

SIG Privacy Notice

Last updated: May 2021

This privacy notice defines what personal data we collect, process and use from visitors to our www.sig.biz website (the “**website**”) and other communication services referring to this privacy notice (together referred to as “**services**”).

The operator of the services is SIG International Services GmbH (“**SIG**”, “**we**”, “**our**” or “**us**”). The content of the website is provided by SIG Combibloc Group AG.

Unless you are receiving communication from a specified company of the SIG Combibloc Group, SIG is responsible for the collection, processing or use of your personal data.

Personal data

Personal data is all data that can – directly or indirectly – be used to identify you personally, such as your name, address, telephone number or e-mail address; other data such as your IP address may also qualify as personal data. It does not include aggregated information maintained in a form that is not capable of being associated with or reasonably linked to you.

How we collect your personal data

You can use our online presentation without disclosing your personal data. When you access our services, data may be automatically stored and processed, for example, for technical reasons, for security purposes or to provide a great user experience.

In addition to the purely informational use of our services, we offer various options that you may use if you are interested. To do this, you will usually need to provide further personal data that we need to provide the respective service. Such personal data is provided voluntarily by you. You are free to choose what personal data you want to provide to us or whether you want to provide us with any personal data at all. However, some personal data, such as your name, address and information on your requested services, may be necessary for the performance of our contractual obligations. Without providing this personal data, you will not be able to use certain services. For example, when you contact us by e-mail or via the contact form on our website.

Personal data we collect

- **If you merely use our services.** Your device ID, device type, model and manufacturer, operating system brand and model, approximate geo-location information based on your IP address, computer and connection information such as the device type, browser data including browser type and language, operating system, site preferences and information on your usage of our services including pages you view, the links you click and other actions you take on the services and referring/exit pages and URLs, ad data, IP address and standard web log information.
- **If you contact us via our services.** Name, email address and information on our communication with you, and any additional information you provide us with.
- **If you subscribe for our promotional emails.** Name, email address, your job function, your company, your country and the language of the newsletter.

Why we collect and use your personal data and the legal basis for our processing

The reasons for using your personal data may differ depending on the purpose of the collection. Regularly, we use your personal data for the following purposes:

- **Performance of contract.** If you use our services or if you contact us to request our services via our website or services, we use your personal data to provide you with these services and information.
- **Pursuit of legitimate interests.** The usage of your personal data may be necessary for our own business interests. For example, we may use some of your personal data to evaluate and review our business performance, improve and optimize our services, conduct research, provide advertising and send technical notices, updates and security alerts, or to identify potential cyber security threats. We may use your personal data for marketing purposes, for example, to send you personalized advertisement and to qualify, such as IP address. If necessary, we may also use your personal data to pursue or defend ourselves against legal claims. Please also see the section “Cookies and other Tracking Technologies” for further information regarding the purposes of use in relation to cookies and other tracking technology.
- **Consent.** In some cases, we may ask you to grant us separate consent to use your personal data. Please see “How to withdraw consent for our use of Tracking Technology” and “Your rights” regarding the choices and rights you have in this respect.

- **Compliance with legal obligations.** We are legally required to retain certain information, for example, tax or commercial laws, or we may be required by law enforcement to provide personal data on request.

Cookies and other Tracking Technologies

When using our services, we and our third-party partners may automatically collect certain types of usage information. For this purpose, we often rely on tracking technologies, including cookies, web beacons, embedded scripts and similar technology (collectively, “**Tracking Technologies**”) in accordance with this privacy notice. We may use cookie banners to obtain your consent for using our Tracking Technologies.

