

GRAPHIC PACKAGING HOLDING COMPANY (“GPHC”) Privacy Policy

EFFECTIVE DATE: June 28, 2023

In this Privacy Policy (“Policy”), we describe how GPHC collects, uses, and discloses personal information that we obtain about users of our website, www.graphicpkg.com, and other sites that link to this Policy (the “Sites”) and the services available through our Sites (the “Services”). This Policy does not apply to employees or applicants.

Your use of our Sites and Services, and any dispute over privacy, is subject to this Policy and our [Terms of Use](#) (which are incorporated by reference into this Policy), including its applicable limitations on damages and the resolution of disputes.

California Residents: If you are a California resident, please refer to the Privacy Notice for California Residents available [here](#) for important information about the categories of personal information we collect and disclose, as well as your rights under California privacy laws.

EEA/UK Residents: If you are a resident of the EEA or UK, please refer to the EEA-UK Privacy notice available [here](#).

The Information We Collect About You

We collect personal information about you directly from you, automatically through your use of our Sites and Services, and from third parties.

Information We Collect Directly From You. The information we collect from you depends on how you use our Sites and Services.

If you choose to contact us or request additional information via the Sites, we may require you to provide you first and last name, reason you are contacting us, your email address, your postal address and comments. You can also submit information such as when you sign up to receive emails to be alerted about events, press releases, stock quotes, or SEC filings.

Information We Collect Automatically. We automatically collect personal information about your use of our Sites through cookies and other similar technologies. This information includes city and country location, domain name, browser type, IP address, length of time on the Sites, device type used to access our Sites, device ID, operating system, application version, webpages you view on the Sites, your interactions with the Sites, and the referring URL and webpage that led you to our Sites. To the extent permitted by applicable law, we combine this information with other information we collect about you. Please see the section “Our Use of Cookies and Other Tracking Mechanisms” below for more information.

Information We Collect from Third Parties. We may also receive information about you from third parties. For example, based upon the privacy notices and user settings of third party sites, such as LinkedIn, we may receive information about you if other users of a third party website give us access to their profiles and you are one of their “connections” or information about you is otherwise accessible through your “connections” web page, profile page, or similar page on a social networking or other third party website or interactive service. To the extent permitted by applicable law, we combine this information with other information we collect about you.

How We Use Your Information

We use your information, including your personal information, for the following purposes:

- To provide our Sites and Services to you.
- To communicate with you about your use of our Sites and Services, to respond to your inquiries, and for other customer service purposes.
- To tailor the content and information that we may send or display to you, to offer location customization such as events in your region, and personalized help and instructions, and to otherwise personalize your experiences while using the Sites and Services.
- To send you news and information and marketing about our products and services and about products and services of affiliated entities that we think may be of interest to you.
- To assist us in advertising on third party websites, mobile apps, and other online services, and to evaluate the success of our advertising campaigns through third party channels (including our online targeted advertising and offline promotional campaigns).
- To better understand how users access and use our Sites and Services. For example, we might evaluate which features of our Sites and Services are used by members more often.
- To administer our customer loyalty program.
- To administer surveys and questionnaires, such as for market research or member satisfaction purposes.
- To comply with legal obligations, as part of our general business operations, and for other business administration purposes.
- Where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, or violations of our Terms of Service or this Policy.

How We Share Your Information

We may share your information, including personal information, as follows:

- **Service Providers.** We may disclose the information we collect from you to service providers, contractors, or agents who perform functions on our behalf.
- **Affiliates.** We may disclose the information we collect from you to our affiliates or subsidiaries.
- **Business Transfers.** If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company or (ii) if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and third party advisors, including attorneys and consultants.
- **In Response to Legal Process.** We may disclose your information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We may disclose your information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Service or this Policy, or as evidence in litigation in which we are involved.
- **Aggregate and De-Identified Information.** We may share aggregate, anonymized, or de-identified information about users with third parties for marketing, advertising, research or other purposes.

Our Use of Cookies and Other Tracking Mechanisms

EEA or UK: If you are in the EEA or UK, please see our EEA/UK Cookie Policy [here](#).

We and our third party service providers use cookies and other tracking mechanisms to track information about your use of our Sites. We may combine this information with other personal information we collect from you (and our third party service providers may do so on our behalf).

Cookies. Cookies are tiny data files stored in your web browser when you visit a website for record keeping purposes. Some cookies allow us to make it easier for you to navigate our website, while others are used to allow us to track your activities at our website. At www.graphicpkg.com we use cookies to personalize your experience and help us identify and resolve errors.

The use of cookies and similar technologies have for some time been commonplace and cookies, in particular, are important in the provision of many online services. Using such technologies is not, therefore, prohibited by the law, but new regulations do require that people are told about cookies and given the choice as to which of their online activities are monitored in this way.

