

## Privacy Policy

### GENERAL

This Online Privacy Notice ("Notice") provides you with important information about how International Paper – Kwidzyn Sp. z o.o. ("IPK") processes your personal data. IPK is committed to protecting the confidentiality, accuracy and integrity of your personal data. Below you will find information for website users, suppliers and customers.

IPK reserves the right to change or update this Notice at any time.

### Controller

Below are the contact details of the 'Controller' of your data - that is, the entity:

Controller	Contact details
<b>INTERNATIONAL PAPER – KWIDZYN SP. Z O.O.</b>	ul. Lotnicza 1 82-500 Kwidzyn Telephone: +48 55 610 8000 <a href="mailto:datenschutz@mayr-melnhof.com">datenschutz@mayr-melnhof.com</a>

### WEBSITE USERS

#### 1. Purpose and Legal Basis

There are many actions you can take on the IPK website. Below is an overview of the way in which you may choose to use our site, with information as to how we would process your personal data.

Website users	
<i>Proposi of the processing</i>	<i>Legal Basis</i>
(i) Technical provision of our site; (ii) Provide information about our services and products and understand your interests.	(i) Article 6(1)(f) GDPR: Our legitimate interest is the successful provision of our website; (ii) Article 6(1)(f) GDPR: Our legitimate interest is to provide you with information about products and services we offer, and understand your interests in relation to these.

Contact	
<i>Purpose of the processing</i>	<i>Legal Basis</i>
Facilitate contact and communications.	Article 6(1)(f) GDPR: Our legitimate interest is in responding to your request/contacting you where you so request.

Careers	
<i>Purpose of the processing</i>	<i>Legal Basis</i>

Process your job application.	Article 6(1)(b) GDPR.  <i>The provision of personal data is not required by law or by contract, however, without the personal data, the purpose cannot be achieved.</i>

Newsletter	
<b>Purpose of the processing</b>	<b>Legal Basis</b>
Sending our newsletter.	Art. 6(1)(a) GDPR <b><i>(Your consent can be withdrawn at any time with future effect)</i></b>

## 2. Recipients

We only share your personal data with further recipients where it is necessary for the relevant purpose. Below are recipients with whom we may share your personal data. We will never share your personal data unnecessarily.

Recipient	Function
IPK	IPK may share your personal data with our affiliates and/or subsidiaries where necessary for the purposes as stated above.
Dienstleister	IPK may share your personal information with unaffiliated third parties who perform administrative, marketing, professional or technological support functions. IPK only does this where it is necessary for fulfilling the above stated purposes.
Behörden	IPK may be required to disclose personal information by law or legal process. We reserve the right to contact appropriate authorities when activities that are illegal or violate our policies occur on our website.

## 3. Transfers to third countries and/or international organisations

Even if you are located in the European Union, personal data collected whilst you use this website may be processed in a country where the adequacy of that country's data protection laws have not been approved by an adequacy decision of the European Commission. Where we transfer personal data in this manner, IPK will ensure that any such agreements involving the processing of your personal data will be concluded so that your personal information is protected by adequate safeguards, including under standard EU contractual clauses for the transfer of data.

If you would like more information as to how we protect your personal data in these circumstances, please contact the Controller with the contact details that we provided above.

## 4. Storage

IPK only stores your personal information for a period reasonable for our purposes of processing and/or for a period of time as required by law.

If you would like more information about our retention periods, please contact the Controller with the contact details that we provided above.

## **5. Google Analytics und Cookies**

Whilst we do not interfere with any cookies preferences you have submitted with your browser, this website does use Google Analytics - a web analysis service provided by Google Inc. ('Google'). If you have consented to the processing of third party cookies in your browser settings, your personal information will be processed in this way by our site. Cookies will process information about your visit (pages clicked, session details etc.), as well as technical information that distinguish you as a user.

Google Analytics uses "cookies"; these are text files which are stored on your computer to analyze the way you use the website. The information about the way you use this website created by the cookie is sent to and stored on a Google server in the USA.

If the IP anonymization is activated on this website, Google will first truncate your IP address in Member States of the European Union or in other state parties to the Agreement on the European Economic Area. Only in exceptional cases is the full IP address sent to and truncated on a Google server in the USA. Google uses this information on behalf of the website operator to evaluate the way you use the website, to collate reports on website activities and to provide the website operator other services related to website and Internet use.