- **How these Tracking Technologies work.** Cookies are small text files that are stored on the hard drives of your devices (such as computers or smartphones) and through which we receive certain information. Cookies store certain settings and data to exchange with our system via your browser. A cookie usually contains the name of the domain from which the cookie has been placed, as well as information about the age of the cookie and a random alphanumeric identifier, the so-called cookie-ID. They help to recognize the device and make any pre-settings immediately available. Web beacons are small graphical images that may be included on our sites and typically work in conjunction with cookies to identify our users and user behavior. An embedded script is a programming code that is designed to collect information about your interactions with the site, such as the links you click on. The code is temporarily downloaded onto your computer or device from our web server or a third-party service provider, is active only while you are connected to the site and is deactivated or deleted thereafter. Flash cookies are pieces of data that websites that use Adobe Flash may store on a user's computer or device. Third parties with whom we partner to provide certain features on our sites or to display advertising based upon your web browsing activity often use flash cookies.
- **What information these Tracking Technologies collect.** These Tracking Technologies collect information about your browser and online usage patterns (e.g., IP address, pages you view, the links you click and other actions you take on the services such as opening an email, log files, browser type, browser language, referring/exit pages and URLs, site preferences etc.), and information about the device(s) you use to access the services (e.g., your device ID, device type, model and manufacturer, operating system brand and model and, depending on your mobile device settings, your approximate geo-location data based on your IP address). We, or our third-party partners, may link your various devices so that content you see on one device can result in

relevant advertising and content displayed on another device so that we may recognize and contact you on the various devices you may use.

- **The purpose of use of Tracking Technologies.** Tracking Technologies serve many different purposes, like helping us understand how our services are being used, helping us analyze trends, administering the services, tracking users' movements around the services, gathering demographic information about our user base as a whole, letting you navigate between pages efficiently, remembering your preferences and generally improving your browsing experience. Tracking Technology can also help ensure that you see marketing content that is more relevant to you and your interests. Therefore, generally speaking, we use the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the services(s); (b) provide custom, personalized content and information, including targeted content and advertising; (c) recognize and contact you across multiple devices; (d) provide and monitor the effectiveness of our services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage and demographic patterns on our services; (f) diagnose or fix technology problems; and (g) otherwise plan for and enhance our services.
- **How long the cookies stay on your browsing device.** The length of time a cookie will stay on your browsing device depends on whether it is a "persistent" or "session" cookie. Session cookies will only stay on your device until you stop browsing the website that has set the cookie. Persistent cookies stay on your browsing device after you have finished browsing a particular website, until they are deleted or until they expire. The actual period of validity of each persistent cookie depends on each cookie.
- **Third party cookies.** Some cookies belong to us, and we place them on your device. Other cookies are placed on your browsing device by third parties when you visit our services (please see further descriptions below under "Categories of Cookies"). Third parties set cookies to provide a service to us or to support a function on our services, but we do not always control how third-party cookies are used. You should check the third party's website for more information about how they use cookies.
- **How to manage cookies.** The cookies we use are designed to help you get the most from our services, but if you do not wish to receive cookies, most browsers allow you to configure your browser settings to suit your preferences and, for example, automatically refuse to accept third-party cookies or all cookies or be notified if you receive a cookie. Please check your browser and browser settings to determine where cookies are stored and whether and how they may be deleted. The help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie or

how to disable most cookies altogether. Depending on your mobile device and operating system, you may not be able to delete or block all Tracking Technologies. Please note that in the case you delete existing cookies, your chosen pre-settings will be deleted as well. This means that the next time you access our services, we may ask for your consent again (to the extent required by law) and set new cookies. The period of validity of those cookies will then start from the beginning. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it. In order to understand these settings, the following links may be helpful, otherwise you should use the “Help” option in your browser for more details.

- Cookie settings in [Internet Explorer](#)
- Cookie settings in [Firefox](#)
- Cookie settings in [Chrome](#)
- Cookie settings in [Safari](#)

If you want to limit third-party advertising cookies, you can also turn such cookies off by visiting the following links (please bear in mind that there are many more companies listed on these sites than those that drop cookies via our services):

- Your Online Choices (<http://www.youronlinechoices.com/>)
- Network Advertising Initiative (<http://www.networkadvertising.org/>)
- Digital Advertising Alliance (<http://www.aboutads.info/consumers>)
- TRUSTe’s Opt-out Tool (<http://preferences-mgr.truste.com>).

