

# On-Line Privacy Policy

Signode Industrial Group / Strapex ("SIG/Strapex", "we" or "us") is committed to protecting and respecting your privacy.

This Policy (together with other documents referred to herein) describes what personal data we collect from you and how we process your personal data.

If you provide us with the personal data of other persons (e.g. family members, data of work colleagues) please make sure that these persons are aware of this privacy policy and only share their personal data with us and only share their personal data with us if you are authorized to do so and if their personal data is accurate.

If you do not wish to accept this Policy please do not continue to use the Website.

This policy is subject to Swiss Law. Where applicable, the European Union ("EU") provisions, in particular the General Data Protection Regulation (GDPR), are taken into account.

Responsible for the processing of your personal data according to Art. 4(7) EU GDPR and Art. 5 Letter j of the new Swiss FADP is: [sse.orgapack@sigpse.com](mailto:sse.orgapack@sigpse.com)

## 1. Personal data we may collect from you

- We may collect information on your visits to the Website including, but not limited to, traffic data, location data, weblogs, content from surveys, competitions, contact forms and other communication data and the resources that you access. This information, for example, will make your visit to the Website easier in the future since we might suggest Content depending on the location you access the Website from.
- If you use our contact forms (for example "Contact", "Send us a Message", or "Contact us about working together" or similar), please notice that fields marked with an asterisk (\*) are mandatory fields. We need this information to comply with your request. Other information or personal data you share with us is at your sole discretion. If you contact us, we may keep a record of that correspondence.
- We also collect information of all users of the Website in aggregated form in order to provide us with a better understanding of the users of the Website as a group.
- We may also use the information for direct marketing via e-mail, when you opt-in for this purpose in the relevant contact form. You may opt-out of receiving future marketing communication, at your discretion, at any time.
- We may also store cookies as set out in more detail in our Cookies Policy site.

## 2. How we use your information

All this information ("your data") will be collected and handled by us for the following purposes:

- To best tailor Content and resources according to your preferences.
- To respond to your request or questions when you are contacting us. We will provide you the relevant information by email. Telephone and/or mail can be an option if you provide these details, but it is in our sole discretion to choose the communication system.
- To deliver other information – such as SIG upcoming events or newsletters – that we may offer you.
- To help us create, publish, and improve Content most relevant to you.
- To ensure that the Content provided through the Website are presented in the most effective manner for you and for your device.
- To allow you to participate in interactive features of our Website, when you choose to do so.
- To further develop and improve the Website and systems to better serve you.

If you have given us your consent to process your personal data for certain purposes (for example when registering to receive newsletters), we will process your personal data within the scope of and based on this consent, unless we have another legal basis, provided that we require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

### **3. Sharing with third parties**

In the context of our business activities and in line with the purpose of the data processing set out above, it may sometimes be necessary for us to disclose your information to third parties, insofar as such a transfer is permitted. However, this disclosure will only occur in the following circumstances:

- To suppliers, contractors and agents: From time to time we may engage or employ other companies and individuals to perform functions on our behalf. Examples may include the hosting of Website content, or the provision of certain features contained on the Website or to provide financial updates upon your request. Such recipients will only have access to data required by them to perform their functions, and are not permitted to use such data for any other purposes. These recipients are subject to contractual confidentiality obligations.
- To other entities belonging to SIG (i.e. any companies directly or indirectly controlled by SIG), including their suppliers, contractors and agents, which may be involved in the provision of the Website or the content, so that we can better serve or respond to your requests (e.g. when you use 'contact us' forms). By providing us with your data, you consent that your data may be transferred to, processed and stored outside of your country of residence, including in countries which may not provide adequate data protection as defined by EU data protection law, but only for the limited purposes and in accordance with the principles set out herein.
- To government or law enforcement authorities if we determine in our sole discretion that we are under an obligation to do so.

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data protection. For this purpose, we work with certified organisations under Swiss-U.S. DPF and/or use the revised European Commission's standard contractual clauses, which can be accessed here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?)

