

INFORMATION ON DATA PROCESSING

Information pursuant to Art. 13 GDPR regarding the processing of the personal data of visitors of our website (www.cflex.com), customers, suppliers, interested parties and other business partners as well as newsletter recipients

The protection of your personal data is of utmost concern to Constantia Flexibles, and we take it into account in all of our business processes. When processing your personal data, we adhere to statutory requirements, in particular the European General Data Protection Regulation (EU) 2016/679 (GDPR), and all applicable legal bases.

Personal data means any information related to an identified or identifiable natural person. When we process your personal data you are considered a “data subject”.

We hereby would like to inform you in detail about the handling of your personal data, about your legal rights pursuant to Art. 13 et seq. GDPR, and how you can exercise those rights.

1 Scope

This information about data processing pursuant to Art. 13 and 14 GDPR applies to the collection and processing of personal data by Constantia Flexibles Group GmbH or its affiliated companies (“Constantia Flexibles”) in the context of your visit and use of our website (www.cflex.com) resp. various subsites such as ecolutions.cflex.com or interactive.cflex.com.

2 Controller pursuant to Art. 4 para. 2 GDPR

The responsible data processor is:

Constantia Flexibles Group GmbH
Rivergate, Handelskai 92
A - 1200 Vienna
Phone: +43 1 8888 5640 - 0
Email: dataprivacy@cflex.com

3 Legal basis for the processing of personal data

- (1) If we obtain your consent for processing operations regarding personal data, this is based on Art. 6 para. 1 (a) GDPR.
- (2) For the processing of personal data required to fulfill a contract to which you are a party, Art. 6 para. 1(b) GDPR serves as the legal basis. This also applies to processing operations required to carry out pre-contractual actions.

- (3) If the processing of personal data is required to fulfill a legal obligation of our company, it is based on Art. 6 para. 1 (c) GDPR.
- (4) If the processing is required to protect a legitimate interest of our company or of a third party, it is based on Art. 6 para. 1 (f) GDPR.

4 What data is processed, from where is it sourced and for what purpose is this data processed?

Below we inform you about the collection of personal data when using our website. Personal data is all data that can be linked to you personally, e.g. name, address, e-mail addresses, user behavior.

- (1) When you contact us by e-mail or through a contact form, we will store the information you have provided (your e-mail address and if applicable your name and your telephone number) in order to answer your questions.
- (2) In addition to the purely informational use of our website, we offer various services that you can use if you are interested. To do this, you will generally need to provide other personal information that we use to provide the service and for which the aforementioned data processing principles apply. Mandatory information is marked with an asterisk. Information in fields not marked in this way is purely voluntary.
- (3) If we rely on service providers for individual functions of our offer or if we would like to use your data for advertising purposes, we will inform you in detail below about the respective transactions.
- (4) Collection of personal data when visiting our website: in the case of the mere informational use of the website, i.e. if you do not register or otherwise provide us with information, we will only collect the personal data that your browser transmits to our server. If you wish to view our website, we collect the following data which is technically necessary for us to display our website and to ensure stability and security (legal basis for this is Art. 6 (1) sentence 1 lit. f GDPR):
 - IP address
 - Host name
 - Date and time of the request
 - Time zone difference to Greenwich Mean Time (GMT)
 - Content of the request (specific page)
 - Access status/HTTP status code
 - Transferred volume of data in each case
 - Website from which the request was received (referrer)

- The specific pages of our website viewed by you
- Browser: type, version and language setting
- Operating system: type and version
- If JavaScript is enabled, also:
 - Screen resolution
 - Color depth
 - Size of the browser window
 - Installed browser plug-ins
 - IP address

5 Other functions and offers of our website and the data processing associated with them?

5.1 Use of cookies

- (1) In addition to the aforementioned data, cookies are stored on your computer when you use our website. Cookies are small text files that are stored on your hard drive, assigned to the browser you are using, and that provide certain information to the body that placed the cookie. Cookies cannot run programs or transmit viruses to your computer. They serve to make the Internet offer more user-friendly and effective overall.
- (2) This website uses the following types of cookies, the scope and operation of which are explained below:
 - Transient cookies (see a)
 - Persistent cookies (see b)
 - Flash cookies (see e)
 - a) Transient cookies are automatically deleted when you close the browser. These include in particular the session cookies. These store a so-called session ID, with which various requests from your browser can be assigned to the common session. This will allow your computer to be recognized when you return to our website. The session cookies are deleted when you log out or close the browser.
 - b) Persistent cookies are automatically deleted after a specified period, which may differ depending on the cookie. You can delete the cookies in the security settings of your browser at any time.
 - c) You can configure your browser setting according to your wishes and e.g. decline the acceptance of third-party cookies or all cookies. So-called "Third-party Cookies" are cookies that have been placed by a third party, and therefore not by the actual website which you are

currently at. Please be aware that you thus may not be able to use all functions of this website.