In addition, we use Google Conversion Tracking in conjunction with Google Analytics. This will allow us to measure the behavior of our website users. For example, we can see how many PDFs have been downloaded or how many times our contact form has been used. Likewise, we can ascertain how many clicks on advertisements from external sources (AdWords, LinkedIn, Xing, Bing) have led to our website.

The IP address sent by your browser as part of Google Analytics is not combined with other data held by Google. You can change your browser settings to prevent cookies from being stored; however, we draw your attention to the fact that, in these circumstances, you may find that you are unable to make full use of functions on the website. You can also prevent the data (including your IP address) relating to your use of the website which is captured by the cookie being sent to or processed by Google by downloading and installing the browser plug-in from the following link <https://tools.google.com/dlpage/gaoptout?hl=en>.

You can refuse the use of Google Analytics by clicking on the following link. An opt-out cookie will be set on the computer, which prevents the future collection of your data when visiting this website: [Disable Google Analytics](#)

For further information please visit

<https://www.google.com/analytics/terms/us.html> or <https://www.google.de/intl/en/policies/>

## **6. Google DoubleClick**

DoubleClick by Google is a service of Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google"). Doubleclick by Google uses cookies to show you advertisements that are relevant to you. Your browser will be assigned a pseudonymous identification number (ID) to check which ads have appeared in your browser and which ads have been viewed. The cookies do not contain any personal information.

Using the DoubleClick cookie allows Google and its affiliate websites to serve ads based on previous visits to our or other websites on the Internet. The information generated by the cookies is transmitted by Google for evaluation to a server in the USA and stored there. A transfer of the data by Google to third parties takes place only due to legal regulations or in the context of order data processing. In no case will Google match its data with other data collected by Google. By using our web pages, you agree to the processing of the data collected about you by Google and the manner described above, the data processing and the stated purpose.

You can prevent the storage of cookies by a corresponding setting of your browser software, however, we would like to point out that in this case you may not be able to use all the functions of our web pages in full.

You may also prevent the collection by Google of the data generated by the cookies and related to your use of the Website and the processing of such data by Google by downloading and installing the browser plug-in available under a DoubleClick Deactivation Extension link below. Alternatively, you can disable the Doubleclick cookies on the Digital Advertising Alliance website at the following link: <http://optout.aboutads.info/?c=2#!/>

The legal basis for the use of these Google tools is Article 6(1)(f) GDPR, our legitimate interest is the optimization of the website and the delivery of targeted advertising.

## 7. Links

This website may offer external links. When you click on these, your personal data will be shared with the relevant external site. Once you leave the IPK website, the processing of your personal data is no longer regulated by us nor governed by this Notice. Clicking on external links is entirely voluntary. If you do not wish for your personal data to be processed in this way, you do not have to click on these links.

## 7. Newsletter

If you have granted your consent pursuant to Article 6(1)(a) GDPR to the receipt of our newsletter, we will use your e-mail address to regularly send you our newsletter. For the receipt of the newsletter the provision of an e-mail address is sufficient. Unsubscribing is possible at any time, for example via a link at the end of each newsletter. Alternatively you can also send your unsubscribe request to [datenschutz@mayrmeinhof.com](mailto:datenschutz@mayrmeinhof.com)

## INFORMATION FOR CUSTOMERS AND SUPPLIERS

### 1. Purpose and Legal Basis

Below you will find information regarding our processing of personal data from suppliers and customers. This information is intended for customers and suppliers who are natural persons and/or employees of customers and suppliers.

<b>Managing the contractual relationship</b>	
<b><i>Purpose of the processing</i></b>	<b><i>Legal Basis for the processing (EU)</i></b>
(i) Managing contact details;	Artikel 6 (1) (b)  <i>The provision of personal data is not required by law or by contract, however, without the personal data, the purpose cannot be achieved.</i>
(ii) Communication;	
(iii) Customer care.	

<b>Marketing</b>	
<b><i>Purpose of the processing</i></b>	<b><i>Legal Basis for the processing (EU)</i></b>

The provision of marketing materials, advertising, newsletters, technical information or legal updates.	<p>Art. 6 (1) (a): Consent - if explicitly requested.</p> <p><i>Your consent is voluntary and can be revoked at any time with future effect.</i></p> <p>Article. 6 (1) (f) – Our legitimate interest being:</p> <p><i>If your electronic contact details were obtained details were obtained in connection with the sale of a good or service, we may use it for promotional purposes for similar goods or services. You can object to receiving this material at any time.</i></p>
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## 2. Storage

IPK only stores your personal information for a period reasonable for our purposes of processing and/or for a period of time as required by law.

