

Privacy Notice

1. About this Privacy Notice

In this Privacy Notice, your personal data means any information which Smurfit Westrock Group and Smurfit Westrock Polska processes about you from which you can be directly or indirectly personally identified ("**Personal Data**").

This Privacy Notice applies to Personal Data that we and/or on our behalf by our third party service providers collected and process in the course of your dealings with us.

Smurfit Westrock is a global company with locations around the world. A full list of entities in the Group is available [here](#). As part of our global approach, we endeavour to adopt consistent approaches to our processing of Personal Data to the extent possible. Depending on the region in which you are located, the entities within the Group have established procedures in place to ensure that your Personal Data is protected.

If you have any questions on this Privacy Notice, please contact the Group Legal Department at grouplegal@smurfitwestrock.com (Smurfit Westrock Group) or with GDPR Team at daneosobowe.poland@smurfitwestrock.pl (Smurfit Westrock Polska).

2. What Personal Data we process

Smurfit Westrock Polska as data controller process Personal Data:

- Marketing and business contacts
- Website users,
- Social media users
- Existing customers
- Potential customers
- Existing contractors other than customers,
- Potential contractors other than customers
- Persons authorised to represent

Smurfit Westrock Group as data controller processes data of visitors to the website (www.smurfitwestrock.com) as far as cookies are concerned. For more information on the use of cookies, please refer to the Cookies Policy.

3. Categories of Personal Data Collected

Depending on the nature of your dealings with us, we may process the following types of Personal data about you:

- **If you are a marketing/business contact, including the one designated to perform contracts:** your name, name of your employer / entity you represent, your position, your address and contact details, your business activities and interests, your image – if participating in events organised by Smurfit Westrock Polska as well as information relating to your subscription to, receipt of or interest in any of our mailing lists or newsletters.
- **If you use the Website:** information about your visits to our Website: IP address, operating system and browser used to access our website, internet service provider and time and date the website accessed in the case when you use the "Contact us" form - additionally also the data you provide in this form and data concerning marketing consents,

- **If you interact with our social media accounts:** name, location, country, job title, company, area of interest, provided that these types of personal data are publicly visible from your social media accounts, other data disclosed in the user profile, data provided in the content of comments and messages
- **If you are an existing customer:** your name, name of your entity, your address and contact details, billing information, details of your visits and your correspondence and communications with our staff, your image – if participating in events organised by Smurfit Westrock Polska as well as any information which is provided to us by you or on your behalf,
- **If you are a potential customer:** your name, name of your entity, your address and contact details, details of your visits and your correspondence and communications with our staff, your image – if participating in events organised by Smurfit Westrock Polska as well as any information which is provided to us by you or on your behalf.
- **If you are an existing contractor other than customer:** your name, name of your entity, your address and contact details, billing information, details of your visits and your correspondence and communications with our staff, as well as any information which is provided to us by you or on your behalf,
- **If you are a potential contractor other than customer:** your name, name of your entity, your address and contact details, details of your visits and your correspondence and communications with our staff, as well as any information which is provided to us by you or on your behalf,
- **If you are a person authorized to represent:** your name, name of entity you represent, position, details of your visits and your correspondence and communications with our staff, as well as any information which is provided to us by you or on your behalf or information which was obtained from public registers to the extent disclosed therein.

4. Purposes for Processing Personal Data

MARKETING AND BUSINESS CONTACTS

If you are a marketing/business contact, including the one designated to perform contracts we may process your Personal Data for the following purposes:

- To promote Smurfit Westrock Polska business activities;
- To invite you to events;
- To establish, develop and maintain relationships with you;
- To manage and administer our relationship with our marketing/business contacts representing an existing / potential customer / contractor other than customer;
- To contact you regarding the implementation of contracts;
- To send you marketing materials, newsletters and other information;
- To monitor and analyse your interest in the material we send to you;
- To send you marketing information by post;
- To carry out customer satisfaction and other surveys;
- To document events organized by Smurfit Westrock Polska by taking photos or filming.

