

QUADPACK PRIVACY POLICY

1. Processing of Personal Data

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter, "GDPR"), we would like to inform you that all the personal data that the User provides through the Website www.quadpack.com (hereinafter, the "Website") will be added to and processed in the filing system owned by the company QUADPACK INDUSTRIES, S.A., (hereinafter, "QUADPACK") with the sole purpose of being able to reply to your requests and to keep you informed, including by electronic means, about our products and services.

The completion of all data requested through the Website is necessary to provide the services made available to the User in an optimal manner. Failure to provide all the information required by QUADPACK does not guarantee that the information and services offered can be provided, are provided correctly or are tailored to the needs of the User.

2. Basic Information about the Protection of Personal Data

Basic Information about Data Protection	
Controller	QUADPACK INDUSTRIES, S.A.
Aim	Manage the reception of inquiries for QUADPACK products/services and, where appropriate, the sending of information and market research.
Legitimacy	Data subject consent
Recipients	Data will be passed on to the various subsidiaries that make up the Quadpack Group.
Rights	Access, rectification, cancellation, objection, restriction of processing, portability of data and not to be the object of individualised automated decisions.
Detailed information	You can find detailed information on the protection of your data below.





3. Detailed Information about the Protection of Personal Data

3.1. Data Controller

The Data Controller responsible for processing the User's data is the company QUADPACK INDUSTRIES, S.A, with address at Plaça Europa 9-11, planta 11, 08908, (Barcelona), Spain, with C.I.F. (Código de identificación fiscal [Tax ID Number]) A-65361388, phone number +34934450643 and email address dataprotection@quadpack.com.

3.2. Aims of the Data Processing

The User may voluntarily provide us with personal information, either through certain data collection forms included in the different sections of the website, the App, through the email addresses provided by the User for this purpose and, where appropriate, through the means used by the User to communicate with QUADPACK due to the commercial relationship. The provision of any personal data through the various forms and email addresses on this website implies acceptance and consent to the processing of the same in accordance with the terms indicated in this privacy policy.

Access by QUADPACK to the User's personal data is actioned solely and exclusively for the purpose of QUADPACK being able to respond to the User's requests and to keep the User informed, including by electronic means, about our products and services, without being able to apply or use them for any other purpose. The consent, satisfies the following aims:

- a) To provide the services arising from the commercial agreement signed by the User and QUADPACK or arising from their commercial relationship.
- b) Management of the services arising from the commercial relationship or services agreement signed by both parties.
- c) To be able to contact the User and manage basic administration tasks;
- d) Respond to and properly manage queries, comments, incidents or suggestions submitted;
- e) Respond to and properly manage requests for quotations sent to us through this medium;
- f) Keep you informed, either by electronic means or mobile devices (push notifications), or by any other means so provided and facilitated, of personalised offers and discounts from QUADPACK that may be of interest to you; as well as to inform you about the exhibitions and promotion of new products.
- g) Provide additional services, improvements in our services and in the customer experience when using our Website or App.
- h) Statistical analysis of our Newsletter, visits to our Website/App and the behaviour of Users on the same to improve the communications made by QUADPACK to the User. Properly manage navigation through this Website/App.
- i) A "commercial profile" may also be drawn up on the basis of the information provided. No automated decisions will be made based on this profile.





With regard to the processing of your data for promotional or advertising purposes, the data subject will be provided, together with the corresponding data collection form, with the appropriate procedure, simple and free of charge, so that the User can freely give his/her consent to this effect. The consent given can be revoked at any time and at no cost to the data subject.

3.2.1. Storage of the Data

The personal data provided will be kept by QUADPACK for as long as there is a contractual and/or commercial relationship with the User and for as long as the User does not exercise the right to delete, cancel and/or restriction of processing of the personal data or, where applicable, for the maximum legal period permitted by data protection legislation, including the statute of limitations for possible liability arising from the contractual relationship.

In these cases, QUADPACK will keep the data duly blocked, without making any use of it, as long as it may be necessary for the exercise or defence of claims or may derive any type of legal, contractual or legal liability from the data processing, which must be attended to and for which its recovery is necessary.

3.2.2. Minors under the age of 18.

This QUADPACK Website/App is not intended for minors under the age of 18. In any case, children under the age of 16 should not submit any personal information without the consent of their parent or guardian. QUADPACK is not responsible for any personal information submitted by children under the age of 16 without proper authorisation.

3.3. Legitimacy of the Data Processing

The legal basis for the processing of the User's data is the processing of the User's requests and the ability to keep the User informed, including by electronic means, about our products and services, to provide the services arising from the commercial agreement or the commercial relationship maintained between the parties.