You can also choose to disable existing cookies and you can also avoid Tracking Technology by not consenting to the use of Tracking Technology when asked for consent in cookie banners.

However, please note that you may not be able to use all functions of our services if you choose to refuse cookies.

- **How to withdraw consent for our use of Tracking Technology.** We would like to obtain your consent to use various Tracking Technology in order for us to increase the user-experience on our services and/or provide you with personalized ads when you visit other services. To the extent we rely on your consent to provide you with targeted advertising on third-party websites and the use of Tracking Technology, you may withdraw such consent at any time with effect for the future. For this purpose, you can select your preference using the cookie banner’s “change settings” function. Depending on your setting preferences and the scope of your consent withdrawal, you may still receive generic ads.
- **Legal Basis for the processing of data collected via Tracking Technology.** Our legal basis of processing the data collected by cookies is based on your consent and our legitimate interest to provide you with the services on our website.

Categories of Cookies and the purpose of their use

The cookies we use on our website fall into three categories. For cookies that are not necessary cookies as set out below, we need your consent in order to start using the cookies. The categories are:

Marketing cookies

We use these cookies to present you with relevant content not only on our services but also websites. We use first and third-party cookies on our website to provide you with advertisements that we believe are relevant to you and your interests. You may see these advertisements on our website and on other websites you visit. We use the following marketing cookies on our website:

- LinkedIn retargeting pixel,
 - The purpose is to provide you with our ads on LinkedIn, if you have visited our website.
 - LinkedIn collects and processes the following personal data: URL, referrer, IP address, device and browser characteristics, when you visit LinkedIn.
 - LinkedIn is controller of the data: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland.
 - The data is stored for 7 days, whereafter it is pseudonymized and finally deleted after 180 days.
 - For any inquiries, deletion or rectification of your personal data you can contact LinkedIn here: <https://www.linkedin.com/help/linkedin/ask/PPQ?lang=eng> or set your setting here: https://www.linkedin.com/help/linkedin/answer/50191?trk=microsites-frontend_legal_privacy-policy&lang=da.

- Facebook retargeting pixel, and Facebook connect for social sharing
 - The purpose is to provide you with our ads on Facebook, if you have visited our website.
 - Facebook collects the cookieID and enriches this with their collected data.
 - Facebook is controller of the data: Facebook Ireland Ltd. 4 Grand Canal Square Grand Canal Harbour Dublin 2, Ireland.
 - The cookieID is stored for 90 days and the personal data enriched by Facebook is stored for as long as Facebook deems it necessary.
 - For any inquiries, deletion or rectification of your personal data please visit your settings here:
<https://www.facebook.com/login.php?next=https%3A%2F%2Fwww.facebook.com%2F>

[adpreferences%2Fad_settings%2F%3Fentry_product%3Daccount_settings_menu](#) or
contact Facebook here: <https://www.facebook.com/help/contact/2061665240770586>

Statistical cookies

Statistics cookies help us to improve our services by collecting and analysing information about the use of the services (e.g. which of our pages are visited most often). We use the following statistical cookies:

- Google Analytics cookie for tracking website behavior.
 - The purpose of the cookie is to track your usage of our website in order to enhance your experience on our website.
 - The cookie is stored for 730 days.
 - For further information on Google Analytics, including the purposes of use, please see below under “Use of Google Analytics”.

- Salesforce Pardot
 - The purpose of the cookie is to remember your preferences and maintain the session and remember table filters.
 - The controller is salesforce.com, Inc., The Landmark @ One Market Street, San Francisco, CA 94105, USA.
 - For further information on Salesforce Pardot, including the purposes of use, please see below under “Use of Salesforce Pardot”.

Necessary cookies

These cookies ensure that the services work properly. These enable core functions such as page navigation and access to secure areas. Without these cookies, the services cannot function properly; they can only be disabled by changing the browser settings. We use the following necessary cookies:

- The purpose of the cookies is described below:
 - SIG_cookies_accepted:
 - This is a cookie that is loaded on the first load of the website but contains a blank value. This will be where the user’s choice to accept or decline cookies is stored.
 - The cookie will be stored on your device for 360 days.