In these circumstances we generally rely on your consent to your personal data being processed and, in the case of sending you marketing materials by e-mail or over the phone, based on your separately given consent for such activities. In some circumstances (e.g. when we maintain business relationship with you and we send you our marketing materials by post) we will rely on our legitimate interest. The legal basis of our legitimate interest will also be used in order to establish, develop and maintain business relations with you in connection with our business activity as well as to document events organized by Smurfit Westrock Polska.

You will always have the opportunity to stop receiving marketing communications (to withdraw the previously given consent or to object to your data being processed for marketing purposes).

WEBSITE USERS

If you visit our Website we may process your Personal Data for the following purposes:

- To maintain, improve, test and monitor the effectiveness of the Website;
- To monitor metrics such as total number of visitors, traffic data and demographic patterns;
- To ensure content on the website is presented in the most effective manner for you and to enhance your use of the website;
- To notify you of any changes to the Website and/or our services,
- To exchange correspondence/reply to queries sent via the "Contact us" form,
- To send you marketing materials, newsletters and other information.

We process this personal information based on our legitimate interest in ensuring that the Website is operating smoothly and in order to analyse which content is of most interest to visitors. This helps us to keep the Website available at all times and to improve your experience when you visit the Website. The legal basis of our legitimate interest is also used to reply to you/engage in correspondence with you concerning your queries sent to us via the "Contact us" form, in accordance with your expectations. Sending you marketing materials, newsletters and other information will be based on your consent / consent.

Meta Pixel

In order to display ads to the right audience, increase sales and measure ad performance, we use the Meta Pixel on some pages.

The Meta pixel is provided by Meta Platforms Ireland Limited (hereinafter referred to as Meta), which is jointly responsible with Smurfit Westrock Polska sp. z o.o. in accordance with Art. 26 GDPR. Smurfit Westrock Polska and Meta have accepted the Controller Addendum, available at https://www.facebook.com/legal/controller_addendum, to define their respective responsibilities for ensuring compliance with GDPR obligations due to joint data processing. By clicking the above link you can also read the content of the contract between Meta and Smurfit Westrock Polska which is the site operator. The above attachment should be understood as an agreement in accordance with Art. 26 of the GDPR between Meta and Smurfit Westrock Polska as the provider of the website using the Meta Pixel, who are jointly responsible.

Smurfit Westrock Polska has agreed with Meta that Smurfit Westrock Polska is responsible for providing you with this information and that Meta is responsible for ensuring the exercise of the rights of data subjects in accordance with Art. 15-20 GDPR concerning personal data stored by Meta after joint processing. Our use of Meta Pixel data and the purposes for which personal data are collected and transferred as part of joint data processing are in accordance with the Regulations available at <https://www.facebook.com/legal/terms/businessstools/>. Additional information on how Meta processes Personal Data, the legal basis and how to exercise the rights of data subjects, and information required by art. 13 section 1 lit. (a) and (b) of the GDPR regarding data processing by Meta can be found in the Meta Data Policy at <https://www.facebook.com/about/privacy>.

Please contact Meta directly with any questions regarding information rights, correction, deletion, data transfer and the right to object. If we receive such requests, we will pass them on. In this context, we would like to point out that despite joint responsibility under Art. 26 of the GDPR, as the provider of websites using the Meta Pixel, we do not influence the collection and processing of statistical data. Meta is solely responsible for such actions.

In relation to Meta services, data may be transferred outside the European Economic Area (EEA). The transfer of data outside the EEA has been secured by standard contractual clauses approved by the European Commission. Additional information is available at <https://www.facebook.com/help/566994660333381>.

The Meta pixel uses cookies and similar technologies. Additional information is available in the [Cookies Policy](#)

Google (Ads Customer Match, Google Analytics, Google Tag Manager, Google Optimize)

The website utilizes the services of Ads Customer Match, Google Analytics, Google Tag Manager, Google Optimize developed and provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter referred to as Google).

