

# RISI Contributed Data Protection Protocol

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## Summary

RISI manages several programs wherein participants contribute confidential proprietary data to RISI so that RISI can aggregate data from multiple contributors for publication.

RISI understands that participants in these programs do so only with assurance that their data must be completely confidential and secure. To ensure this confidentiality and security, RISI has implemented procedures designed to limit access to confidential data and specifically prevent access to the data by editors, economists and cost benchmarking engineers.

## Definitions

*Confidential Contributed Data (CCD)* = Data contributed by participants in a service. For instance, cost and inventory data submitted by Bench\$mart participants is classified as CCD; prices submitted as part of RISI's weekly export price assessment is classified as CCD.

*Confidential Contributed Data Administrator (CCDA)* = Employee who has access to CCD.

Upon gaining CCDA access, employees must undergo data protection training and sign a statement of compliance.

CCDAs include:

- Data analysts who are not responsible for survey-based price discovery in PPI Pulp & Paper Week or other publications, and are not involved with providing data for RISI's Mill Cost Benchmarking service
- RISI IT staff
- RISI's News, Markets & Prices division head

## Operational procedures

- CCD are collected via a dedicated email address, e.g. [rcp.data@risi.com](mailto:rcp.data@risi.com), secure ftp site; or secure web site. Only CCDAs have access to data or documents submitted through these methods.
- CCD are put into a database by a data analyst who is a CCDA.

- The database is password-protected and accessible only by CCDAs.
- All CCDAs must undergo data protection training each year and sign a statement of compliance.

## Presentation of data

CCD will only be published in aggregated form. Data are never presented in such a way that, in spite of being aggregated,...

- identities of individual companies or mills could be deduced
- whether a given company or mill is included in a given dataset could be deduced

This means that if a minimum number of data points isn't included, an aggregate number will not be produced.

## Other uses of data

- Individual company or mill data may be analyzed and aggregated in other ways, for instance, in the case of Bench\$mart data, to find correlations between mill size and procurement cost. As above, such information will never be presented in a way that individual company or mill data can be deduced or even that an individual company or mill's inclusion in the data set can be deduced.
- Aggregated Bench\$mart prices or weekly export prices will be used to check prices published in PPI Pulp & Paper Week (PPW). If significant discrepancies are found, Bench\$mart data would not directly affect the PPW prices, but rather would serve as a signal that we need to examine the reporting methodology and data sources of the given grade and region. For instance, if Bench\$mart prices suggested that PPW prices were \$10 too high for a given grade and region, we would not adjust PPW prices by \$10. Instead, we would examine our data sources and methodology in that region to try to find the reason for the discrepancy.
- Aggregated Bench\$mart prices may be used in other RISI products, but individual company or mill data will never be used in other products.

If you have questions, concerns or suggestions about this protocol, please contact Todd Petracek, VP of News & Prices at [tpetracek@risi.com](mailto:tpetracek@risi.com), +1 781-734-8915.