

Privacy Notice

Smurfit Cartón v Papel de México. S.A. de C.V.

Responsible for the protection of Personal Data:

Smurfit Cartón y Papel de México, S.A. de C.V., its affiliates and/or subsidiaries (hereinafter "**Smurfit**"), with address at Boulevard Miguel de Cervantes Saavedra No. 301, North Tower 8th Floor, Colonia Granada, Alcaldía de Miguel Hidalgo, C.P. 11520, Mexico City, Mexico, are responsible for collecting your Personal Data, for the use of such data and for its protection in terms of the provisions of the Federal Law on the Protection of Personal Data in the Possession of Individuals, its Regulations and other applicable provisions (hereinafter the "**Data Law**"). You may access the content of these regulations through the National Institute of Transparency, Access to Information and Protection of Personal Data's (hereinafter referred to as "INAI" by its acronym in Spanish) internet page, at the following address: www.ifai.gob.mx.

Smurfit is responsible for the treatment of your Personal Data, as well as guarantee your privacy and your right to information self-determination. Therefore, the Personal Data obtained will be treated in a responsible and confidential way, regulating the rights of access, rectification, cancellation and opposition to the treatment of such data, in terms of article 19 of the Data Law.

What will be the main treatment of your Personal Data?

At Smurfit we consider it valuable to have a close and active relationship with our clients, suppliers, employees, candidates, volunteers, beneficiaries, donors, carriers and contractors (hereinafter referred to as the "**Owner**"). Because of this, we may collect your Personal Data for the purposes mentioned in this Privacy Notice. We inform you that Smurfit will process and safeguard your Personal Data based on the principles of legality, quality, consent, information, purpose, loyalty, proportionality and responsibility, as set forth in the Data Law and its Regulations.

Owner's Consent

It will be understood that the Owner is tacitly aware of the treatment of his data when, having made this Privacy Notice available to him, he does not express his opposition.

For the purposes of the provisions of Article 17 of the Data Law, the Owner states that

- (i) This Privacy Notice has been made known to you by Smurfit.
- (ii) They have read, understood and agreed to the terms set out in this Privacy Notice,

and therefore consent to the processing of your Personal Data for the purposes of the Data Law and other applicable legislation.

In the event that the Personal Data collected includes sensitive or financial Personal Data, either in printed format, or using electronic ways, as applicable, and in their corresponding processes for the acquiring of consent, for example, but not limited to, the provision of sensitive Personal Data through the dialogue windows, or the display of terms and conditions, acts that constitute the express consent of the in terms of the second paragraph of Article 9 of the Data Law and other applicable legislation.

(iii) They give consent for Smurfit to transfer Personal Data to third parties, either national or foreign, in the understanding that the treatment given by such third parties to the Personal Data shall be in accordance with the provisions of this Privacy Notice.

If the Owner does not object to the terms of this Privacy Notice within 48 hours of it being made available to him, its contents shall be deemed agreed and consented to, in terms of the third paragraph of Article 8 of the Data Law. The consent of the Owner may be revoked at any time they decide to do so without retroactive effect, on the terms and according to the procedures set forth below for that purpose under this Privacy Notice.

Notwithstanding any provision of this Privacy Notice, the Owner acknowledges that his/her consent will not be required for the processing of Personal Data by Smurfit or third parties in any of the cases set forth in Article 10 of the Data Law.

What are the main purposes of collecting your Personal Data?

We will only use the Personal Data, sensitive Personal Data and financial or patrimonial data that you provide us for the purpose for which they were collected. You can be sure that we will be responsible for providing you with all the necessary information regarding the purpose of the use of your data, the treatment of the same, the restrictions on their use, the details necessary to provide you with the privacy you need, as well as the means you will have at your disposal to exercise your ARCO rights as the owner of Personal Data.

- **For Candidates:** We collect your Personal Data and sensitive Personal Data necessary to be considered as a candidate in a recruitment, evaluation and/or selection process.
- **For employees who collaborate for Smurfit:** In this case, we will collect and process your Personal Data, sensitive Personal Data or patrimonial data, start an individual employee file, prepare the employment contract, have a record of your previous employment, identify you as a Smurfit employee, perform all the formalities and/or internal procedures to carry out your hiring and comply with the employment benefits acquired under the employment relationship, to allow access to the

Corporate Office and the Plants by fingerprint, to contact him/her and make him/her aware of relevant information by virtue of his/her status as a Smurfit employee, to perform the corresponding medical, psychometric and socioeconomic exams, in terms of Smurfit hiring policy, to provide medical care in case of emergency, to register him/her in the I.M.S.S., perform and publish through various media.