- d) We use cookies to identify you for follow-up visits if you have an account with us. Otherwise you would have to log in again for each visit.
- e) The Flash cookies used are not detected by your browser but by your Flash plug-in. Furthermore, we use HTML5 storage objects, which are stored on your device. These objects store the required data regardless of your browser and do not have an automatic expiration date. You can configure the setting and deletion of Flash cookies via the Adobe Flash Player Settings Manager at http://www.macromedia.com/support/documentation/de/flashplayer/help/settings_manager_07.html. Alternatively, if you do not want Flash cookies to be processed, you can install an add-on, e.g., "Better Privacy" for Mozilla Firefox (<https://addons.mozilla.org/de/firefox/addon/betterprivacy/>) or the Adobe Flash killer cookie for Google Chrome. You can prevent the use of HTML5 storage objects by applying the private mode in your browser. In addition, we recommend that you regularly delete your cookies and the browser history manually.

5.2 Web Analytics

The legal basis for the use of all web analysis tools listed in this section is Art. 6 para. 1 sentence 1 lit. f GDPR, i.e., the preservation of our legitimate interests in consideration of the interests of our website visitors. We are interested in analyzing the use of our website by our website visitors in order to improve our offer and to make it more interesting for you as a user. Insofar as the analysis tool used also serves other purposes or we make use of it for other interests, we will inform you directly in the explanation of the respective analysis tool.

5.2.1 Google Analytics

- (1) This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files stored on your computer which allow an analysis of your use of the website. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. However, due to the activation of IP anonymization on this website, your IP address will be shortened beforehand by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the US and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity, and to provide the website operator with further services associated with website and Internet use.

- (2) The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.
- (3) You can prevent the storage of cookies by selecting the appropriate settings in your browser software; however, please note that if you do this, you may not be able to use all the functions of this website. You may also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.
- (4) This website uses Google Analytics with the extension "_anonymizeIp()". As a result, IP addresses are processed shortened, thereby excluding the possibility of personal identification. Insofar as the data collected about you is assigned a personal reference, it will be immediately excluded and the personal data will be deleted immediately.
- (5) For the exceptional cases in which personal data is transferred to the USA, Google has agreed to comply with the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.
- (6) Third Party Information: Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001
Terms of Use: <http://www.google.com/analytics/terms/de.html>
Data Protection: <http://www.google.com/intl/de/analytics/learn/privacy.html>
Privacy Policy: <http://www.google.de/intl/de/policies/privacy>.

5.3 Online Advertising

5.3.1 DoubleClick by Google

- (1) This website continues to use the online marketing tool DoubleClick by Google. DoubleClick uses cookies to present ads that are relevant to users, to improve campaign performance reports, or to prevent a user from seeing the same ads multiple times. Google uses a cookie ID to determine which ads are running in which browser and can prevent them from being displayed multiple times. In addition, DoubleClick uses cookie IDs to track conversions related to ad requests. For example, if a user sees a DoubleClick ad and later goes to the advertiser's website with the same browser and buys something there. According to Google, DoubleClick cookies do not contain personally identifiable information. By using this tool, we are interested in showing you advertisements of interest to you, increasing the attractiveness of our website to you and achieving a fair calculation of advertising costs. The legal basis for the processing of your data is Art. 6 para. 1 sentence 1 lit. f GDPR.
- (2) Due to the marketing tools used, your browser automatically establishes a direct connection to the Google server. We have no control over the extent and further use of the data collected

by the use of this tool by Google and therefore inform you to the best of our knowledge: By including DoubleClick, Google receives the information that you have accessed the corresponding part of our website or clicked on an ad from us. If you are registered with a service provided by Google, Google may associate the visit with your account. Even if you are not registered with Google or have not logged in, there is a chance that the provider will find and store your IP address.