Our Policy. To make full use of www.graphicpkg.com, enjoy the personalized features and ensure the website works to its full potential, your computer, tablet or mobile phone will need to accept cookies. Visitors to our website who disable cookies will be able to browse certain areas of the website, but some features may not function properly.

About our Cookies. Cookies can be classified as “first party” or “third party”:

- First party cookies: these are cookies placed on your device by our website domain.
- Third party cookies: these are cookies placed on your device by third party website domains.

We use Google Analytics to help monitor and improve our site. Google Analytics is totally anonymous and no personal information is stored. This is the only 1st party cookie currently set by graphicpkg.com.

Our 1st party cookies don't store sensitive information such as your name, address or payment details: they simply hold information about how you use our site so we can improve your experience and resolve any errors.

The social sharing on the site is handled by Social Warfare. Social Warfare may set some 3rd party cookies. We have no control over the 3rd party cookies that Social Warfare sets.

We use essential cookies to ensure website functionality. These cookies are necessary to provide online services (e.g., our website or a service on our website) or are used solely to carry out or facilitate the transmission of communications over a network. Essential cookies will always be activated on our website.

Managing Cookies. If you'd prefer to restrict, block or delete cookies from www.graphicpkg.com, you can do so through the following methods:

1. Browser settings and controls. Each browser is different, so check the “Help” portion of the toolbar of your particular browser (or your mobile phone's handset manual) to learn how to change your cookie preferences. The ‘Help’ menu on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

2. Privacy Preference Center. Clicking on the “Cookies Settings” button in the Cookies Preference Center, found in the bottom right-hand side of the webpage the first time you visit our website, will allow you to confirm your choices with regard to the collection of cookies, including managing your consent preferences for each separate cookie category. Once you’ve confirmed your choices, you will see a “cookie icon” in the bottom left-hand corner of the webpage. You can utilize this icon to change your preferences at any time.

Local Storage Objects. We may use Local Storage Objects (“LSOs”) to store your preference settings, for fraud prevention and to personalize your visit to the Sites.

Clear GIFs, pixel tags and other technologies. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer’s hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs, or pixel tags), in connection with our Site to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about Sites usage. We and our third party service providers also use clear GIFs in HTML e-mails to our customers, to help us track email response rates, identify when our e-mails are viewed, and track whether our emails are forwarded.

Third Party Analytics. We use automated devices and applications, such as Google Analytics, to evaluate usage of our Sites. We also may use other analytic means to evaluate our Sites. We use these tools to help us improve our Sites’ performance and user experiences. These entities may use cookies and other tracking technologies, such as web beacons or LSOs, to perform their services. To learn more about Google’s privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent their data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

Third-Party Ad Networks

We may use third parties such as network advertisers to serve advertisements on third-party websites or other media (e.g., social networking platforms). This enables us and these third parties to target advertisements to you for products and services in which you might be interested. Third-party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third-party cookies and other technologies are governed by each third party’s specific privacy policy, not this one. We may provide these third-party advertisers with information about you.

Users in the United States may opt out of interest based advertising. For example, you may go to the Digital Advertising Alliance (“DAA”) [Consumer Choice Page](#) for information about opting out of interest-based advertising and their choices regarding having information used by [DAA companies](#).

Opting out from one or more companies listed on the DAA [Consumer Choice Page](#) will opt you out from those companies’ delivery of interest-based content or ads to you, but it does not mean you will no longer receive any advertising through the Sites or Services, or on other websites. You may continue to receive advertisements, for example, based on the particular website that you are viewing (i.e., contextually based ads). Also, if your browsers are configured to reject cookies when you opt out on the DAA website, your opt out may not be effective. Additional information is available on the DAA’s website at www.aboutads.info.

Third-Party Links

The Sites and Services may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third party websites. We are not responsible for the information practices of such third party websites.

Security of My Personal Information

We have implemented reasonable precautions to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our best efforts, no data security measures can ever completely guarantee security.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a unique and robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords.

What Choices Do I Have Regarding Use of My Personal Information?

Marketing Communications. We may send periodic promotional emails to you. You may opt-out of promotional emails by following the opt-out instructions contained in the email. If you opt-out of receiving promotional emails, we may still send you emails about any services you have requested or received from us.

Privacy Signals. If our Site recognizes that your browser is communicating a Global Privacy Control (GPC) signal, we will store this as an opt-out of “Sale and Sharing of personal information” and “Targeting Cookies” for that browser. Note, if you come back to our Site from a different device or use a difference browser on the same device, you will need to set GPC from that browser as well.

Children

Our Sites and Services are not designed for children. If we discover that a child has provided us with personal information, we will delete such information from our systems.

Contact Us

If you have questions about the privacy aspects of the Sites or Services or would like to make a complaint, please contact us at GPICorporateCommunications@graphicpkg.com

Changes to this Policy

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Sites and update the effective date of this Policy. If we make any changes to this Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Sites.