Google uses the information collected by these services to evaluate the use of our Services and to provide information about traffic on our Services. Additional information can be found at <https://policies.google.com/terms> and <https://policies.google.com/>.

We utilize the above services to analyze data collected through Google advertising tools, for statistical purposes only. Users can disable these settings using the Ads Preferences Manager available at <https://adssettings.google.pl/>.

We also use the data to advertise the website in Google search results and on the websites of other entities.

Additional information on the terms of cooperation between Google and Smurfit Westrock Polska for the above services is available at <https://privacy.google.com/businesses/processorterms/>

The above services use cookies and similar technologies as described in the Cookies Policy. As part of this process, Google obtains information about personal data, such as the IP address of the Website user, which is used by Google, among others, to track clicks and pages from which visitors came to the website, which then enables the preparation of relevant analyses.

Cookies and similar technologies are used to store personal data, such as the time of access, the location from which access was obtained and the frequency of visits by the Website user to a specific website. Each time a user visits our website, this personal data, including the IP address of the Internet connection used by the person concerned, is transmitted to Google in the USA. Google may disclose this data to third parties.

The Website User may prevent the collection of data generated by the above services. For this, he needs to download and install the browser add-on from the link <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google systems via JavaScript technology that no data and information about website visits should be sent to Google Analytics. The installation of the browser add-on is considered by Google as an objection to data collection.

Google LLC processes personal data in the United States. The transfer of data outside the European Economic Area (EEA) has been secured by standard contractual clauses approved by the European Commission. Additional information is available at <https://policies.google.com/privacy/frameworks>.

SOCIAL MEDIA USERS

If you visit our social media accounts, we may process your Personal Data for the following purposes:

- For the purpose of understanding our audience's demographic, preferences and interests, and being able to provide our audience with more relevant information and news via our social media accounts (profiling)
- For the purpose of optimizing our audience and targeting,
- For other purposes related to the content of the received comment or message, in particular to provide explanations and answer questions.
- To establish, investigate or defend against claims.

- For marketing purposes, in particular to advertise additional services offered by Smurfit Westrock Polska to inform about competitions and events.

We process such personal information based on our legitimate interest.

Information on data processing in connection with the fanpage on Facebook and communication via Messenger

- Smurfit Westrock Polska is the data controller of data processed in connection with running the Fanpage on Facebook.
- When running a Fanpage, Smurfit Westrock Polska uses data provided by Meta Platforms Ireland Limited (hereinafter referred to as Meta) such as the total number of page views, user actions, post actions, video views, post reach, comments, shares, replies, geographical areas such as city and country, language, number of likes. Meta collects and shares this data with the data controller.
- Meta Platforms Ireland Limited is jointly responsible with Smurfit Westrock Polska according to Art. 26 GDPR. In connection with the collection of statistical data by Meta, Meta has committed itself to accepting responsibility for the collection of statistical data following data protection laws. The same applies to ensuring the security of this data. More information on this topic, as well as information on how to exercise the rights of data subjects, can be found on the Meta page, and relevant information on statistical data at the link: https://www.facebook.com/legal/terms/page_controller_addendum.
- Under the link above, you can also read the content of the agreement between Meta and Smurfit Westrock Polska. According to this agreement, if you have any questions regarding the rights to information, correction, deletion, data transfer and the right to object, please contact Meta directly. If we receive such requests, we will pass them on.
- Despite bearing joint responsibility under Art. 26 of the GDPR, administering Fanpage Smurfit Westrock Polska it does not influence the collection and processing of statistical data. Meta Platforms Ireland Limited is solely responsible for such activities.
- Regardless of the joint processing of data for statistical purposes, Meta is the data controller of the data processed for its purposes.
- Personal data processed on Facebook will be transferred to:
 - Meta Platforms Ireland Limited,
 - Fanpage users,
 - entities authorized to receive them under the law.
- Data processed on Facebook will be processed for the duration of running the Fanpage.
- Data processed on Facebook will be transferred outside the European Economic Area in accordance with the information available at https://www.facebook.com/help/566994660333381/?helpref=uf_share.

