

GDPR

DISCLOSURE REQUIREMENT

(Version 0 of 14 December 2018)

Following the application as of 25 May 2018 of the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, hereinafter referred to as the GDPR, we inform you that:

1. The controller of personal data shall be **MMP Neupack Polska sp. z o.o.** with registered office in Bydgoszcz, Poland, at ul. Równa 2, National Court Register entry No. KRS 200265, Tax Id. No. (NIP) 5321857333.
2. The controller can be contacted at the address specified above, by e-mail at the address: neupack.polska@mm-packaging.com and by phone at 52 36-04-64652 36-04-616.
3. The controller has appointed a data protection officer, Thomas Balzer, PhD, who can be contacted in any personal data protection issues at the e-mail address: dataprivacy@mayr-melnhof.com, by phone at 43 50136-0 or in person at the controller's registered office. To facilitate contact, it is also possible to directly contact a personal data protection specialist at the e-mail address: ochronadanych@mm-packaging.com or in person at the controller's registered office.
4. We process your personal data:
 - a. to carry out activities aimed at concluding a contract, such as making an offer, exchanging correspondence to agree contract terms, etc. (legal basis: Art. 6.1.b) of the GDPR);
 - b. to perform contracts concluded with us, which means, among other things, contact by phone and e-mail, dispatch of products ordered, etc. (legal basis: Art. 6.1.b) of the GDPR);
 - c. to fulfil our legal obligations, e.g. to issue an invoice, to reply to a complaint, to store accounting documents, etc.;
 - d. to directly offer products and services (direct marketing), including to match them with your preferences (legal basis: Art. 6.1.f of the GDPR);
 - e. to directly offer (direct marketing) products and services of the companies that co-operate with us (our partners), which represents the pursuit of our and our partners' legitimate interests (legal basis: Art. 6.1.f of the GDPR);
 - f. to analyse customer satisfaction, which represents the pursuit of our legitimate interest consisting in the determination of a service quality and a customer satisfaction level as regards the products and services on offer (legal basis: Art. 6.1.f of the GDPR);
 - g. for internal administrative purposes, including for analytical and statistical purposes (to better customise the services, for the general optimisation of the services, for the optimisation of service processes, to gather information on the clients, for financial analysis purposes, etc.), which represents the pursuit of our legitimate interest (legal basis: Art. 6.1.f of the GDPR);
 - h. to potentially determine, pursue and defend against claims, which represents the pursuit of our legitimate interest, e.g. to send payment requests or to claim payment in court (legal basis: Art. 6.1.f of the GDPR);
 - i. for archiving (evidence) purposes, which represents the pursuit of our legitimate interest consisting in the safeguarding of information should a legal need arise to demonstrate facts (legal basis: Art. 6.1.f of the GDPR).
5. Your personal data will be processed for a period necessary for the attainment of the processing purposes, listed in section 4:
 - a. in reference to the conclusion and performance of a contract and to the determination of or defence against claims – until the contract performance is completed, and upon the lapse of this term – for a period prescribed by law or to protect any potential claims (i.e. for the longest possible limitation period concerning the claims under the contract plus one year as of the end of a year when the contract expires) – the additional period of one year is introduced

should any claims be reported directly before the lapse of the limitation period and in order to align a date for the data erasure for the contracts that expire in the given year;

- b. if no contract is concluded based on an offer submitted to you within six months, the personal data related to such an offer shall be promptly removed, except for the data required to carry out the direct marketing activities;
 - c. in reference to the data processed in order to fulfil the legal obligations – for the period specified in relevant provisions of law that require of us to store the data; in any case not shorter than for the period during which we might bear legal consequences of failing to meet any legal obligation;
 - d. in reference to the data processed for direct marketing purposes – until an objection is raised against the processing of the data for such purposes or until the data are determined to have become obsolete;
 - e. in reference to the internal administrative purposes, the archiving purposes and as regards analysing customer satisfaction – until our legitimate interests that serve as a basis for the processing of the data are satisfied or until you object to such processing.
6. If the data are processed based on your consent, you have the right to withdraw the consent at any time; nonetheless, the data processing prior to the withdrawal of the consent remains lawful. The consent may be withdrawn by phone, e-mail or post at the addresses specified in section 2.
7. You have the right to object to the processing of your data for the purposes specified in section 4.e-i at any time; we shall discontinue processing your data for such purposes, unless we are able to demonstrate that in reference to your data there exist material legitimate grounds that take precedence over your interests, rights and freedoms, e.g. we will need your data to potentially determine, pursue or defend against any claims.
8. At any time you have the right to object to the processing of your data for direct marketing purposes (section 4.d-e). If you exercise this right, we shall discontinue processing the data for this purpose.
9. In connection with our processing of your personal data, you have the right to:
 - a) access the data, and receive a copy thereof,
 - b) **data rectification,**
 - c) data erasure (the 'right to be forgotten') in the cases specified in Art. 17 of the GDPR,
 - d) restriction of processing,
 - e) object to the processing of the data,
 - f) data transferability.
10. Your personal data may be disclosed:

Your personal data may also be accessed by our subcontractors (processors), e.g. entities that maintain our IT systems, entities that service and maintain our IT infrastructure, entities that provide us with advisory, consulting, legal, tax or accounting services, etc., postal service operators, courier service companies or banks.
11. If you believe that we process your data in breach of the GDPR, you have the right to file a complaint with a supervisory authority, i.e. the President of the Personal Data Protection Office.
12. Depending on the nature and context, the provision of your personal data may be obligatory. The data are provided on a voluntary basis, but certain activities, including the provision of the services and/or the performance of the contracts, may involve the necessity to provide the required data to the extent necessary to perform the contract or fulfil the legal obligations.