Privacy Policy

This Privacy Policy governs your use of this website, located at www.graphicpkg.com, which is made available by Graphic Packaging Holding Company ("GPHC" or "we" or "us"). This Privacy Policy also applies to any social media pages offered by us through a third-party social sharing platform, which link to this Privacy Policy. Through your use or access of any of our websites that link to this Privacy Policy, you agree to be bound by the terms of this Privacy Policy, as they may be amended from time to time. We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. If it materially changes, we will notify our users by posting a notice of changes in a separate section of this Privacy Policy.

1. Personal Information We Collect and How We Use It. We collect and use your personal information for a variety of business purposes, including to provide the products, services and information that you request, to communicate with you about them, to do all things necessary to administer our products, services and websites, and manage, protect and improve them. We also use personal information to customize content most relevant to your interests and notify you about important news concerning GPHC and its affiliates. "Personal information" means information that may identify you as an individual or allow online contact with you.

We do not sell your personal information to third parties to enable them to market to you. To understand what personal information we may share with third parties, see "Information We Share with Third Parties" below.

- 2. Information We Receive From Third Parties. We may also receive information about you (including personal information) from third parties. For example, if you are on another website and you opt-in to receive information from us, that website will forward to us your email address and other information about you so that we may contact you as requested. You may also choose to participate in a third party application or feature (such as one of our pages on Facebook®, Twitter®, LinkedIn® or another social platform or website) through which you allow us to collect (or the third party to share) information about you, including personal information. In addition, we may receive information about you if other users of a third party website give us access to their profiles and you are one of their "connections" or information about you is otherwise accessible through your "connections" web page, profile page, or similar page on a social networking or other third party website or interactive service. We may combine the information we receive from these third parties with information we collect, in which case, we will apply this Privacy Policy to any personal information received, unless we have disclosed otherwise.
- 3. Other Information We Collect. Whenever you visit or interact with www.graphicpkg.com or a social media page we offer, we, or our service providers, may use assorted technologies that automatically or passively collect information about how a website is accessed and used. We refer to this information as traffic data. Traffic data may include, but is not limited to, browser type, device type used to access the

website (i.e., computer or mobile device), unique number assigned to identify such device, operating system, application version, click path taken through the website, website visited before or after our site, use of features or applications on the website, and other publicly available information. This information helps us improve our websites and marketing. Traffic data is generally non-identifying, but if we associate it with you as an identifiable person, we will treat it as personal information.

Technologies we use on our websites to collect traffic data, include but are not limited to: mobile analytics software, cookies (data files placed on your computer or other devices used to access a website), and pixel tags (transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a web page or in an email, which indicates that a page or email has been viewed). We, or our vendors, may also place cookies or similar files on your computer or other devices used to access one of our websites for security purposes, to facilitate navigation and to personalize your experience while visiting the website. A pixel tag may tell your browser to get content from another server. If you set your browser to disable or opt out of receiving cookies, please be aware that some features and services on our websites may not work as intended.

- 4. Do Not Track Requests; Third-Party Tracking. Unless your browser settings are configured to make your online activities and publicly available information about your online activities (such as traffic data described above under "Other Information We Collect") invisible to usage analytics tools, we do not presently have the capability to omit you from our analytics to the extent your browser only sends us a "do not track" message and does not otherwise screen you from tracking without action on our part. While we, or vendors on our behalf, may track the websites you visited before and after our websites as part of the traffic data described above for our internal business purposes, we do not authorize other third parties (e.g., advertisers) to do so, but it is nonetheless possible that third parties may do so for their own purposes with respect to which we may have no knowledge or control.
- 5. Information We Share with Third Parties. We may use third-party partners, affiliates and service providers to help operate www.graphicpkg.com and social media pages we offer, to provide the products, services and information that you request, to communicate with you about them, to do all things necessary to administer our products, services and websites, and manage, protect and improve them. We may share information we have about you with such third parties for such purposes. These third parties are not authorized by us to use any of your personal information except as needed for such purposes.

We may use a third-party service provider to collect resumes and job applicant information online from prospects for employment with us and our affiliates by asking you to link to such provider's website, in which case, if you choose to proceed to that website, in addition to disclosing personal information to us, you will be disclosing it to our service provider. Such personal information will be subject to the provider's privacy policy posted on its website in addition to this Privacy Policy.

We reserve the right to transfer any information we have about you in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization or liquidation of our business.

We reserve the right to disclose any information as needed if that information is requested by law enforcement agencies or if we are required to do so by applicable law.

If you access our websites using a mobile device, your request will be transmitted via your mobile carrier's network and your carrier may have access to it. Consult your carrier's privacy policy for additional information.

6. Use of Public Areas, Social Media. If you respond through a social sharing feature or public interactive area on one of our websites, you should be aware that any personal and other information you submit there can be read, collected, or used by other users of the website. We are not responsible for the information you choose to make public in such manner. You are encouraged to exercise caution when posting personal information about yourself in public areas.

You are responsible for using all public forums, including any of our websites accessed through a third-party social networking platform like Facebook, Twitter or LinkedIn, in a manner consistent with the privacy policy and other terms and conditions applicable to such platform.

- 7. Data Security. We strive to protect your personal information from unauthorized access, loss, misuse or alteration by using physical, electronic or procedural security measures appropriate to the sensitivity of the information in our control. Although guaranteed security does not exist on the Internet or offline, we make commercially reasonable efforts to handle such information consistent with this Privacy Policy and applicable laws.
- 8. Links. Our websites may link to third-party websites. We are not responsible for the privacy practices or content of other websites. We encourage you to read the privacy statements of any third-party websites you visit.
- 9. Children. Our websites are not intended for use by children in the United States under the age of 13, and we do not knowingly collect personal information from such children. If we learn that we have collected the personal information of such a child we will take steps to delete the information as soon as possible. Children under the age of majority in any non-U.S. jurisdiction should not provide any personal information without their parent's consent.

10. Notice to Non-U.S. Residents. GPHC is based in the United States. Personal information may be accessed by us or transferred to us in the United States or to our affiliates and service providers elsewhere in the world. If you are located outside of the United States, be advised that your information will be transferred to and used in the United States and that, by submitting personal information to us, you explicitly authorize its transfer to and use in the United States. We will protect the privacy and security of personal information according to this Privacy Policy regardless of where it is processed or stored.

Your California Privacy Rights. Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, what types of personal information the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information in the immediately preceding calendar year. To access this information, please contact us or mail at: Graphic Packaging Holding Company, Attention: Director of Communications.

Updated December 2018.