### **4. Duration of personal data storage**

We process and store your personal data for as long as is necessary for the fulfilment of our contractual and legal obligations or otherwise for the purposes pursued with the processing, i.e. for the duration of the entire business relationship (from the initiation processing to the termination of a contract) and beyond that in accordance with the applicable statutory storage and documentation obligations. As soon as your personal data is no longer required for the above-mentioned purposes, it will be deleted or anonymised as far as possible.

### **5. IP addresses and cookies**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is mainly statistical data about our users' browsing actions and patterns.

For the same reason, we may obtain information about your general Internet usage by using a cookie file which is stored on your device. Cookies help us to improve the Website and to deliver a better and more personalised content.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the storing of cookies. This will remove all details from the cookie. However, if you select this setting you may be unable to access certain parts of the Website or use certain functionality. Unless you have adjusted your browser settings so that it will refuse cookies, our systems will issue cookies each time you access the Website. Please note that our suppliers of third party features may also use cookies, over which we have no control. Consequently, we suggest you check the websites of any such third parties and their privacy policies for more information about their cookies and how you can manage them.

If your computer is shared by other people, we advise that you do not select the 'remember my details' option if the Website offers such option to store certain information entered by you.

For further information pertaining to the usage of cookies on the Website please refer to our Cookies Policy.

## **6. Where your personal data is stored and processed**

The data that we collect from you will be transferred to, processed and stored by us, other SIG companies and the third parties including external service providers mentioned above outside your country of residence and/or the EU, including in countries which may not provide adequate data protection as defined by EU data protection law.

By submitting your personal data, you agree to such transfer, storing and processing outside of EU. We endeavour to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

## **7. Data Security**

We take appropriate technical and organisational security precautions to protect your personal data from unauthorised access and misuse, such as such as issuance of internal directives, access controls and restrictions, encryption etc...

Although we will do our best to protect your data, you should be aware that the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your data transmitted to the Website or any third party, for this reason, any transmission is at your own risk. Once we have received your data and transferred it to a third party, we will use strict operational procedures and reasonable security measures to prevent any unauthorized access, change, deletion or transmission of this data.

## **8. Your rights - How you can access, correct and delete your data**

Within the scope of the applicable data protection law and to the extent required by the law (e.g. in the case of the GDPR), you have the right to information, amendment, deletion, the right to restrict the processing of data and otherwise to refuse permission to our processing of the data as well as the publication of certain personal data for the purpose of transfer to another office (known as data portability). Please note, however, that we reserve the right to enforce the restrictions required by law, for example in cases where we are obliged to store or process certain data, have an overriding interest to do so (to the extent that we may call on it) or require it to assert claims. We will inform you in advance if this incurs any costs for you. Please note that exercising your rights can conflict with contractual agreements, which can have consequences, such as the premature termination of a contract or incurred costs. In such cases, we will inform you in advance where this is not already contractually or legally regulated

In general, exercising these rights requires that you are able to prove your identity (e.g., by a copy of identification documents where your identity is not evident otherwise or can be verified in another way)

You may contact us to request any of the above right relating to your personal data by emailing us at [privacy@signode.com](mailto:privacy@signode.com). We will store personal data only for technical reasons or as long as legitimately required by the business.

If the EU GDPR is applicable, you have the right to lodge a complaint with the competent data protection supervisory authority pursuant to Art. 77 EU GDPR. Where the Swiss FADP is applicable, you can lodge a report with the Swiss Federal Data Protection and Information Commissioner (EDÖB). The link to file a report can be found here:

[https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt/anzeigeformular\\_betroffene.html](https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt/anzeigeformular_betroffene.html)

## **9. Marketing communications**

You have the right to opt-in / opt-out to receive marketing communications and news from us via email.

We will usually offer you a check box on the forms we use to collect your data where, if you agree for this purpose, you have to click up on the box. You can also exercise the opt-out right at any time by contacting us at [privacy@signode.com](mailto:privacy@signode.com) confirming all relevant details.

## **10. Changes to this Policy**

We may amend this Privacy Policy at any time without prior notice. The current version published on our website shall apply. If the privacy policy is part of an agreement with you, we will notify you of the changes made by e-mail or other suitable means

## **11. Contact**

Questions, comments and requests regarding this Policy are welcomed and should be addressed to [privacy@signode.com](mailto:privacy@signode.com).