

GREEN BAY PACKAGING PRIVACY POLICY

Data Privacy is Important to Us

Please be assured that your privacy is of utmost importance to us. We comply with all applicable data privacy laws, including as and to the extent applicable, (i) the European Union General Data Protection Regulation regarding personal data collected and processed concerning residents of the European Union and European Economic Area; and (ii) the California Consumer Privacy Act (CCPA) regarding employees and independent contractors of the Company who are also residents of California.

What Information We Collect and Process

We collect and process business contact information and financial information from our business customers and vendors.

How and Why We Process Personal Information

We process personal information for the following purposes:

- Providing products and services to our business customers. We collect and process the business contact information of the individuals working for our business customers so that we can enter into and perform contracts with our business customers to provide our products and services.
- Working with our vendors. We collect and process the business contact information of the individuals working for our vendors so that we can enter into and perform contracts with our vendors.

How We Protect Your Information

We take the security of personal data seriously. The Company has internal policies and technical measures in place to protect personal data against loss, accidental destruction, misuse or disclosure. Such internal policies and technical measures include:

- The use of pseudonymization and encryption of personal data where appropriate;
- Procedures and controls to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- Procedures and controls to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;

- Procedures for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing; and
- Procedures to ensure that data is not accessed, except by employees in the proper performance of their duties.

How Long Do We Retain Personal Information

We retain personal information only for the period of time necessary to meet the purposes for which it was collected, to fulfil the legitimate business interests of the Company, and to comply with any data retention laws or legal requirements. Generally, we retain personal information for the duration of our customer relationships.

To Whom Do We Disclose Personal Information

We disclose personal information to company personnel in our various locations who have a need to know the information to provide our products and services to you. We also disclose personal information to suppliers who have a need to know the information to assist us to provide our products and services to you.

Interaction with Children

We do not collect personal data of and our websites do not target or provide content to children under the age of 16.

Cookies

Cookies are small files that web servers place on a user's hard drive. We use functional cookies to permit you to use our website. We do not use "persistent cookies" or any other persistent tracking methods to collect personal information about visitors to its websites.

Privacy Rights of California Residents

Pursuant to Californian Civil Code Section 1798.83, California residents have the right to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to us at: legal@gbp.com.

Employees and independent contractors of the Company who are also residents of California should refer to Appendix A below for additional information and the Company's privacy policy related to the CCPA.

Data Subject Rights of EU Residents

EU residents have the following rights regarding their personal data:

- Right of Access: You have the right to obtain confirmation from the Company as to whether or not personal data concerning you is being processed and how, what when, why and for how long your personal data is processed and to whom it is disclosed.
- Right to Rectification: You have the right to request the Company to correct inaccurate personal data and to complete incomplete personal data.
- Right to Erasure (Right to be Forgotten): You have the right to request the Company to erase personal data concerning you where your personal data is no longer needed for the purposes for which it was collected or processed or has otherwise been improperly processed.
- Right to Object: You have the right to object to the processing of your personal data if the processing is based upon the Company's legitimate interest or for the performance of a task carried out in the public interest, including any profiling based on such processing, or if the processing is for direct marketing.
- Right to Restrict Processing: You have the right to request the Company to restrict the processing of your personal data while your data subject rights requests are being investigated and answered.
- Right to Portability: You have the right to receive personal data that you have provided to the Company and transmit such personal data to another entity where the processing of such personal data is based on consent and is processed by automated means. Additionally, you have the right to require the Company to transmit such personal data directly to another entity, where technically feasible.
- Right not to be Subject to Automated Decision-Making, Including Profiling: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you.

EU residents also have the right to lodge a complaint with the local or national data protection authority in the jurisdiction where they reside. A listing of the EU Data Protection Authorities ("DPAs") is located at: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm. To make a subject access request, you should send the request to us at: legal@gbp.com.

Changes to Our Privacy Policy; Questions and Concerns

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we handle personal information, we will provide notice of the changes on the website home page. Any questions or concerns regarding how we collect and process personal information should be directed to: legal@gbp.com.

