conducted to ensure that such countries have the necessary safeguards in place, provide enforceable data subject rights and offer effective legal remedies for data subjects where applicable.





## Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.



## Review of this privacy policy

We may update this privacy notice from time to time, as necessary. The terms that apply to you are those posted here, on our website, on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at [datacontrollerGDPR@Westfraser.com](mailto:datacontrollerGDPR@Westfraser.com)