- SIG_cookies_marketing_consent:
 - Google Tag Manager uses this cookie to confirm the user's choice on marketing cookies upon accepting the website's marketing cookies.
 - The cookie will be stored on your device for 360 days.
- SIG_cookies_statistics_consent
 - Google Tag Manager uses this cookie to confirm the user's choice on statistical cookies upon accepting the website's statistical cookies.
 - The cookie will be stored on your device for 360 days.
- SIG_lang_selected:
 - Necessary cookies that dictate the current language that will be loaded based on your IP-address.

Salesforce Pardot

Our website uses Pardot Services, an analysis tool from salesforce.com, Inc., The Landmark @ One Market Street, San Francisco, CA 94105, USA. Pardot Services sets a maximum of two cookies. The cookies set are a "Visitor Cookie" and a "Pardot App Session Cookie". The "Visitor Cookie" and "Pardot App Session Cookie" each generate an identification number used to recognize the browser of the website visitor. The identification number is a generated numerical code that has no meaning outside of Pardot Services. The "Pardot App Session Cookie" is only set when a customer logs in to the Pardot App as a user.

We also use Pardot to register for our e-mail service. E-mails sent with the help of Pardot use tracking technologies. We use this information to determine what topics are of interest to you by tracking whether our emails are opened, and which links you click on. We will then use this information to improve the e-mails we send you and the services we provide.

Further information on Google Analytics

Our website uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics uses cookies.

Through the use of Google Analytics cookies, your IP address is recorded and usually transmitted to a Google server in the USA and stored there. However, as we use AnonymizeIP, your IP address will be shortened by Google in advance if data is collected from within the European Union or European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there.

We use the data collected by Google Analytics cookies to track how the user uses our website to understand their use of it, to recognize you and link the devices you use when you visit our website on your browser or mobile device or otherwise engage with us.

The IP address transmitted by your browser in connection with Google Analytics will not be merged with other data by Google.

For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's site "[How Google uses data when you use our partners' sites or apps](#)".

You can prevent Google Analytics cookies from being stored by changing the settings in your browser software accordingly (for more information, see our cookie explanation). Please note that in this case you may not be able to use the full functionality of our website.

You can also prevent Google Analytics from processing your data by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

For more information on terms of use and privacy at Google Analytics, please visit <http://www.google.com/analytics/terms/de.html> or <https://www.google.de/intl/de/policies/> and <http://www.google.com/intl/de/analytics/learn/privacy.html>.

Passing on personal data to third parties

- **SIG group companies.** To support our sales effort and the provision of our services, your personal data may be disclosed to SIG group companies.
- **Service providers and advisors.** We may use external service providers and advisors to process your personal data and, for this purpose, may pass on personal data to these external service providers. Such services may include marketing campaign services, providing mailing or email services, tax and accounting services, conducting rewards, surveys or contests, performing

customer service, performing data enhancement services, performing fraud prevention services, bug fixing support, performing web hosting services or providing analytic services, including analysis so that we can better understand your preferences and interests, personalize your experience and enhance the products and services. These external service providers were carefully selected by us and will be bound by appropriate data processing agreements to only process the data on SIG's behalf and under its instructions, unless such service providers and advisors act as their own controllers (e.g., in the case we seek advice from lawyers).

- **Purchasers and third parties in connection with a business transaction.** We may share personal data with third parties in connection with a SIG-related transaction, such as a merger, sale of SIG assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business, or in the event of a bankruptcy or similar proceedings.
- **Law enforcement, regulators and other parties for legal reasons.** We may share your personal data with third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our legal claims or to protect the security or integrity of our services; and/or (c) to exercise or protect the rights, property or personal safety of SIG employees, our visitors or others.
- **Otherwise with consent.** We may disclose an individual's personal data to certain other third parties with that individual's consent.

