

INFORMATION ON DATA PROCESSING

Information pursuant to Art. 13 and 14 GDPR regarding the processing of the personal data of employees, former employees, job applicants, contractors, suppliers, customers, and other interested parties in regards with Constantia Flexibles Integrity Line (whistleblowing system).

Constantia Flexibles implements a whistleblower system for Constantia Flexibles' employees, former employees, job applicants, suppliers, vendors, customers, and other interested parties, which is a web-based reporting system on infringements of Constantia Flexibles' legal obligations, Constantia Flexibles' Code of Conduct, or legal obligations of our business partners (e.g., suppliers, vendors or customers).

This whistleblowing platform serves for receiving, processing and managing alerts concerning a (presumed) legal or internal regulatory violations in a safe and confidential way. The protection of your personal data is of utmost concern to Constantia Flexibles. 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 laws.

Personal data means any information related to an identified or identifiable natural person. When we process your personal data, you are considered as "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 reporting a (presumed) legal or internal regulatory violation through the whistleblowing system by you (as an employee, former employee, job applicant, supplier, vendor, customer, or other interested party) or in connection with you.

2 Controller pursuant to Art. 4 para. 2 GDPR

The respective Constantia Flexibles company, with which a whistleblowing alert has been filed, is responsible for the processing of your personal data.

You can find the list and contact details of the Constantia Flexibles companies [here](#).

3 Contact details of the data protection personnel

For any questions regarding data protection, please send your request to integrity@cflex.com.

You can also contact the respective Constantia Flexibles company with which you have filled your whistleblowing alert or with which the whistleblowing alert has been filed. You can find the contact persons, as well as the data protection officers (if available) within the individual Constantia Flexibles companies [here](#).

4 Legal basis for the processing of personal data

- (1) 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.
- (2) If the processing is required to protect a legitimate interest of our company, it is based on Art. 6 para. 1 (f) GDPR.

5 Source, nature and purpose of the processing of personal data

We process your personal data provided or uploaded by you or a third party in the context of a whistleblowing alert through our whistleblowing platform or in the context of Constantia Flexibles processing such an alert.

- (1) Depending on the information provided in the whistleblowing alert, 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, nationality, gender, title, address, e-mail addresses, telephone number),
 - Employment or business relationship information (e.g., company you work for, role/function),
 - Photo(s), video recording(s), other file(s), or others personal data uploaded via the whistleblowing system, and
 - Other personal data that are necessary for the processing, administration and investigation of the whistleblowing alert.

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

- Evaluation of received whistleblowing alerts received through the whistleblowing system (a) in accordance with national legal requirements and (b) potential reporting to the relevant internal stakeholders and/or external authorities (administrative and law enforcement authorities) in accordance with the legal requirements (e.g., anti-corruption, competition, and criminal laws);
- Upholding and protecting our products and services, preventing and discovering security risks, fraudulent and unethical behavior or other criminal actions or actions done with intent to cause harm;
- Compliance with legal requirements (e.g., whistleblowing legal requirements).

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

The personal data you transfer or have been transferred to us in connection with the whistleblowing alert 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 or that have been filed with us, are only processed by the respective Constantia Flexibles company or by the responsible group functions like Compliance, Audit, HR or Management. It may however be necessary, in order to fulfill our obligations and as a result of proper handling of the whistleblowing alert, to transfer your personal data to associated companies, courts, public authorities, attorneys and external advisors. IT infrastructure, maintenance, as well as technical support of the platform are provided by an IT service provider (Denmark).

In addition, if we transfer your data to third parties, we only choose processors in countries 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 on 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. The duration of storage period depends in particular on the legal record-keeping requirements set by each

jurisdiction, in which Constantia Flexibles (meaning the company with which the whistleblowing alert has been filed or is handled) is present.

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 Group 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 your 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://edpb.europa.eu/about-edpb/about-edpb/members_en.

We would like to point out to you that your rights of information must not adversely affect the rights and freedoms of other persons or jeopardize the purpose of the intended processing. Likewise, the data subject's right to information does not exist if disclosure of that information puts a business or trade secret of the controller and/or third parties at risk. This is why we do not issue any information, e.g., about a third party's information that is subject to data protection.

If you have any questions regarding data protection or wish to assert your rights, please send your request to integrity@cflex.com. You can also contact the Constantia Flexibles company that is processing your data. You can find the contact details for data protection issues within the individual Constantia Flexibles Group companies [here](#).

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 October 31, 2023.