Furthermore, this purpose is not subject to the consent for data that are not necessary for this purpose.

3.4. Recipients

The User expressly authorises QUADPACK to transfer his/her data to the various subsidiaries of the Quadpack Group in order to carry out the purposes set out in this privacy policy. In the event that the User provides QUADPACK with third party personal data, the User declares that said data are true and that he/she requested the consent of these third parties, whose data he/she provides us with, and that they were informed that their personal data will be processed by





QUADPACK in the same terms as the User has been informed and given his/her consent in this privacy policy.

3.5. Exercising Rights

The User may exercise the following rights, provided for in the GDPR, in relation to the processing of his/her personal data:

- Right to request access to personal data relating to the data subject.
- Right to request rectification or deletion.
- Right to request restriction of its processing,
- Right to object to processing.
- Right to data portability.
- The right not to be subject to automated individualised decisions.

Said rights may be exercised by written communication addressed to QUADPACK INDUSTRIES, S.A, with address at Plaça Europa 9-11, planta 11, 08908, (Barcelona), Spain, with Company Tax ID Number A-65361388, phone number +34934450643 and email dataprotection@quadpack.com.

In both cases, the data subject User must attach a copy of his/her national identity card, passport or other valid document that identifies him/her. The communication must be made immediately and in no case later than the working day following receipt of the request, together, where appropriate, with other information that may be relevant to the resolution of the request.

3.6. Security Measures and Levels

QUADPACK has adopted the necessary measures to maintain the required level of security, depending on the nature of the personal data processed and the circumstances of the processing, in order to prevent, as far as possible and always in accordance with the method, the alteration, loss, unauthorised processing of or access to said data.

QUADPACK also ensures that it has implemented mechanisms to:

- 1. Ensure the continued confidentiality, integrity, availability and resilience of processing systems and services.
- 2. Restore availability and access to personal data quickly in the event of a physical or technical incident.
- 3. Verify, evaluate and assess, on a regular basis, the effectiveness of the technical and organisational measures implemented to guarantee the security of the processing.
- 4. Pseudonymise and encrypt personal data, if applicable.

Quadpack Helping beauty brands perform



3.7. Scope of Application

The structure of files, equipment and information systems in order to comply with current legislation on data protection, will apply to all files, temporary or permanent, owned by QUADPACK containing personal data, as well as any equipment or information system that processes them.

3.8. User Consent

The User declares to have read and expressly accepted this Privacy Policy when registering with QUADPACK, giving his/her unequivocal and express consent to QUADPACK, to the data processing in accordance with the purposes and services reflected herein.

3.9. Commercial and Promotional Information

The personal data you provide us with through the QUADPACK website form, will be processed by <u>WEBPAC</u>, for the only purpose of notifying you of QUADPACK's business and commercial communications content, Newsletters and promotions that we consider may be of interest to you, by email or by any other means of electronic communication agreed.

3.10. Confidentiality and Professional Secrecy

The data collected in all private communications between QUADPACK and its clients or Users will be treated with absolute confidentiality, and QUADPACK is committed to the obligation of secrecy of personal data, to its duty to keep them and to adopt all necessary measures to prevent their alteration, loss and unauthorised processing or access, in accordance with the applicable data protection regulations.

In addition, information of any kind that the parties exchange with each other, information that they agree is of such a nature, or information that they simply see in the content of such information, shall also be deemed to be confidential. The visualisation of data through the Internet will not imply direct access to them, except with the express consent of the owner for each occasion.

3.11. Changes in the Security and Data Protection Policy

QUADPACK reserves the right to modify its security and data protection policy in order to adapt it to new legislation or case law, as well as those that may derive from existing codes of conduct on the subject, or by strategic corporate decisions, with effect from the date of publication of said modification on QUADPACK's website.





4. Data Communicated by the User

Before providing personal data relating to third parties on our Website, the User must obtain their prior and express consent, having informed them of the terms contained in this Privacy Policy. The User undertakes to hold QUADPACK harmless from any possible claim, fine or sanction it may be obliged to bear as a result of the User's failure to comply with the duty described in this paragraph.

5. Cookies.

Access to this website may involve the use of cookies. Cookies are small amounts of information that are stored in each User's browser so that the server can remember certain information that may later be used. This information allows to identify you as a specific User and allows you to save your personal preferences, as well as technical information such as visits or specific pages you visit.

Those Users who do not wish to receive cookies or wish to be informed before cookies are stored on their computer can configure their browser for this purpose. For more information, please refer to our "Cookie Policy".