

# SAFE HARBOR POLICY

## POLICY

Weyerhaeuser Company complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as developed by the U.S. Department of Commerce regarding the collection, use and retention of personal information from European Union member countries and Switzerland. Weyerhaeuser has certified that it adheres to the Safe Harbor Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. Weyerhaeuser Company's Safe Harbor Policy is set forth below. To learn more about the Safe Harbor program, and to view Weyerhaeuser's Safe Harbor certification, please visit <http://www.export.gov/safeharbor/>.

## General Information

Personal data or personally identifiable information is any information relating to an identified or a reasonably identifiable natural person and recorded in any form (electronic or paper). This includes name, address, identification number or factors relating to an individual's physical, physiological, mental, economic, cultural or social identity. This includes personal data about current and past employees, and their respective family members, within the EU or Switzerland.

This policy applies to all employees who use, maintain, manage, or store personally identifiable information related to individuals within the EU or Switzerland.

The purpose of this policy is to ensure uninterrupted data flows of personally identifiable information that are necessary for the proper function of Weyerhaeuser's business.

## Policy

It is Weyerhaeuser's policy to abide by the Safe Harbor Principles and requirements for personally identifiable information transferred to the US from the EU or Switzerland as summarized below, subject to exceptions under the Safe Harbor Framework that allow different treatment of personally identifiable information in particular circumstances.

- **Notice:** Where Weyerhaeuser US collects personally identifiable information directly from individuals in the EU or Switzerland, Weyerhaeuser must inform such individuals about:
  - The purposes for which it collects and uses the information about them;
  - How to contact Weyerhaeuser with any inquiries or complaints;
  - The types of third parties to which Weyerhaeuser discloses the information; and
  - The choices and means Weyerhaeuser offers individuals for limiting the use and disclosure of their personally identifiable information.

This notice must be provided to individuals in clear and conspicuous language when they are first asked to provide personally identifiable information to Weyerhaeuser, or as soon thereafter as is practicable. In any event, the notice must be provided before Weyerhaeuser uses such information for any purpose other than for which it was originally collected. Where Weyerhaeuser receives personally identifiable information from its subsidiaries, affiliates or other entities in the EU or Switzerland, it will use such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such personally identifiable information relates.

- **Choice:** Weyerhaeuser must offer individuals the opportunity to choose (opt out) whether their personally identifiable information is (a) to be disclosed to a third party or (b) to be used for a purpose that is incompatible with the purpose(s) for which it was originally authorized by the individual. Individuals must be provided with clear and conspicuous, readily available, and affordable mechanisms to exercise choice. For sensitive information, affirmative or explicit choice (opt in) must be given if the information is to be disclosed to a third party or used for a purpose other than its original purpose or the purpose authorized subsequently by the individual.
- **Onward Transfer (Transfers to Third Parties):** Before disclosing information to a third party, Weyerhaeuser must apply the Notice and Choice Principles. In those cases where Weyerhaeuser wishes to transfer information to third parties, Weyerhaeuser must first obtain written assurances from them that they meet the Safe Harbor Principles. In the absence of such written assurances, Weyerhaeuser must have contracts in place with third parties requiring that they provide at least the same level of privacy protection as is required by the relevant Safe Harbor Principles. Where Weyerhaeuser has knowledge that a third party is processing information contrary to this policy, Weyerhaeuser must take reasonable steps to prevent or stop

such processing or ensure processing is compliant.

- **Access:** Upon request, Weyerhaeuser will provide individuals with reasonable access to personally identifiable information about them that Weyerhaeuser holds. Weyerhaeuser will provide individuals with the ability to correct, amend, or delete that information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.
- **Security:** When Weyerhaeuser creates, maintains, uses or disseminates personally identifiable information, it must take reasonable precautions to protect it from loss, misuse and unauthorized access, disclosure, alteration and destruction.
- **Data Integrity:** Weyerhaeuser must use personally identifiable information only in ways that are relevant for and compatible with the purposes for which the information has been collected or subsequently authorized by the individual. Weyerhaeuser must take reasonable steps and exercise good business judgment to ensure that data is reliable for its intended use, accurate, complete, and current.
- **Enforcement:**
  - Weyerhaeuser is committed to satisfactorily resolving individuals' privacy concerns in a manner consistent with the Safe Harbor Principles.
  - Individuals should be encouraged to seek recourse inside Weyerhaeuser before taking complaints to an independent dispute resolution resource (either a private sector program or the European Data Protection Authorities or the Swiss Federal Data Protection and Information Commissioner). Weyerhaeuser employees in the EU or Switzerland may contact their HR representative or the Ethics and Business Conduct Office for privacy-related concerns.
  - Once internal resources have been exhausted, Weyerhaeuser will participate in complaints to credible private sector dispute resolution programs. Weyerhaeuser will also take the necessary steps to ensure that it cooperates with the European Data Protection Authorities or the Swiss Federal Data Protection and Information Commissioner, as applicable, with respect to disputes involving personal data.
  - Weyerhaeuser will annually self-certify its compliance with the principles of the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as developed by the U.S. Department of Commerce and will verify its compliance on an annual basis through an internal self-assessment review process.

Leaders are responsible for:

- training employees to protect personally identifiable information according to the Safe Harbor Principles and
- enforcing compliance by the employees who report to them.

Employees who handle personally identifiable information for employees in the EU or Switzerland must comply with the Safe Harbor Principles. They should work with their supervisor to understand how this policy impacts their job and their organization's specific rules for protecting personally identifiable information.