If you would like more information about our retention periods, please contact the Controller with the contact details that we provided above.

## 3. Recipients

We only share your personal data with further recipients where it is necessary for the relevant purpose. Below are recipients with whom we may share your personal data. We will never share your personal data unnecessarily.

Recipient	Function
MM Group	IPK will transfer your personal data to subsidiaries and/or affiliates where this is necessary to provide the relevant services, or to such extent that their assistance is required to fulfil the relevant purpose.
Third parties	<ol style="list-style-type: none"> <li>1. Where your personal data is managed in a CRM system, your personal data will be passed on to those service providers and processed accordingly.</li> <li>2. Where we hire external service providers to assist us in advertising and/or promotional activities, your personal data will be shared and processed accordingly.</li> </ol>

## 4. Transfer to third countries and/or international organisations

Your personal data is generally not transferred to third countries outside of the EU/EEA. In individual cases, due to the global nature of many business relationships, a transfer to such third countries may be required. For such processing, IPK will make appropriate arrangements to ensure the protection of your personal data by means of recognised EU standards, generally by EU standard contractual clauses for the transfer of personal data.

If you would like more information about how we protect your personal data in such circumstances, please contact our the Controller using the contact details above.

## INFORMATION FOR INVESTORS AND PRESS

### 1. Purpose and Legal Basis

Below you will information for the press and for investors as to how IPK process your personal data, insofar as the activity relates to natural persons and/or their employees.

Information, Communication, Public Relations	
Purpose of the processing	Legal Basis for the processing (EU)
(i) Managing contact details;	Article 6 (1)(b),(c),(f)
(ii) Communication;	Where the processing is based on Article 6(1)(f), our legitimate interest lies in supporting our investors and in public relations
(iii) Fulfilling transparency obligations.	<i>If your electronic contact details were obtained details were obtained in connection with the sale of a good or service, we may use it for promotional purposes for similar goods or services. You can object to receiving this material at any time.</i>

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MM Group	IPK will transfer your personal data to subsidiaries and/or affiliates where this is necessary to provide the relevant services, or to such extent that their assistance is required to fulfil the relevant purpose.
Dritte	<ol style="list-style-type: none"><li>Where your personal data is managed in an IT system, your personal data will be passed on to those service providers and processed accordingly.</li><li>Where we hire external service providers to assist us with PR activities, your personal data will be shared and processed accordingly.</li></ol>

### 4. Transfers to third countries and/or international organisations

Your personal data is generally not transferred outside of the EU/EEA.

## **YOUR RIGHTS**

You have the following legal rights over your personal data. You can contact the Controller if you would like to exercise these rights, or if you would like further information.

### **1. Access to your data - Article 15 GDPR**

You have the right to request information as to whether we process your personal data, and access to this personal data.

### **2. Rectification of your data - Article 16 GDPR**

You have the right to the rectification of your personal data that is inaccurate or incomplete, this includes by means of a supplementary statement.

### **3. Erasure of your data - Article 17 GDPR**

You have the right to ask us for the erasure of your personal data, where no exemption for retaining the personal data applies.

### **4. Restriction of our processing of your data - Article 18 GDPR**

You have the right to request a restriction on the processing of your personal data in particular circumstances;

### **5. Data Portability - Article 20 GDPR**

In some circumstances, you may be entitled to request that your personal data be provided to you in machine readable format. This is applicable where the processing of your personal data is based on consent (Article 6(1)(a)), where special categories of personal data are being processed based on consent (Article 9(2)(a)), or where your personal data is processed on the basis of Article 6(1)(b). This right to data portability includes the right to have your personal data transferred directly to another controller.

## **6. Data Subject Rights: Objection**

### ***Objection to our processing of your data - Article 21 GDPR***

**Where your personal data is processed for the purpose of performing tasks carried out in the public interest (Article 6(1)(e)), for the purpose of legitimate interests of the controller (Article 6(1)(f)), or for the purpose of direct marketing and profiling related to this (Article 21(2)), you are able, based on the grounds relating to your particular situation, to object to the processing of your personal data.**

## **Complaints**

You always maintain the right to submit a complaint to the relevant supervisory authority regarding our processing of your personal data.