

## Privacy Notice and Policy for California Residents

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This Privacy Notice and Policy for California Residents supplements the information contained in the Graphic Packaging Holding Company (“GPHC”) [Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

### Categories of Personal Information Collected and Disclosed

While our processing of personal information varies based upon our relationship and interactions with you, the table below identifies, generally, the categories of personal information (as defined by the CCPA) that we have collected about California residents, as well as the categories of third parties to whom we may disclose this information for a business or commercial purpose.

<b>Categories of Personal Information</b>	<b>Description</b>	<b>Categories of Third-Party Disclosures</b>
Identifiers	This information may include your real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Advisors and agents</li> <li>• Service providers</li> <li>• Regulators, government entities and law enforcement</li> <li>• Others as required by law</li> <li>• Internet Service Providers, operating systems and platforms</li> </ul>
Customer records	This information may include your name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, or education.	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Regulators, government entities and law enforcement</li> <li>• Others as required by law</li> <li>• Internet service providers, operating systems and platforms</li> </ul>
Protected Classifications	This information may include age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Regulators, government entities and law enforcement</li> <li>• Others as required by law</li> <li>• Internet service providers, operating systems, and platforms</li> </ul>

	childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	
Internet or other similar network activity	This information may include your browsing history, search history, information on your interaction with a website or advertisement.	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Regulators, government entities and law enforcement</li> <li>• Others as required by law</li> <li>• Internet Service Providers, operating systems and platforms</li> </ul>
Location information	Location information about a particular individual or device.	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Regulators, government entities and law enforcement</li> <li>• Others as required by law</li> <li>• Internet Service Providers, operating systems and platforms</li> </ul>

### **Sales and Sharing of Personal Information**

California privacy laws define a "sale" as disclosing or making available to a third-party personal information in exchange for monetary or other valuable consideration, and "sharing" broadly includes disclosing or making available personal information to a third party for purposes of cross-context behavioral advertising. While we do not disclose personal information to third parties in exchange for monetary compensation, we may "sell" or "share" (as defined by the CCPA) internet and electronic network activity information to/with third-party data analytic, marketing, and advertising partners. We do so in order to improve and evaluate our advertising campaigns and better reach customers and prospective customers with more relevant ads and content. GPHC does not sell or share personal information, including sensitive personal information, or the personal information of individuals under sixteen (16) years old. For more on how we share personal information, refer to GPHC's [Privacy Policy](#).

### **Sources of Personal Information**

In general, we obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete on our website.
- Indirectly from you. For example, from observing your actions on our website, business customers, and government entities.

## **Purposes of Collection, Use, and Disclosure of Personal Information**

We may collect, use, or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise permitted under the CCPA.
- For our general business and operational support. For example, to consider and implement mergers, acquisitions, reorganizations, bankruptcies, and other business transactions such as financings, and related to the administration of our general business, accounting, auditing, compliance, recordkeeping, and legal functions. Where we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for and purposes except performing the contract.
- For security and protection of rights. For example, to protect the services we provide and our business operations; to protect our rights or those of our stakeholders; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **Retention**

We apply a general rule of keeping personal data only for as long as required to fulfill the purposes for which it was collected. However, in some circumstances we may retain personal data for other periods of time, for instance where we are required to do so in accordance with legal, tax and accounting requirements, or if required to do so by legal process, legal authority or other governmental entity having the authority to make the request, for so long as required. In specific circumstances, we may also retain your personal data for longer periods of time corresponding to a statute of limitation so that we have an accurate record of your dealings with us in the event of any complaints or challenges.

## **California Residents' Rights**

Under the CCPA, California residents have the following rights (subject to certain limitations):

- **Opt out of sales and sharing:** The right to opt-out of our sale and sharing of their personal information.
- **Limit uses and disclosure of sensitive personal information:** The right to limit our use or disclosure of sensitive personal information to those authorized by the CCPA. We do not collect, use, or disclose sensitive personal information, thus this right is not available to California consumers.
- **Deletion:** the right to the deletion of their personal information that we have collected, subject to certain exceptions.
- **To know/access.** The right to know what personal information we have collected about them, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about them.
- **Correction.** The right to correct inaccurate personal information that we maintain about them.
- **Non-discrimination.** The right not to be subject to discriminatory treatment for exercising their rights under the CCPA.

## Submitting CCPA Requests

### **Requests to know/access, correct, and delete**

California residents may submit CCPA requests to access/know, correct and delete their personal information maintained by us by making a request on our website [here](#), or by submitting a request by calling the Graphic Packaging Business Conduct Alertline at 1-866-898-3750. Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. Authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

You may only make a verifiable consumer request to know/access twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will process your request based upon the personal information in our records that is linked or reasonably linkable to the information provided in your request. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor.

### **Requests to Opt Out**

California residents may exercise their right to opt out online by utilizing our cookie preference manager here to opt out of targeting cookies. In addition, our website responds to global privacy control—or “GPC”—signals, which means that if we detect that your browser is communicating a GPC signal, we will process that as a request to opt that particular browser and device out of sales and sharing (i.e., via cookies and tracking tools) on our website. Note that if you come back to our website from a different device or use a different browser on the same device, you will need to opt out (or set GPC for) that browser and device as well. More information about GPC is available at: <https://globalprivacycontrol.org/>.

### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice’s effective date.

Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please email us at [California-Privacy@graphicpkg.com](mailto:California-Privacy@graphicpkg.com) or call our toll free Alertline at 1-866-898-3750. If you would like to report a violation of this policy, you may also call our toll free Alertline at 1-866-898-3750 or file a report online at [gpibusinessconductALERTline.ethicspoint.com](http://gpibusinessconductALERTline.ethicspoint.com).