International Data Transfers

It is possible that personal data may be passed on to companies in countries outside the European Economic Area if, for example, one of our servers or service providers is located in a country outside the European Economic Area. These countries may not have data protection laws comparable to those of the European Economic Area. If we disclose your personal data outside the European Economic Area, we will take appropriate steps to ensure that your personal data remains protected in a manner consistent with the level of protection afforded by the European Economic Area, by, inter alia, concluding so-called Standard Contractual Clauses that have been adopted by the European Commission. You can request a copy of our Standard Contractual Clauses and further information on each international data transfer covering your personal data by using the contact details set out in the section "How to contact us".

Security

Our website is hosted on servers operated in the European Economic Area. We take reasonable precautions to protect your personal data from unauthorized access. These are adapted to the current state of the art in each case. The data is stored in a sealed, certified data centre on secure computers. The data

is stored and encrypted where appropriate. We regularly review our security policies and procedures to ensure the security of our systems. However, the transmission of data via the Internet does not guarantee 100% security of the data transmitted to our website. In the event that any personal data under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose personal data may have been compromised and take other steps in accordance with any applicable laws and regulations, such as notifying competent data protection authorities.

Storage duration

As a matter of principle, we will only store your personal data for as long as it is necessary for the purposes for which it was collected in accordance with this data protection declaration, unless we are legally obliged to store it for a longer period of time (e.g. for the fulfilment of storage periods under tax and commercial law).

If you signed up for our promotional emails, we will delete your respective personal data if you unsubscribe from receiving our promotional emails. However, we will store your email address in a blacklist to ensure that you will not receive any further communication.

Links to other websites and features

If you follow a link to a third-party website that is contained on our services, please note that these websites and features are governed by the privacy notices of these third parties and that we do not accept any responsibility or liability for their notices. We strongly recommend that you read their privacy notices and terms of use to understand how they collect, use, share and otherwise process personal data. We are not responsible for the privacy practices or the content on the websites of third-party sites.

Your rights

You have the following rights in respect to your personal data that we hold:

- **Right of access.** The right to obtain access to your personal data.
- **Right to rectification.** The right to obtain rectification of your personal data without undue delay where that personal data is inaccurate or incomplete.
- **Right to erasure.** The right to obtain the erasure of your personal data without undue delay in certain circumstances, such as where the personal data is no longer necessary in relation to the purposes for which it was collected or processed.

- **Right to restriction.** The right to obtain restriction of our processing of your personal data in certain circumstances, such as, where the accuracy of the personal data is contested by you, for a period of time enabling us to verify the accuracy of that personal data.
- **Right to portability.** The right to portability allows you to move, copy or transfer personal data easily from one organization to another.
- **RIGHT TO OBJECT.** YOU HAVE A RIGHT TO OBJECT TO ANY PROCESSING BASED ON OUR LEGITIMATE INTERESTS WHERE THERE ARE GROUNDS RELATING TO YOUR PARTICULAR SITUATION. YOU CAN OBJECT TO MARKETING ACTIVITIES FOR ANY REASON WHATSOEVER.

If you wish to exercise one of these rights, please contact us by using the contact details set out in the section “How to contact us”.

In addition to the foregoing listed rights, you also have the **right to lodge a complaint** with your local data protection authority. However, we encourage you to first reach out to us by using the contact set in the section “How to contact us” so that you have an opportunity to address your concerns directly and find a solution together before you do lodge a complaint.

To the extent, you have provided your consent, you may withdraw such consent at any time with effect for the future by contacting us using the contact details set out in the section “How to contact us”. With regard to your consent in relation to our use of cookies, please see under “How to withdraw consent for our use of Tracking Technology”.

Online privacy notice updates

We may make changes to our privacy notice from time to time and will indicate these by changing the “Last Updated” date at the beginning of this privacy notice. Please review our policies regularly, as updated policies will apply to your future use of our services.

How to contact us

If you have any questions or concerns about our privacy notice or want to exercise your rights, you can contact us at:

SIG International Services GmbH:

Rurstraße 58

52441 Linnich

Germany

or

<https://www.sig.biz/en/contact>

Our data protection officer can be contacted at: datenschutzbeauftragter@sig.biz