Information on data processing in connection with running a page on LinkedIn

- Smurfit Westrock Polska is the controller of data processed in relation to running the page on LinkedIn.
- Running the LinkedIn page, Smurfit Westrock Polska uses data provided by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA (hereinafter "LinkedIn"). LinkedIn processes information regarding interaction with the Site (e.g. whether the page is viewed or visited). In addition, LinkedIn processes the data entered by the User of the LinkedIn website in their profile, such as the scope of job duties, country, industry, hierarchy level, company size and employment status. This data is aggregated and provided to the company as statistical information to help them better understand the trends and demographics of people interacting with the LinkedIn Page. The aggregated statistical information provided to Smurfit Westrock Polska is not personally identifiable. For example, Statistical Information will tell the company that users from a certain country or industry are interested in a LinkedIn Page, but Smurfit Westrock Polska will not be able to identify those users. Regardless of the Statistical Information and following your privacy settings, other users will be able to know public posts or social actions (e.g. like or follow) undertaken by you on LinkedIn Pages.

- LinkedIn is jointly responsible with Smurfit Westrock Polska according to Art. 26 GDPR. More information on this subject, as well as information on how to exercise the rights of data subjects, can be found on the LinkedIn page at <https://www.linkedin.com/help/linkedin/answer/124838/joint-controllership?lang=pl>. Information on the possibility of exercising the rights of the website user is available at <https://www.linkedin.com/help/linkedin/answer/116277?lang=pl>. The content of the concluded agreement is available at <https://legal.linkedin.com/pages-joint-controller-addendum>
- Regardless of the joint processing of data for statistical purposes, LinkedIn is the data controller of the data processed for its purposes

Google Business Profile

- We run a Company Profile in the Google Business Profile, which allows you to add opinions about Smurfit Westrock Polska.
- The Controller of data processed in this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, following the information available at <https://policies.google.com/privacy>

EXISTING CUSTOMERS

If you are one of our existing customers, we may process your Personal Data for the following purposes:

- To conduct administrative, financial and operational processes;
- To review and respond to any correspondence or queries you send us;
- To monitor sales levels and review sales patterns;
- To conduct due diligence checks;
- To fulfil orders and comply with our obligations under any contract of sale we may have with you;
- To process any financial payments and manage your customer account;
- To enter into contractual relations (to conclude and perform contracts);
- To pursue or to defend against legal claims;
- To send you marketing information;
- To carry out customer satisfaction and other types of surveys;
- To document events organized by Smurfit Westrock Polska by taking photos or filming.

We process your Personal Data for the above purposes based on the following legal bases:

- our legitimate interest to ensure the operation of our business and the maintenance of our relationship with you;
- a necessity in order to enter into and perform a contract with you;
- our legitimate interest to pursue or to defend against legal claims;
- our legitimate interest to document events that we organize;
- a necessity to process your Personal Data in order to comply with a legal obligation under applicable Polish and European Union law to which we are subject;
- your consent to be subject to our marketing activities.

In the event that you do not wish to provide us with your Personal Data so that we can process it for the purposes outlined above, we will not be able to provide services or sell products to you.

POTENTIAL CUSTOMERS

If you are one of our potential customers, we may process your Personal Data for the following purposes:

- To develop and maintain our relationship with you;
- To manage and administer our relationships with potential customers;
- To prepare to enter into a contract;
- To document events organized by Smurfit Westrock Polska by taking photos or filming;
- To send you marketing information.

We process your Personal Data for the above purposes based on the following legal bases:

- our legitimate interest to develop and maintain our relationship with you;
- our legitimate interest to document events that we organize;
- the necessity to undertake actions before entering into contract with you upon your request;
- your consent to be subject to our marketing activities.

