



Privacy Notice

1. WHO IS OUR DATA PROTECTION STATEMENT ADDRESSED TO?

This statement is addressed to all our suppliers, customers, former customers, prospects, as well as individuals who show interest in our products or services.

2. DATA CONTROLLER

The GlobalPack Solutions group consists of several companies, each of which is a separate legal entity. Certain services are centralized at group level. In this respect, your personal data is processed by the GlobalPack Solutions group, for each of the following companies:
No-Nail boxes S.A., All Pack Services S.A. and Walupack S.A.

To contact us: gdpr@nnb.lu.

As data controller of personal data within the meaning of European privacy protection regulations, GlobalPack Solutions Group determines the purposes and means of personal data processing.

Personal data includes all information relating to an identified natural person.

The processing of personal data includes any possible operation on such data, such as its collection, recording, use or storage.

GlobalPack Solutions Group processes your personal data for purposes exclusively related to its business activities, on the basis of several legal grounds, and ensures that only strictly necessary data is processed.

3. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS?

- Identification data: name, address, telephone number, email address, professional contact details
- Professional information: employment, power of representation
- Financial information: bank details
- Transaction data: transaction details
- Information transmitted e.g. by cookies and similar technologies on websites and in emails. We may also record information about you from third parties, for example information communicated by our distributors. We may use information provided by external partner to contact you for prospecting purposes.

When we contact you as part of a commercial action and you have not provided us with your personal information, you can always ask via which external partner we received your personal information.

- We also record the date on which personal data was communicated or on which certain adjustments were made to this data.

4. FOR WHAT PURPOSE DO WE USE YOUR PERSONAL DATA AND WHAT IS THE LEGAL BASIS FOR THIS PROCESSING?

With your authorization:

- When you ask us questions via our website.
- For sending newsletters to which you are subscribed or to manage your participation in our commercial actions or competitions.

You can withdraw your consent at any time (see below «Exercising your rights»)

In the context of executing your contract:

- For the monitoring and processing of your order.
- For the monitoring and processing of complaints and returns.
- For general customer management including accounting, dispute management and legal proceedings, debt recovery or transfer and the protection of our rights in general.



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When we have a legitimate interest, as part of our marketing activities in order to:

- Evaluate certain characteristics of the data subjects based on automatically processed personal data («profiling») in order to offer them personalized offers and advice or information about our products and services.
- Develop our business relationship with you.
- Improve our internal commercial organization and operational activities, particularly in terms of risk management.
- Use this information for market research purposes or for advertising reasons, provided that the data subjects have not objected to the use of their personal data for promotional purposes.

If one or more of our personal data processing operations require your prior consent, we will request it in due time.

To comply with legal obligations to which we are subject:

We are also subject to tax and accounting obligations requiring the retention and transmission of certain personal data to accounting and tax administrations.

5. CAN YOUR PERSONAL DATA BE TRANSFERRED TO THIRD PARTIES?

Your personal data may be disclosed to:

- competent authorities, courts, public administrations;
- auditors, legal advisors;
- our subcontractors in the context of services performed on our behalf (example: IT service providers (website hosting, accounting software, database management system, etc.) and only based on our instructions.

We undertake to transfer personal data only in cases specifically reported to the data subjects or in case of applicable obligations, or by decision of a court, governmental, supervisory or regulatory body, in particular tax authorities.

Transfer of personal data outside the European Union

We may transfer your personal data outside the European Union. In this case, your personal data is protected by specific contractual obligations and in accordance with the regulations in force.

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Your personal data is never kept beyond the time necessary for the processing for which it was collected, the achievement of the purposes detailed under point 4, subject however to legal or regulatory requirements applicable to the retention of personal data for a longer period (accounting information) or to establish, exercise and/or defend actual or potential rights in the context of legal actions, investigations or similar proceedings, including retention for legal purposes that we may impose to preserve relevant information.

7. HOW DO WE PROTECT YOUR PERSONAL DATA?

We take all appropriate physical, technical and organizational measures to ensure the security and confidentiality of personal data to prevent, as far as possible, any unauthorized access, falsification, disclosure or destruction of personal data. None of the companies that make up the GlobalPack Solutions group can be held liable in the event of force majeure, such as a cyberattack.

8. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE THEM?

We are committed to respecting the «Rights of data subjects» provided for by the GDPR.

To exercise these rights, you must send us a written request, accompanied by proof of your identity, to the following address: GlobalPack Solutions, 25 Salzbaach, L-9559 WILTZ or to the following e-mail address: gdp@nbn.lu.

If one of the companies of the GlobalPack Solutions group has not been able to give you satisfaction despite all its best efforts to ensure compliance with its legal obligations and, in the event of a dispute relating to



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the processing of personal data, you have the possibility of lodging a complaint with the Luxembourg data protection authority, the Commission Nationale pour la Protection des Données via their website: www.cnpd.public.lu/support/contact.html or at the following address:

Commission Nationale pour la Protection des Données, 1, avenue du Rock'n Roll, L-4361 Esch-sur-Alzette



In accordance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of personal data, as a data subject, you have the following rights:

1. RIGHT TO INFORMATION

Request information about which personal data is processed by our company (member of the GlobalPack Solutions group) and why. In case of transfer to a third country, be informed of the appropriate safeguards implemented for this transfer.

2. RIGHT OF ACCESS

Request access to your personal data held by our company (member of the GlobalPack Solutions group) and receive a copy thereof.

3. RIGHT TO RECTIFICATION

Request rectification or erasure of your inaccurate, incomplete or irrelevant personal data to the extent permitted by law or necessary for the execution of the contract or service, for example.

4. RIGHT TO OBJECT TO A DECISION BASED ON AUTOMATED PROCESSING

Assert your point of view and contest, where applicable, any decision made on the basis of automated processes, including profiling.

5. RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)

Request the erasure of data concerning you, unless a legitimate reason justifies their retention.

6. RIGHT TO DATA PORTABILITY

Retrieve, free of charge, the data provided to our company (in a structured, commonly used and machine-readable format) and transmit it to another organization (social network, Internet service provider, etc.).

7. RIGHT TO OBJECT

Terminate, at any time, processing of personal data necessary for the pursuit of our legitimate interests, unless there are compelling legitimate grounds to continue the processing (for example, defense of a legal right).

8. RIGHT TO RESTRICTION

Request the restriction of processing of your data in case of dispute regarding the accuracy of data, or objection to the erasure of data, in case of need for the establishment, exercise or defense of legal claims.

In case of restriction, the data can no longer be subject to any processing.