

RECRUITMENT PRIVACY NOTICE

Introduction

Scope of privacy notice

This Recruitment Privacy Notice explains the type of information Coveris processes, why we are processing it and how that processing may affect you.

What do we mean by “personal data” and “processing”?

“Personal data” is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about you.

"Processing" means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be “sensitive personal data”.

Your personal data

We process your data for the purposes of fulfilling our recruitment practices. Some of the personal data that we process about you comes from you. For example, you tell us your contact details. Other personal data about you is generated from references and third party companies such as recruitment agencies. Your personal data will be seen internally by managers, administrative assistants to HR/hiring managers, payroll, IT and HR.

You are not obliged to provide us with this data. However, not doing so may adversely affect your chances of recruitment.

How long do we keep your personal data?

If you are successful in your application your data will be kept on your personnel file. If you are unsuccessful, your data will normally be destroyed twelve months¹ after you have been informed that you were unsuccessful. Your data may be kept on file and considered for other roles. Irrelevant data such as CCTV images may be deleted after a short period.

Transfers of personal data outside the EEA

We may transfer your personal data outside the EEA to members of the Coveris group (Coveris Holdings S.A. and its subsidiaries) and processors in the United States, which may have lower data protection standards than are customary in the EEA. Where necessary these transfers are covered by the intra-group transfer agreement and model clauses.

The recipients of the personal data are indicated in Annex 2.

The transfer of personal data to recipients based outside of the EEA is carried out to obtain approval for new hires and remuneration levels. We will ensure that the transfer is lawful by using model clauses where necessary, and that there are appropriate security arrangements in place.

¹ Up to five years in France. Four weeks for recruitment in the Netherlands. Applications will not be retained in Poland, Austria, Hungary, Lithuania and the Czech Republic unless the candidate has given their consent.

Although there is no decision by the European Commission that certain countries provide an adequate level of protection, we have entered into an agreement ensuring appropriate and suitable safeguards with our Group members in those countries without adequate protection. This is in standard terms adopted by the Information Commissioner and approved by the European Commission. If you wish to see details of these safeguards, please ask the Information Security Officer.

Contact details

In processing your personal data, we act as a data controller. Our contact details are set out in Annex 1.

Legal grounds for processing personal data

What are the grounds for processing?

Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised certain grounds as Legal obligation and Legitimate Interests and outline what those terms mean below.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.

Processing sensitive personal data

If we process sensitive personal data about you, as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the grounds for processing sensitive personal data applies, including that the processing is for equality and diversity purposes to the extent permitted by law.

Further information on the data we process and our purposes

Examples of the data and the grounds on which we process data are in the table below.

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Recruitment	Standard data related to your identity (e.g. your name, address, place of birth, nationality, contact details, professional experience, education, language skills, and any other personal data that you present us with as part of your application related to the fulfilment of the role. Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided or background checks and any information connected with your right to reside and work. If relevant, we may also process information concerning your	Contract Legal obligation Legitimate interests Exercising specific rights in the field of employment

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
	health, any disability and in connection with any adjustments to working arrangements.	
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin	Contract Legitimate interests
Security	CCTV images	Legitimate interests

Who gets to see your data?

Your personal data may be disclosed to managers, HR and administrators for employment, administrative and management purposes as mentioned in this document. We may also disclose this to other members of our group, specifically any senior management for the Business Unit and for the Coveris Group that is relevant in order to make decisions around hiring and remuneration.

Access to your personal data and other rights

We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us. You can contact us at the email listed below for the applicable business unit:

Coveris Rigid: ISO.Rigid@coveris.com

Coveris EMEA Flexibles: ISO.EMEA@coveris.com

Coveris UK Food & Consumer: ISO.UKFC@coveris.com

Coveris Advanced Coatings: ISO.Coatings@coveris.com.

You also have a legal right to make a “subject access request”. If you exercise this right and we hold personal data about you, we are required to provide you with information, including a description of the personal data, and an explanation of why we are processing it.

If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted. If you have provided us with data about yourself (for example your address or bank details), you have the right to be given the data in machine readable format for transmitting to another data controller. This only applies if the ground for processing is consent or Contract.

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.

Complaints

If you have complaints relating to our processing of your personal data, you should raise these with HR or with the Information Security Officer in the first instance. You may also raise complaints with the statutory regulator. For contact and other details ask HR or see Annex 1.

Scope

This notice does not form part of any contractual relationship between the Company and a job applicant. This notice can be changed at any time.

ANNEX 1 – CONTACT INFORMATION

Data controller	Address
Coveris Rigid (Zell) Deutschland GmbH	Marienburgstrasse 25a 56856 Zell (Mosel) Germany
Coveris Group Germany Holding GmbH	Anton-Böhlen-Strasse 5 34414 Warburg Germany
Coveris Flexibles UK Limited	Holland Place Wardentree Park Pinchbeck Spalding Lincolnshire PE11 3ZN
Coveris Flexibles (Gainsborough) UK Limited	Holland Place Wardentree Park Pinchbeck Spalding Lincolnshire PE11 3ZN
Coveris Advanced Coatings (North Wales) Ltd.	Ash Road North Wrexham Industrial Estate Wrexham LL13 9UF United Kingdom

Business unit	HR/ISO contact details
Coveris Rigid	ISO.Rigid@coveris.com
Coveris EMEA Flexibles	ISO.EMEA@coveris.com
Coveris UK Food & Consumer	ISO.UKFC@coveris.com
Coveris Advanced Coatings	ISO.Coatings@coveris.com

Country	Data protection regulator	Contact details
UK	ICO	https://ico.org.uk/
Finland	Tietosuoja-valtuutettu	http://www.tietosuoja.fi/en/
France	CNIL	https://www.cnil.fr/
The Netherlands	Autoriteit Persoonsgegevens	https://autoriteitpersoonsgegevens.nl/
Austria	Österreichische Datenschutzbehörde	https://www.data-protection-authority.gv.at/

Baden-Wuerttemberg	Der Landesbeauftragte für den Datenschutz in Baden-Württemberg	https://www.baden-wuerttemberg.datenschutz.de/
Bavaria	Bayerisches Landesamt für Datenschutzaufsicht	https://www.lida.bayern.de/de/index.html
North Rhine-Westphalia	Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen	https://www.lidi.nrw.de/
Rhineland-Palatinate	Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Rheinland-Pfalz	https://www.datenschutz.rlp.de/de/startseite/
Bulgaria	Commission for Personal Data Protection	https://www.cdpd.bg/
Romania	National Authority for the Supervision of Processing of Personal Data	Ttp://www.dataprotection.ro/
The Czech Republic	Úřad pro ochranu osobních údajů	https://www.uouu.cz/en/
Hungary	The Hungarian National Authority for Data Protection and Freedom of Information	https://naih.hu/index.html
Lithuania	Duomenų apsaugos inspekcija	www.ada.lt

Relevant to Germany only:

The Data Protection Officer is DPO.Germany@coveris.com.

ANNEX 2 – DATA RECIPIENTS LOCATED OUTSIDE OF THE EEA

Business Unit	Recipients	Country
Coveris Rigid	N/A	N/A
Coveris EMEA Flexibles	N/A	N/A
Coveris UK Food & Consumer	N/A	N/A
Coveris Advanced Coatings	General Manager and executive officers of the business unit	United States