- (3) You can prevent participation in this tracking process in several ways:
- a) By setting your browser software accordingly, in particular, the suppression of third-party cookies will prevent you from receiving any third-party ads,
 - b) by disabling the cookies for conversion tracking by setting your browser to block cookies from the domain "www.googleadservices.com", <https://www.google.de/settings/ads>, this setting being deleted when you delete your cookies,
 - c) by deactivating the interest-based advertisements of the providers that are part of the "About Ads" self-regulation campaign via the link <http://www.aboutads.info/choices>, this setting being deleted when you delete your cookies,
 - d) by permanent deactivation in your browsers Firefox, Internet Explorer or Google Chrome under the link <http://www.google.com/settings/ads/plugin>. We would like to point out that in this case you may not be able to use all the functions of this offer in full. Alternatively, visit the Network Advertising Initiative (NAI) web site at <http://www.networkadvertising.org>.
- (4) For more information about DoubleClick by Google, visit <https://www.google.de/doubleclick> and <http://support.google.com/adsense/answer/2839090>, as well as the general Google Privacy Policy: <https://www.google.de/intl/de/policies/privacy>. Google has agreed to comply with the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

5.3.2 Google Tag Manager

- (1) This website uses Google Tag Manager. Google Tag Manager is a solution that enables marketers to manage site tags through a single interface. Google Tool Manager only implements tags. The tag manager is a cookie-free domain. This means that no cookies are used and no personal data is collected. The tool triggers other tags, which may collect data on their part. Google Tag Manager does not access this data. If disabled at domain or cookie level, it will remain in effect for all tracking tags implemented with Google Tag Manager.
- Privacy Policy: <http://www.google.de/tagmanager/use-policy.html>
- Click here to opt out of Google Tag Manager tracking.

5.3.3 Use of Google Adwords Conversion / Remarketing

- (1) We use the offer of Google Adwords to draw attention to our attractive offers on external websites with the help of advertising materials (so-called Google Adwords). In relation to the data of the advertising campaigns, we can determine how successful the individual advertising measures are. We are interested in showing you advertisements of interest to you, to increase the attractiveness of our website to you and to achieve a fair calculation of advertising costs. The legal basis for the processing of your data is Art. 6 para. 1 sentence 1 lit. f GDPR.
- (2) These advertising materials are supplied by Google via so-called "ad servers". To do this, we use ad server cookies, which measure certain performance metrics such as ads or user clicks. If you access our website through a Google ad, Google Adwords will store a cookie on your PC. These cookies usually expire after 30 days and are not intended to identify you personally. As analysis values, this cookie will typically save the unique cookie ID, number of ad impressions per placement (frequency), last impression (relevant to post-view conversions), and opt-out information (mark that the user does not wish to be contacted anymore).
- (3) These cookies allow Google to recognize your Internet browser. If a user visits certain pages of an Adwords customer's website and the cookie stored on their computer has not yet expired, Google and the customer will be able to detect that the user clicked on the ad and was redirected to that page. Each Adwords customer is assigned a different cookie. Cookies cannot be tracked via the websites of Adwords customers. We ourselves do not collect and process any personal data in the aforementioned advertising measures. We receive only statistical evaluations provided by Google. On the basis of these evaluations, we can identify which of the advertising measures used are particularly effective. We do not receive any further data from the use of the advertising material, in particular we cannot identify the users on the basis of this information.
- (4) Due to the marketing tools used, your browser automatically establishes a direct connection to the Google server. We have no control over the extent and further use of the data collected by the use of this tool by Google and therefore inform you to the best of our knowledge: By including AdWords conversion, Google receives the information that you have accessed the corresponding part of our website or clicked on an ad from us. If you are registered with a service provided by Google, Google may associate the visit with your account. Even if you are not registered with Google or have not logged in, there is a chance that the provider will find and store your IP address.
- (5) You can prevent participation in this tracking process in several ways:
 - a) By setting your browser software accordingly, in particular, the suppression of third-party cookies will prevent you from receiving any third-party ads,

- b) by disabling the cookies for conversion tracking by setting your browser to block cookies from the domain "www.googleadservices.com", <https://www.google.de/settings/ads>, this setting being deleted when you delete your cookies,
 - c) by deactivating the interest-based advertisements of the providers that are part of the "About Ads" self-regulation campaign via the link <http://www.aboutads.info/choices>, this setting being deleted when you delete your cookies,
 - d) by permanent deactivation in your browsers Firefox, Internet Explorer or Google Chrome under the link <http://www.google.com/settings/ads/plugin>. We would like to point out that in this case you may not be able to use all the functions of this offer in full.
- (6) For more information on Google's data protection regulations, see <http://www.google.com/intl/de/policies/privacy> and <https://services.google.com/sitestats/de.html>. Alternatively, visit the Network Advertising Initiative (NAI) web site at <http://www.networkadvertising.org>. Google has agreed to comply with the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