EXISTING CONTRACTORS OTHER THAN CUSTOMERS

If you are one of our existing contractors other than customers, we process your Personal Data for the following purposes:

- To enter into contractual relations (to conclude and perform contracts);
- To conduct administrative, financial and operational processes;
- To review and respond to any correspondence or queries you send us;
- To conduct due diligence checks;
- To process any financial payments;
- To pursue or to defend against legal claims;
- To comply with applicable Polish and European Union company law

We process your Personal Data for the above purposes based on the following legal bases:

- our legitimate interest to ensure the operation of our business;
- a necessity in order to enter into and perform a contract with you;
- our legitimate interest to pursue or to defend against legal claims;
- a necessity to process your Personal Data in order to comply with a legal obligation under applicable Polish and European Union law to which we are subject.

In the event that you do not wish to provide us with your Personal Data so that we can process it for the purposes outlined above, we will not be able to conclude contracts with you and you will not be able to provide us with services.

POTENTIAL CONTRACTORS OTHER THAN CUSTOMERS

If you are one of our potential contractors other than customers, we may process your Personal Data for the following purposes:

- To develop and maintain our relationship with you;
- To manage and administer our relationships with potential contractors other than customers;
- To prepare to enter into a contract.

We process your Personal Data for the above purposes based on the following legal bases:

- our legitimate interest to develop and maintain our relationship with you;
- the necessity to undertake actions before entering into contract with you upon your request.

PERSONS AUTHORIZED TO REPRESENT

If you are a person authorized to represent, we may process your Personal Data for the following purposes:

- To verify the persons authorized to represent;
- To pursue or to defend against legal claims;

We process your Personal Data for the above purposes based on the following legal bases:

- our legitimate interest in being able to verify the persons authorized to represent;
- our legitimate interest to pursue or to defend against legal claims.

Where required by applicable data privacy laws, we will only use your Personal Data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for any other reasonable purposes in connection with our engagement with you, the purpose and legal basis for any other further processing will be notified in advance from time to time.

Where we rely on a legitimate purpose of Smurfit Westrock Polska or a third-party recipient of the personal data in order to use and disclose personal data, you are entitled to object to such use or disclosure and if you do, we will stop processing your personal data for that purpose unless we can show there are compelling legitimate reasons for us to continue to do so.

5. How We Share Your Personal Data

Depending on your relationship with us, we may disclose some or all of your Personal Data to service providers and other parties listed in this section.

Service Providers and Affiliates

We will share Personal Data with our service providers and affiliates so that they can provide services to us. Our service providers help us to provide for example the website, support or marketing and PR services to you. We carefully select our service providers and we take corresponding measures to protect your Personal Data when service providers are engaged.

Legal Obligations

We may share any Personal Data where this is required by law or regulation, or court or administrative order having force of law, or where required by any of Smurfit Westrock's regulators.

Business Transfers

Your Personal Data may be transferred to a different entity, and our legal and other advisors, if we undergo, or evaluate, a merger, acquisition, bankruptcy or other transaction (or proposed transaction) in which that entity assumes control of our business or assets of our business (in whole or in part).

6. Transfers of Personal Data

Because of the global nature of our business, your Personal Data may be transferred to Smurfit Westrock Group companies, subcontractors and partners located in countries across the world. We will

always take steps to ensure that any international transfer of Personal Data is carefully managed to protect your rights and interests.

Some transfers may be outside of the European Economic Area ("EEA") to countries which do not have equivalent protections, and for those transfers Smurfit Westrock's policy is that (i) they do not occur without prior written authority; and (b) that an appropriate transfer mechanism is implemented to protect your Personal Data. We implement the standard contractual clauses to cover transfers of your personal data to our affiliates and vendors outside the EEA.

You have the right to ask us for more information about the safeguards we have put in place (including a copy of the transfer mechanism as mentioned above. Contact us if you would like to receive further information or to request a copy of the relevant safeguard (which may be redacted to ensure confidentiality).

