

## STATEMENT ON ELOPAK'S WORK WITH PRIVACY AND DATA PROTECTION

Elopak takes data protection seriously, and the group is dedicated to ensuring compliance with applicable data protection legislation, including the Norwegian Data Protection Act and EU's General Data Protection Regulation (GDPR).

### Processing of personal data on customer representatives

Elopak processes personal data on its customer representatives as part of its customer relationship management. The processing includes storing and use of the representative's name and contact information. Furthermore, visits to some of Elopak's premises will require the registration of the visitor's name and contact information. Certain areas of some premises are also subject to camera surveillance. The purpose of the processing of personal data related to these activities are to prevent unauthorized access to the premises, as well as to prevent, detect and handle breaches of security.

Any natural person (data subject) that have his/her personal data processed by Elopak, has a right to receive information about the processing and a right to get access to the personal data concerning him/her. The data subject can also demand rectification of inaccurate or incomplete personal data, erasure of personal data and restriction of processing of personal data. Furthermore, the data subject has a right to object to the processing of his/her personal data if the processing is based on point (e) or (f) of GDPR article 6(1), and a right to data portability if the processing is based on point (a) or (b) of GDPR article 6(1). Elopak has developed procedures describing how the data subject's rights shall be ensured.

### Privacy and data protection management system

Elopak has a risk-based approach to the work within the area, and the group has developed a management system for privacy and data protection. The management system includes:

- Governance documents, procedures and guidelines to ensure that required assessments and activities are conducted.
- Documented role descriptions and reporting lines.
- Records of processing activities in accordance with the requirements in GDPR article 30.
- Risk assessments and data protection impact assessments.
- Privacy statements providing data subjects with information on their rights and how their personal data is being processed.
- A template for data processing agreements in accordance with the requirements in GDPR article 28.
- Mechanisms to ensure compliance and improvement, including procedures for handling of incidents and data breaches, and control measures.

Elopak has also adopted both organizational and technical measures to ensure an appropriate level of security around the processing of personal data. The measures include the use of access management, access controls, logging, security awareness campaigns and guidelines for acceptable use of IT-tools.

All employees receive training customized to their responsibilities and role. Elopak has appointed dedicated resources with specific responsibility for ensuring compliance with the applicable data protection legislation. The group has also appointed a data protection officer that provides advice to Elopak and functions as a contact point for data subjects and the supervisory authority.

### Binding corporate rules

The group has applied for the supervisory authority's approval of binding corporate rules (BCR), that will function as a basis for intra group transfers of personal data from Elopak companies in EU/EEA to Elopak companies outside EU/EEA. The BCR shall provide appropriate safeguards and an adequate level of protection for the transfers and processing of personal data within the group and provide enforceable data subject rights and effective legal remedies for data subjects affected by the Processing of personal data within the group.