5.4 Social Media and other services of third parties

5.4.1 Google Maps

- (1) On this website we use the offer of Google Maps. In doing so, we are pursuing our interest in increasing the attractiveness of our website by showing you interactive maps directly on our website and allowing you to make comfortable use of the map function. The legal basis for the use of the plug-in is Art. 6 para. 1 sentence 1 lit. f GDPR.
- (2) By visiting the website, Google receives the information that you have accessed the corresponding subpage of our website. In addition, the data mentioned under section 4 of this policy will be transmitted. This is done regardless of whether Google provides a user account, via which you are logged in, or whether there is no such user account. When you are logged in to Google, your data will be assigned directly to your account. If you do not wish to be associated with your profile on Google, you must log out before activating the button. Google stores your data as usage profiles and uses them for purposes of advertising, market research and/or tailor-made website design. Such an evaluation is done in particular (even for users who are not logged in) to provide appropriate advertising and to inform other users of the social network about their activities on our website. You have a right to object to the formation of these user profiles, whereby you must direct your objection to Google in order to exercise this right.
- (3) Further information on the purpose and scope of the data collection and its processing by the plug-in provider can be found in the provider's privacy policy. There you will also find additional information on your rights and options for privacy settings: Google Inc., 1600

Amphitheatre Parkway, Mountainview, California 94043, USA;
<http://www.google.de/intl/de/policies/privacy>. Google also processes your personal data in the USA and has agreed to comply with the EU-US Privacy Shield,
<https://www.privacyshield.gov/EU-US-Framework>.

5.4.2 YouTube videos

- (1) We have integrated YouTube videos into our online offering, which are stored on <http://www.YouTube.com> and can be played directly from our website. These are all integrated in the “extended data protection mode”, which means that no data relating to you is transferred to YouTube unless you play the videos. Only if you play the videos will the data mentioned in subsection 2 be transmitted. We have no influence over transmission of these data. With the inclusion of YouTube videos, we are pursuing our interest in making our website more interesting and attractive to our visitors and to achieve a better presentation of content or facts. The legal basis for the use of the plug-in is Art. 6 para. 1 sentence 1 lit. f GDPR.
- (2) By visiting the website, YouTube receives the information that you have accessed the corresponding subpage of our website. In addition, the data mentioned under section 4 of this policy will be transmitted. This occurs regardless of whether YouTube provides a user account, via which you are logged in, or whether there is no such user account. When you are logged in to Google, your data will be assigned directly to your account. If you do not wish to be associated with your profile on YouTube, you must log out before activating the button. YouTube stores your data as user profiles and uses them for purposes of advertising, market research and/or the custom design of its website. Such an evaluation is done in particular (even for users who are not logged in) to provide appropriate advertising and to inform other users of the social network about their activities on our website. You have a right to object to the creation of these user profiles, whereby you must direct your objection to YouTube in order to exercise this right.
- (3) Further information on the purpose and extent of the data collection and its processing by YouTube can be found in the Privacy Policy. There you can also find additional information on your rights and options for privacy settings: YouTube LLC, 901 Cherry Ave, San Bruno, CA 94066, USA, represented by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; <https://www.google.de/intl/de/policies/privacy>. Google also processes your personal data in the USA and has agreed to comply with the EU-US-Privacy Shield,
<https://www.privacyshield.gov/EU-US-Framework>

5.4.3 Integration of other services of third parties

- (1) We also use offers from Google Fonts (fonts) on this website. By using these offers we can provide you with a better user experience on our website. This serves our interest of increasing the attractiveness of our website. The legal basis for the use of these offers is Art. 6 para. 1 sentence 1 lit. f GDPR.
- (2) When you visit the website, the respective third party provider receives the information that you have accessed the corresponding subpage of our website. In addition, the data mentioned under section 4 of this policy will be transmitted. This happens regardless of whether this third party provider provides a user account, via which you are logged in, or whether there is no such user account. If you are logged in to the third party provider, your data will be assigned directly to your account. If you do not wish to be associated with your profile from the respective third party provider, you must log out before activating the button. The third party may store your data as a user profile and may use it for purposes of advertising, market research and/or customized design of its website. Such an evaluation is done in particular (even for users who are not logged in) to provide appropriate advertising and to inform other users of the social network about their activities on our website. You have the right to object to the formation of these user profiles, whereby you must direct your objection to the relevant third-party provider in order to exercise this right.
- (3) Further information on the purpose and scope of the data collection and its processing by the plug-in provider can be found in the following listed privacy policies of these providers. There you will also find additional information on your rights and options for privacy settings:
- (4) Addresses of the respective provider and URL with their privacy policies:

Google Inc., 1600 Amphitheatre Parkway, Mountainview, California 94043, USA; <https://www.google.com/policies/privacy/partners/?hl=de>. Google has agreed to comply with the EU-US-Privacy-Shield. <https://www.privacyshield.gov/EU-US-Framework>

6 Who will receive my personal data und will data be transferred to third countries or an international organization?

The personal data you transfer to us will be handled confidentially.