Appendix A

GREEN BAY PACKAGING INC. PRIVACY POLICY (CCPA)

(Version 1.1 Eff. 7/24/2020 | Originally Adopted 1/1/2020)

1. PURPOSE AND INTENT

Green Bay Packaging Inc. and its subsidiaries and affiliates (collectively, “Green Bay Packaging” “we” or “us”) establish this Privacy Policy because we process the personal information of employees and independent contractors who are residents of California (“CA”). We are committed to protecting the privacy and security of your personal information. This privacy policy describes how we collect and use personal information about you during and after your working relationship with us. It applies to all employees and independent contractors of any part of Green Bay Packaging who are also CA residents. We are responsible for deciding how we hold and use personal information about you. We are required under the California Consumer Privacy Act (“CCPA”), as amended, effective January 1, 2020, to provide you with notice at the time of collection.

This policy applies to applicants, current and former employees and contractors and does not form part of any contract of employment or other contract to provide services. We may update this policy at any time.

It is important that you understand this policy, together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. If you have any questions about this privacy policy or how we handle your personal information, please contact us by email to legal@gbp.com or by mail to Green Bay Packaging Inc., 1700 N. Webster Court, Green Bay, WI 54302, Attention: Legal Department.

2. DATA PROTECTION PRINCIPLES

We will comply with applicable data protection law. This says that the personal information we hold about you must be: (i) used lawfully, fairly and in a transparent way; (ii) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes; (iii) relevant to the purposes we have told you about and limited only to those purposes; (iv) accurate and kept up to date; (v) kept only as long as necessary for the purposes we have told you about; and (vi) kept securely.

3. WHAT PERSONAL INFORMATION IS COLLECTED AND HOW IT IS USED

For job applicants, please refer to Green Bay Packaging’s PRIVACY NOTICE TO CALIFORNIA JOB APPLICANTS REGARDING THE COLLECTION OF PERSONAL INFORMATION for what information we collect about job applicants and how we use and disclose it.

For employees and former employees, please refer to Green Bay Packaging's PRIVACY NOTICE TO CALIFORNIA EMPLOYEES REGARDING THE COLLECTION OF PERSONAL INFORMATION for what information we collect about employees and former employees and how we use and disclose it.

For independent contractors, please refer to Green Bay Packaging's PRIVACY NOTICE TO CALIFORNIA INDEPENDENT CONTRACTORS REGARDING THE COLLECTION OF PERSONAL INFORMATION for what information we collect about independent contractors and how we use and disclose it.

Additional copies of these referenced notices can be requested via email to legal@gbp.com, by mail to Green Bay Packaging Inc., 1700 N. Webster Court, Green Bay, WI 54302, Attention: Legal Department, or obtained from the Company's Human Resources Sharepoint site.

4. FAILURE TO PROVIDE PERSONAL INFORMATION

If you fail to provide certain information when requested, we may not be able to address our employment or contract obligations (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

5. CHANGE OF PURPOSE

We will only use your personal information for the purposes we have disclosed in our notice(s). If we need to use your personal information for an unrelated purpose, we will notify you. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DATA SECURITY

While no data security system can fully protect personal information from unauthorized data breaches, Green Bay Packaging has implemented reasonable safeguards and controls, consistent with its legal obligations under CA and other local, state and federal laws. Green Bay Packaging is committed to: (i) seeking to safeguard all personal information that you provide to us; (ii) seeking to ensure that it remains confidential and secure; and (iii) taking all reasonable steps to ensure that personal privacy is respected. All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorized access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, Green Bay Packaging and third parties who need to know that information for the purposes identified in our notice(s).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

7. DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you are no longer an employee or contractor of Green Bay Packaging, we will retain and securely destroy your personal information in accordance with Green Bay Packaging's record retention policies.

8. CHANGES TO THIS PRIVACY POLICY

As we strive to improve our practices, we may revise Green Bay Packaging's Privacy Policy from time to time. This Privacy Policy is not a contract and we reserve the right to change this policy at any time and to notify you of those changes by posting an updated version of this policy. It is your responsibility to check this policy from time to time for any changes.