

## Privacy Notice for California Residents

This **Privacy Notice for California Residents** supplements the information contained in the Graphic Packaging Holding Company (“GPHC”) Privacy Policy above 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 of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

### Information We Collect

Our Website collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with your or your devices (“**personal information**”). In particular, our website has collected the following categories of personal information from consumers within the last twelve (12) months:

- **Identifiers.** For example, 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.
- **Personal Information Categories Listed in the California Customer Records Statute.** Including your name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, or employment history.
- **Protected Classification Characteristics.** Including 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 childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
- **Internet or Other Similar Network Activity.** Such as browsing history, search history, information on your interaction with a website, application, or advertisement.
- **Professional or Employment Related Information.** Including your current or past job history, educational history, skills and experience.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California

Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

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.

### **Use of Personal Information**

We may 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, our benefits, or to apply for a job with us, we will use that personal information to respond to your inquiry or process your application.
- 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 set forth in the CCPA.
- 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.

### **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties to process your application for employment and engage in onboarding services: benefit providers, payroll and expense system providers, vendors that provide employee onboarding and offboarding services, document storage providers government agencies (e.g., Department of Labor), and travel agencies and airlines.

We may also share your personal information, including identifiers, location information and internet and network activity information, with vendors that help us maintain our information technology systems and data.

We may also share your personal information as required to comply with the law or legal obligations (e.g., subpoenas, legal orders and government requests, or to comply with court requests or law enforcement agencies), or as needed to support auditing, compliance, and corporate governance functions.

In addition to the above, we may disclose your personal information such as identifiers, demographics and location information in the event we go through a business transition such as a merger, acquisition by another company, bankruptcy, reorganization, or sale of all or a portion of our assets; to combat fraud or criminal activity, and to protect our rights, users, and business partners; with our parent companies, affiliates, and subsidiaries who may only use the personal information for the purposes described in this Privacy Statement; if the information has been aggregated, de-identified, or otherwise does not identify you personally; and otherwise with your consent.

### **Sales of Personal Information**

GPHC does not sell personal information.

### **Your Rights and Choices**

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### **A. Access to Specific Information and Data Portability Rights**

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, each category of personal information that each category of recipient obtained.
- The Company does not sell Personal Information.

#### **B. Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, take actions reasonably anticipated within the context of our ongoing business or employment relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right legal right.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **C. Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by sending us a message on our website. Only you, or a person registered with the California Secretary of State 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.

You may only make a verifiable consumer request for access or data portability 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 cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only

use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

#### **D. Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### **E. Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights.

#### **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 (a) 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; or (b) wish to exercise your rights under California law, please do not hesitate to contact us as follows

- Via our website: please send us an electronic message through our website
- Email us at [California-Privacy@graphicpkg.com](mailto:California-Privacy@graphicpkg.com).
- Write us at our address listed on our webpage.