

INFORMATION ON DATA PROCESSING

Information pursuant to Art. 13 and 14 GDPR regarding the processing of the personal data of customers, suppliers, interested parties and other business partners as well as newsletter recipients

As part of our business relation with you, it is inevitable that we process your personal data. 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 Holding GmbH or its affiliated companies (“Constantia Flexibles”) in the context of our business relationship with you as a customer, supplier, other business partner as well as recipient of our newsletter. The collection and processing of personal data by Constantia Flexibles through our website (www.cflex.com) is governed by a separate privacy policy which you can download on our website. The following information therefore applies especially for personal data transmitted to Constantia Flexibles by e-mail, but also by phone, by fax or by mail or which were provided by you personally.

2 Controller pursuant to Art. 4 para. 2 GDPR

The respective Constantia Flexibles company with which you have a business relation, or to whom you have handed your data, is responsible for the processing of your personal data.

You can find the list and contact details of the Constantia Flexibles companies here:

http://cflex.com/fileadmin/user_upload/documents/

[Data_Protection_Contact_Details_Legal_Entities_Europe_20190701.pdf](#)

3 Contact details of the data protection officer

For any questions regarding data protection, you can directly contact the respective Constantia Flexibles company with which you have business relations or contact. You can find the contact persons for data protection issues within the individual Constantia Flexibles companies here:

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Furthermore, within some companies, a data protection officer is available to answer your questions. Please, find the respective contact persons and their contact details in the list shown here:

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4 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.

5 Nature and purpose of the processing of personal data

- (1) Depending on the type and scope of your business relationship with us, personal data collected and processed may include, but are not limited to:
 - Information on your person such as your personal and contact details (e.g. name, place and date of birth, nationality, gender, title, address, e-mail addresses, telephone number),
 - Contract master and settlement data (contractual relationship, product and/or contractual interest),
 - Payment data (e.g. payment transactions data, turnover data, bank and account information),
 - Credit worthiness / status data (also from third parties, e.g. credit rating agencies or from public directories),

- Data on marketing and sales,
- Photo or video recordings (e.g. photos/videos at events, video surveillance),
- Identification data (ID documents) and
- Other personal data that are necessary for the initiation, processing, administration and maintenance of business relations.

(2) The data listed above are processed for the following purposes:

- Initiating, executing, administering and maintaining the business relation between us and our business partners (customers, suppliers, consultants, interested parties etc.);
- Communicating about products, services and projects and their execution (e.g. to create and process quotes and offers, to conclude, execute and settle contracts);
- Inviting to and implementing surveys, marketing campaigns, market analyses, games of chance or similar actions or events;
- Sending and providing a newsletter and advertising to inform about our existing and new products and innovations;
- Upholding and protecting the security of our products and services, preventing and discovering security risks, fraudulent behavior or other criminal actions or actions done with intent to cause harm;
- Observing legal requirements (e.g. tax law obligations);
- Resolving legal disputes, enforcing existing contracts and claiming, exercising and defending legal claims.

5.1 Newsletter

We send newsletters to customers and interested parties to inform them about our products and innovations and to provide targeted information. For this purpose, we store the contact details of people who want to receive the newsletter.

On our website you can subscribe, with your consent, to our newsletter, with which we inform you about our current interesting offers.

For the new registration to our newsletter we use the so-called double-opt-in-procedure. This means that after you have registered, we will send you an e-mail to the e-mail address specified in which we ask you to confirm that you wish to receive the newsletter. If you do not confirm your

registration within 24 hours, your information will be blocked and automatically deleted after one month. In addition, we store your IP addresses and times of registration and confirmation. The purpose of the procedure is to prove your registration and, if necessary, to inform you about possible misuse of your personal data.

The only requirement for sending the newsletter is your e-mail address and your name. The specification of additional, separately marked data is voluntary and will be used to address you more personally. After your confirmation, we will save your specified data for the purpose of sending the newsletter. The legal basis is Art. 6 para. 1 sentence 1 lit. a GDPR. The transmission of electronic information and communications about own products or services to existing customers also takes place on the legal basis of Art. 6 para. 1 lit. f DSGVO.

You can revoke your consent to the sending of the newsletter at any time and unsubscribe from the newsletter. The easiest way to express your withdrawal is to click on the link provided in each newsletter e-mail. After logging out, we delete the data.

The newsletter can be sent by a delivery services company (based within and outside the EU). For this purpose, your e-mail address and your name will be forwarded to the company, which stores and processes them for the sending the newsletter. Your first and last name are used only for the personalization of the newsletter. There is additional transmission or disclosure of the data without your consent.

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. Your personal data will neither be sold to third parties by us nor otherwise marketed.

Usually the personal data that you make available to us are only processed by the respective Constantia Flexibles company. It may however be necessary, in order to fulfill our obligations and as a result of our continuous business transactions, to transfer your personal data to associated companies, courts, public authorities, law firms and other business partners.

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, although we remain responsible for the protection of your personal data.

Furthermore, we only transfer your data to third parties that are bound by the GDPR or that are or have committed to a corresponding protection level. 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:

http://cflex.com/fileadmin/user_upload/documents/Data_Protection_Contact_Details_Legal_Entities_Europe_20190701.pdf

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

Constantia Flexibles Group GmbH

Rivergate, Handelskai 92

1200 Vienna, Austria

E-mail: dataprivacy@cflex.com

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