

INFORMATION ON DATA PROCESSING

IMPORTANT NOTE: This information is only valid for reports filed via the Constantia Flexibles Integrity Line (whistleblowing system) with a company of Constantia Flexibles located outside the European Union / European Economic Area and the United Kingdom.

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 accordance with the data protection regulations 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 data processing activities conducted by us in regards with a report filed through the whistleblowing system and your rights and entitlements under the data protection laws.

1 Scope

This information about data processing under the data protection laws 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 Responsible entity for data processing

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

You will find relevant contact details at the end of this document under the point 8.

3 Legal basis for the processing of personal data

We process your personal data in accordance with the data protection regulations, in particular processing of personal data is required to fulfill a legal obligation of our company and also is required to protect a legitimate interest of our company or of a third party.

4 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 your 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).

5 Who will receive my personal data?

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 in third countries. IT infrastructure, maintenance, as well as technical support of the platform are provided by an IT service provider (Denmark).

6 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.

7 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.

8 Your rights as a data subject

Please address any enquiries or requests in accordance with the applicable data protection laws directly to the email address: integrity@cflex.com or to the responsible Constantia Flexibles company, with which the whistleblowing alert has been filed.

Once you make such a request to us, we will consider it in light of the related legal requirements and obligations. For this purpose, we may request additional information from you.

In order to ensure an efficient response to such requests, we ask you to contact us using the contact details provided above and to provide information about your relationship with our company (and to indicate with which Constantia Flexibles Group company you have the relationship).

This Privacy Policy was last updated on October 31, 2023.