

PRIVACY POLICY REGARDING RECRUITMENT AT CANPACK IN THE NETHERLANDS

This Privacy Policy reflects on the recruitment procedure at CANPACK NL Holdings B.V. and/or CANPACK Netherlands B.V. (CANPACK NL) and is applicable to all who apply at CANPACK NL.

Who is responsible for the processing of your personal data?

CANPACK NL is the data controller responsible for the processing of your personal data. If you agree that we keep your application and other information which you provided to us during the recruitment process for purposes of other recruitment processes at CANPACK NL for up to 1 year after the end of the recruitment process, the personal data will be processed by CANPACK NL and its parent company CANPACK S.A., ul. Marii Konopnickiej 29, 30-302 Kraków, Poland, acting as joint controllers within the meaning of Article 26 of the GDPR. The joint controllers will use the personal data for future recruitment processes for purposes indicated in point 4 below. The joint controllers have executed specific and separate joint controllership agreement pursuant to Article 26 of GDPR, the key content of which is available on demand at data.protection@canpack.com. CANPACK S.A. has been designated as a contact point for data subjects with the reservation that data subjects can exercise their rights under the GDPR vis-à-vis each individual Data Controller.

What personal data do we process about you?

When you apply for a job with us, we may process the following personal data of you:

- Personal details: your full name, (job)title(s) and gender.
- Demographic information: date of birth, place of birth, language(s).
- Contact details (work): e.g. (mobile) phone number, e-mail address, work address.
- Contact details (private): e.g. (mobile) phone number, e-mail address, address.
- Information on your career: previous work, education, training and qualifications
- Information on current compensation/employment conditions: details of employment e.g. contract type, working hours and holiday allowance.
- Other personal data provided by you: e.g. availability to start work/for notice period that you provide to us, and information included on your resume and letter of application.

Why do we process this personal data and what are the applicable legal grounds?

We will process your personal data for the following purposes, based on the following legal grounds listed in relation to each specific purpose:

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Purposes of processing	Legal grounds for processing.
	We process your personal data only if this is allowed under one of the legal processing grounds.
Recruitment and selection of (potential) personnel	<p>Your consent. we will process your personal data if you have provided us with your consent to do so. This may, for example, be the case if we have decided not to conclude an employment agreement with you, but requested your consent to retain your information for one year instead of our usual retention term of four weeks after completing your job application process.</p>
	<p>We may request such consent, for example, to be able to consider and contact you for a different job opening after completion of your application.</p> <p>You may of course withhold your consent at any time, which will not have any detriment to the assessment of your application.</p> <p>You may also withdraw your consent at any time by sending us an email (see our contact details below). We will then erase your personal data insofar the processing thereof is based on your consent. If you withdraw your consent, such withdrawal will not affect the lawfulness of our processing of your personal data before your withdrawal of your consent.</p> <p>Performance of a contract. In case you apply for a position with us, and we have decided to enter into an (employment) agreement with you, we will process your personal data based on such agreement, including insofar as necessary to enter into this agreement.</p>
Handling of disputes and other legal matters.	Legitimate interest. Your personal data may be processed based on our legitimate interests in handling disputes and legal matters, including protecting our legal interests.
Complying with legal requirements	Legal requirement: Your personal data may be processed to comply with a legal obligation to which we are subject.

How did we obtain your information?

In most of the cases, we obtain your personal data directly from you. We may also collect your personal data from external parties to check your references if you

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provided your consent to us do so. Furthermore, we may also obtain your personal data through the internet and social media, to the extent permitted by law. Additionally, we may obtain your personal data through recruitment agencies that introduce you to us.

Automated decision making/profiling

In the context of the recruitment of personnel, no form of automated decision making - including profiling - is used by us.

How long do we retain your information?

Personal data of job applicants will be retained no longer than is necessary for the purpose of the relevant processing activity, which means that your personal data will not be retained longer than 4 weeks after completion of the application procedure, unless:

- You are subsequently employed by CANPACK NL;
- You have provided your consent to us for retaining your personal data up to one year after completion of the application procedure, and you have not been employed by CANPACK NL upon completion of your application procedure;
- We need to process your personal data for handling disputes or other legal matters, or
- We need to process your personal data to comply with a legal requirement.

Who will have access to your personal data?

In addition to authorized personnel of CANPACK NL or CANPACK S.A. involved in the recruitment process that have access to your personal data only on a need-to-know basis, we may share your personal data with the parties mentioned below in the context of our recruitment activities.

- Service providers. We may share your personal data with service providers, recruitment firms, consulting firms, IT services providers, auditors, counsels and other professional advisors;
- Public authorities. If required by law, a judicial decision, or other decision of a competent public authority, we will share your personal data in line with such obligation for as far as necessary.

Some of our service providers may be located outside the European Economic Area in countries which do not provide an adequate level of protection from the EU data protection law perspective. In such case we take all necessary measures to ensure that such transfers are adequately protected as required by the GDPR, such as Standard Contractual Clauses for protection of personal information approved by the European Commission, providing appropriate and suitable safeguards for the transfer.

If it is required for the purposes of our legitimate interest for corporate governance and cooperation aiming at following consistent and transparent business and functional strategies at the global level, as well as safety of operations your personal

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data provided for in the recruitment process, may be shared with CANPACK Group parent company Giorgi Global Holdings, Inc., 301 North Market Street, Suite 1414, Wilmington, Delaware 19801, USA and its branch in Belgium, Pegasuslaan 5, 1831 Diegem, contact: data.protection@canpack.com ("GGH"). The data is shared based on Standard Contractual Clauses for protection of personal information.

You may request a copy of the Standard Contractual Clauses and the data transferred outside the EEA by contacting data.protection@canpack.com.

When we use services of a party who processes your personal data on our behalf, acting as a data processor, we have concluded appropriate data processor agreements in line with applicable data protection laws.

Your rights

You have a right of access to your personal data, rectification of your personal data, erasure of your personal data, right to restriction of processing, right to data portability and right to object to processing. You have a right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Please note some of these rights are subject to certain limitations under applicable law.

You have the right to lodge a complaint to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens):
<https://autoriteitpersoonsgegevens.nl/nl/zelfdoen/gebruik-uwprivacyrechten/klacht-melden-bij-de-ap>

Our contact details

Please contact us if you have any questions. You may use the below general contact details.

CAN-PACK NL HOLDINGS B.V. / CAN-PACK NETHERLANDS B.V.
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