- **For unionized employees who collaborate for Smurfit:** In this case we will collect and process your Personal Data, sensitive personal or patrimonial data, start an individual employee file, prepare the labor contract, have a record of your previous employment, identify you as a unionized employee of Smurfit, perform all the formalities and/or internal procedures to carry out your hiring and comply with the labor benefits acquired under the labor relationship, to allow access to the Plants by fingerprint, to contact him/her and make him/her aware of relevant information by virtue of his/her status as a Smurfit employee, to perform the corresponding medical, psychometric and socioeconomic exams, in terms of Smurfit hiring policy, to provide medical care in case of emergency, to register him/her in the I.M.S.S., perform and publish through various media.
- **For Smurfit clients:** We may collect your Personal Data, sensitive Personal Data and patrimonial or financial data in order to provide the corresponding service, offer you our products and comply with legal obligations, as well as to perform and publish through various means.
- **For Smurfit providers:** We collect your Personal Data, sensitive personal and financial data necessary to initiate or fulfill a future or current business relationship in order to purchase your services or products.
- **For volunteers who wish to collaborate or collaborate for the Smurfit Foundation:** In this case, we will collect and process your Personal Data or sensitive Personal Data to carry out the processes of recruitment, selection and, where appropriate, integration to the working groups, perform and publish through various means.
- **For Smurfit Foundation beneficiaries:** In this case, we will collect and process your Personal Data, sensitive personal or patrimonial data in order to carry out the identification and statistical processes, consider you as a prospect and/or participant in the projects, programs and/or activities of the Foundation, carry out and publish through various means.
- **For Donors:** In this case, we will collect and process your personal and/or patrimonial or financial data to document your donation, contact you, issue the corresponding

receipt and generate the donation report.

- **For Contractors and Carriers:** We collect your Personal Data and sensitive Personal Data necessary to identify the contractor and/or carrier personnel entering the plant, to corroborate that the contractor and/or carrier is registered with the I.M.S.S., to draw up the commercial contract if applicable, to verify that the contractor and/or carrier has medical assistance, to know their state of health and to know the competence of the personnel.

Personal Data Safety and Security

Smurfit is committed to safeguarding your Personal Data, sensitive personal information and financial or property data under strict administrative, technical and physical security measures, in order to protect them against damage, loss, alteration, destruction, unauthorized use, access or treatment.

Smurfit will keep the Owner's Personal Data for as long as necessary to process his/her information, product and/or service requests, as well as to maintain accounting, financial and auditing records in terms of the Data Law and the commercial, fiscal and administrative legislation in force. The Personal Data of the Owner collected by Smurfit will be protected by adequate administrative, technical and physical security measures against damage, loss, alteration, destruction or unauthorized use, access or treatment, in accordance with the provisions of the Data Law and the administrative regulation derived from it.

Smurfit may disclose your Personal Data, in order to comply with applicable legal provisions or as required by the competent authority, as well as to carry out the purposes for which it was collected. Therefore, Smurfit may make national or international data transfers, as well as transfer data to service provider entities in order to comply with the established purposes, except for sensitive Personal Data that requires your express authorization to be disclosed in accordance with the Data Law.

What rights do you have as Owner of Personal Data?

We would like to remind you that you, as the Owner of your Personal Data, may request to exercise your ARCO rights (Access, Rectification, Cancellation or Opposition), and which are described below:

- (i) Right of Access.- The Owner has the right to know about the Personal Data related to his/her person that is in Smurfit's possession, as well as to whom they have been shared with and for what purpose.
- (ii) Right to Rectification: Each Owner has the right to have his/her Personal Data

rectified when they are inaccurate or incomplete.

(iii) Right of Cancellation.- Each Owner has the right to request at any time that his/her Personal Data be deleted, which will happen once the blocking period has elapsed. The blocking implies the identification and conservation of the Personal Data, once the purpose for which it was collected has been fulfilled, and possesses purpose to determine the possible responsibilities in relation to its treatment, until the legal or contractual prescription period of these has ended. During said period, the Personal Data will not be processed and once this period has elapsed, it will be erased from the corresponding database or file. Once the corresponding data is erased, Smurfit will give the Owner the corresponding notice. In case the Personal Data has been transferred prior to the correction or deletion date, and continues to be processed by third parties, Smurfit will inform the third party in question of the request for correction or cancellation, so that they can proceed with it as well.