Data will only be transferred to third parties if this is necessary for the performance of the functionalities of the website as described above or legally required or if you have given your consent, and as far as these third parties are bound by the GDPR or if they have committed to a corresponding level of protection. In this context, reference is made to the explanations on data transmissions described above in connection with individual functionalities of the website.

In addition, processors (contractors) may be tasked with the processing of personal data. These processors are contractually bound to observe the provisions of data protection law and security standards, although we remain responsible for the protection of your personal data.

Moreover, data may be transferred to subsidiaries or processors of the Company in third countries (countries outside the EU or the European Economic Area—EEA) or subcontractors of processors of the company in third countries. Processors outside the European Union are only contracted by us if an adequacy decision has been made for this third country by the European Commission or if we have agreed adequate and appropriate guarantees with the processor.

7 Storage period and erasure of data

The personal data will be erased as soon as the purpose of their storage ceases to exist, unless there is a need to continue to store them due to legal record-keeping obligations or to enforce legal claims.

8 Other

Your data will not be used for automated decision-making purposes (including profiling).

9 Data security

We use technical and organizational security measures to protect your data against manipulation, loss, destruction, and against access by third parties. Our security measures are continuously adapted to technological developments.

10 Your rights as a data subject

In the following, we will now inform you of your rights as a data subject pursuant to Art. 15 et seq. GDPR. You can exercise these rights at any time and contact us directly for this purpose. As soon as you address such a request to us, we will examine it under consideration of the associated legal requirements and obligations. To this end, we may request additional information from you. To ensure an efficient response to such requests, we kindly ask you to contact us using the contact details below and to include information on your relation to our company (and to specify to which Constantia Flexibles company you have the relation to).

- (1) Right to access: you have the right to request from us at any time confirmation as to whether or not personal data concerning you are being processed. This also includes information on the purposes of processing, any recipients to whom we may have disclosed your personal

data, the planned storage period, and, if applicable, information on the origin of the data, if we did not receive them directly from you.

- (2) Right to rectification: you have the right to request the rectification of inaccurate data that we have stored concerning you. This includes the right to complete incomplete personal data.
- (3) Right to erasure: you have the right to request that we delete data that we have stored concerning you.
- (4) Right to restriction of processing: under the requirements of Art. 18 GDPR, you have the right to request restriction of processing of data that we have stored concerning you. Thereafter, processing of this data is only possible with your consent or for a limited number of legally stipulated purposes.
- (5) Right to object: you have the right pursuant to Art. 21 GDPR to object at any time to the processing of data concerning you on grounds relating to your particular situation.
- (6) Right to withdraw consent to the processing of your personal data: if you have consented to the processing of your data, you can withdraw this consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- (7) Right to Data Portability: You have the right to obtain your personal data from us in a structured, common and machine-readable format for the purpose of transfer to another party responsible.
- (8) Right to lodge a complaint: should you consider that our processing of personal data relating to you has infringed data protection regulations, you may lodge a complaint with us. However, you also have the right to lodge a complaint at any time with the responsible supervisory authority regarding our processing of your personal data.

The supervisory authority in Austria is the Austrian Data Protection Authority (*Datenschutzbehörde*, DSB), Barichgasse 40-42, 1030 Vienna, www.dsb.gv.at, e-mail: dsb@dsb.gv.at.

You can find the list of the supervisory authorities of the respective EU member states at: https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

If you have any questions regarding data protection or wish to assert your rights, please directly contact the Constantia Flexibles company that is processing your data. You can find the contact persons for data protection issues within the individual Constantia Flexibles companies here:

[LINK list](#)

You might also contact the group's data protection coordinator:

Constantia Flexibles Group GmbH

1200 Vienna, Austria

Rivergate, Handelskai 92

E-mail: dataprivacy@cflex.com

This Privacy Policy was last updated on July 1, 2019.