7. Data Security and Retention

We seek to protect your Personal Data from unauthorised access, use and disclosure using appropriate physical, technical and organisation security measures based on the type of Personal Data and how we are processing that Personal Data.

In general, as far as Personal Data of business and marketing contacts is concerned, it is kept while we maintain ongoing relationship with them or until their consent is withdrawn or an objection is made. Once we have determined that we no longer need to hold this data, we will delete it.

As far as Personal Data of Website Users' is concerned, it is kept for the period of 12 months since their last visit on our website.

As far as Personal Data Social Media Users' is concerned, it is kept for the period of 12 months since their last publication on social media.

As far as Personal Data of our existing customers is concerned, it is kept for the term of our contract and subsequently for the period required by the legal regulations related to tax and accounting. In the case of processing your Personal Data based on your consent or our legitimate interest, it will be kept until you have withdrawn your consent/objected to processing, no longer however that is necessary for the purposes for which the Personal Data is processed.

As far as Personal Data of potential customers is concerned, it is kept while we maintain relationship or until you have withdrawn your consent/objected to processing.

As far as Personal Data of our existing contractors other than customers is concerned, it is kept for the term of our contract and subsequently for the period required by the legal regulations related to tax and accounting. In the case of processing your Personal Data based on our legitimate interest, it will be kept until you have objected to processing, no longer however that is necessary for the purposes for which the Personal Data is processed.

As far as Personal Data of potential contractors other than customers is concerned, it is kept while we maintain relationship or until you have objected to processing.

As far as Personal Data of persons authorized to represent is concerned, it is kept for the term of our contract or until you have objected to processing.

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are making a claim or defending against one or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data.

8. Your Rights in relation to Personal Data

Under applicable privacy laws, you may have rights over your Personal Data as a data subject.

For further information on whether you can exercise any of the rights below in your jurisdiction, please contact us at: grouplegal@smurfitwestrock.com. We have set out in this section certain data subject rights under GDPR, which apply to clients based in the EEA.

- **Request access** to your Personal Data. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).
- **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) in particular there is something about your particular situation, which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your Personal Data to another party.
- **Withdraw your consent** at any time if your Personal Data is processed on the basis of consent. If you withdraw your consent, this will not affect the lawfulness of how we used your Personal Data before you withdrew consent.

Lodge a complaint with a competent supervisory authority if you consider that the processing of your Personal Data infringes applicable law. We request that you contact us in the first instance so that we can respond to your complaint. The contact details are available here: https://edpb.europa.eu/about-edpb/about-edpb/members_en (Smurfit Westrock Group) or please contact us by using details below (Smurfit Westrock Polska).

You can request to exercise the rights above by contacting us using the details below. Your rights will in each case be subject to the restrictions set out in applicable data protection laws. Further information on these rights, and the circumstances in which they may arise in connection with our processing of your Personal Data, can be obtained by contacting our Data Protection Representative in writing to Group Legal Department, Smurfit Westrock Group, Beech Hill Drive, Clonskeagh, Dublin 4, Ireland (Smurfit Westrock Group) or with GDPR Team by contacting us using details below (Smurfit Westrock Polska).

9. Changes to this Privacy Notice

We constantly try to improve our services, so we may need to change this Privacy Notice from time to time to reflect changes in technology, law, business operations or any other reason we determine is necessary or appropriate.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail or post, and you will have a choice as to whether or not we use your Personal Data in the new manner.

10. Contact Information

If you have any questions or queries about this Privacy Notice, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

Smurfit Westrock Group:

- ii. Phone: +353 1 202 7000
- iii. Email: grouplegal@smurfitwestrock.com
- iv. Address: Group Legal Department, Smurfit Westrock Group, Beech Hill Drive, Clonskeagh, Dublin 4, Ireland

Smurfit Westrock Polska:

- i. Email: daneosobowe.poland@smurfitwestrock.pl
- ii. Address: GDPR Team, Smurfit Westrock Polska sp. z o.o. Warszawa (03-163), ul. Klasyków 36.

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