(iv) Right of Opposition - The Owner has the right to request, at any time, whenever he/she has a legitimate cause, that Smurfit stops processing his/her Personal Data.

Procedure to exercise ARCO rights.

To exercise ARCO Rights, the Owner or his/her representative must submit a written request for access, rectification, cancellation or opposition with the following information and documentation:

(i) Name and address of the Owner or other means of communicating the response to your request.

(ii) Documents that accredit their identity (simple copy in printed or electronic format of their voter's credential, passport or temporary or permanent residence) or, in their case, the legal representation of the Owner (simple copy in printed or electronic format of the simple power of attorney with autographic signature of the Owner, the representative and their corresponding official identifications (voter's credential, passport, temporary or permanent residence).

(iii) The clear and precise description of the Personal Data regarding which it seeks to exercise any of the ARCO Rights.

(iv) Any other element or document that facilitates the location of the Personal Data of the Owner.

In the case of requests for rectification of Personal Data, the respective Owner must also indicate the modifications to be made and provide the documentation supporting their request.

For the reception, registration and attention of the requests to exercise your right of access, rectification, cancellation and opposition to your Personal Data, as well as to limit the use or

disclosure of your data, and other rights provided in the Data Law, please contact the following e-mail:

privacidad@smurfitkappa.com.mx

Smurfit will respond to the respective Owner within a maximum period of twenty business days, counting from the date the request for access, rectification, cancellation or opposition was received, the determination made, so that, if applicable, it becomes effective within fifteen days from the date the answer is communicated to the Owner. In the case of requests for access to Personal Data, Smurfit will proceed with their delivery upon proof of identity of the applicant or his/her legal representative, as applicable. The deadlines referred to above may be extended only in terms of the Law, in accordance with article 32 of the Data Law.

The delivery of the Personal Data will be free of charge, only the justified expenses of shipment or the cost of reproduction in copies or other formats will be covered.

For purposes of requests for cancellation of Personal Data, in addition to the provisions of this Privacy Notice, the provisions of Article 26 of the Data Law shall apply, including the cases of exception for cancellation of Personal Data indicated.

Use of Cookies:

Cookies are small text files that a web server sends to your computer, which are used to provide you with better service regarding our products and/or services. One-session cookies remember the activity you previously performed on our website. Persistent cookies even make it possible to save your preferences in the various sessions in which you visit our website, allowing us to personalize, for example, the way in which our website makes information of interest to you available.

Cookies may also be used to show you notices, news and/or recommendations that may be of interest to you, in accordance with your past activities on our website. Cookies are also used to implement strategies that allow us to raise the quality of our products and/or services.

Web beacons are usually graphic images that are placed on a website and are used to count the number of visitors to a website or may even allow access to some cookies. The use of beacons on our website is intended to reflect statistics regarding products and/or services that are of interest. These web beacons do not normally collect information other than what your browser provides us with as a standard part of any internet browsing. If you choose to disable cookies in your web browser, the web beacon will no longer be able to specifically track your activity.

Most browsers or internet browsers allow you to disable or allow the use of cookies. You can

also delete cookies from your computer if your browser permits. If you disable cookies, you may not be able to use certain parts of our website and a rejection cookie may need to be reinstalled. In any case, you will have several options to limit the access of cookies and web beacons from our website to your computer.

For more information on the use of cookies, see the following link <https://www.smurfitkappa.com/mx/cookie-policy>

About the transfer of your Personal Data:

Once the terms set forth in this Privacy Notice have been read, understood and agreed upon, the Owner expresses his/her consent for Smurfit to transfer Personal Data to national or foreign third parties, in the understanding that the treatment given by such third parties to the Owner's Personal Data must comply with the provisions of this Privacy Notice.

The Owner acknowledges and accepts that Smurfit does not require authorization or confirmation from said Owner to transfer national or international Personal Data in the cases provided for in Article 37 of the Data Law or in any other case of exception provided for by the same or other applicable legislation.

Changes to the Privacy Notice:

This Privacy Notice may be modified in the future. In any case, any modification to it will be made known to you by publishing it on the website:

<http://www.smurfitkappa.com.mx>

Smurfit reserves the right to periodically update this Notice to reflect changes in our information practices. It is the Owner's responsibility to periodically review the content of the Privacy Notice on the above-mentioned site. Smurfit will understand that if not otherwise stated, it means that the Owner has read, understood and agreed to the terms stated, which constitutes his/her consent to the changes established in such updates regarding the treatment of his/her Personal Data for the purposes of the Law and other applicable legislation.