

Marketing and Sales Privacy Notice

This notice provides you with information on how the Mondi Group, in particular the entity of the Mondi Group you are in contact with („we“) will process your personal data.

1. Purposes for which we process your data

We will process your personal data (as set out in point 2 and Annex 1 below) for the following purposes:

- performing direct marketing via electronic and non-electronic means as well as advertising;
- business opportunity management and tracking of opportunities;
- analysis of customer satisfaction (where “customer” refers to our direct customers as well as end-customers);
- performing sales processes, compliance with sanctions (e.g., trade sanctions) and other regulatory requirements;
- managing of our relationships with (potential) customers, including the analysis of (potential) customers’ business needs and how they use our products and services;
- making available certain online services to customers and further optimizing and developing such services; and analyzing the usage of such services and generating access statistics;
- business analytics and statistical analysis, including the aggregation of data in order to analyze market trends and anticipate (potential) customer demand;
- analyzing and forecasting (potential) customer demand;
- documenting interactions (e.g., meetings, phone calls, e-mail conversations) with (potential) customers;
- management of the entire sales process;
- administration of any on-site visits at our premises, including ensuring the health and safety of our employees and visitors;
- sending product samples and promotional material,
- performing of prize draws and sweepstakes; and
- organization of and invitation to fairs, events, conferences, etc.

We collect this data either directly from you, from our service partners, distributors, your employer, or from public sources (e.g., social media, public Internet sources, public attendance lists of conferences or books).

The provision of personal data is voluntary. However, if you do not provide your personal data, we may not be able to perform relevant business processes, including marketing and sales processes.

2. Processed data categories and legal basis of the processing

In some cases, we may process the following categories of your personal data on the basis of your consent according to Article 6(1)(a) of the General Data Protection Regulation (“GDPR“), for which we may ask you in a separate process:

- Name, company name and employer, job title, email address and telephone number to the extent that they are used for direct marketing purposes.

We also process the categories of your personal data as set out in Annex 1 on the basis of our prevailing legitimate interest (according to Article 6(1)(f) GDPR), which lies in achieving the purposes as set out in point 1 above.

3. Transfer of your personal data

For the purposes set out above, we may transfer some of your personal data to the following recipients:

- IT service providers that we use;
- Mondi group entities;
- Customer satisfaction study providers and agencies that are doing for us the online marketing;
- marketing agencies;
- travel agencies and service providers for visa applications;
- distribution partners;
- logistics/fulfilment partners; and
- wholesalers

Some of the recipients referred to above are located or process personal data outside of your country. The level of data protection in another country may not be equivalent to the one in your country. Therefore, we take measures to guarantee that all recipients provide an adequate level of data protection. We do this for example by entering into appropriate data transfer agreements based on Standard Contractual Clauses (2010/87/EC and/or 2004/915/EC). Such agreements are accessible upon request by [e-mail](#).

4. Retention periods

Your personal data will only be kept for as long as we reasonably consider necessary for achieving the purposes set out in point 1 above and as is permissible under applicable laws. We will in any case retain your personal data for as long as there are statutory retention obligations or potential legal claims are not yet time-barred.

5. Your rights in connection with your personal data

Under applicable law, you have, among others, the rights (under the conditions set out in applicable law): (i) to check whether and what kind of personal data we hold about you and to request copies of such data, (ii) to request correction, supplementation or deletion of your personal data that is inaccurate or processed in non-compliance with applicable requirements, and (iii) to request us to restrict the processing of your personal data, (iv) in certain circumstances, to object for legitimate reasons to the processing of your personal data or to revoke consent previously granted for the processing; such an objection or revocation will not affect the lawfulness of the processing prior to the consent withdrawal, (v) to request data portability, (vi) to know the identities of third parties to which your personal data are transferred and (vii) to lodge a complaint with the competent authority.



6. Our contact details

Please address your requests and any other questions concerning this notice to any of the following:

- Your contact person at Mondi.
- Furthermore, you can find the contact details of each entity here:
<https://www.mondigroup.com/en/about-mondi/where-we-operate/our-locations/>.
- Alternatively, please use the [“contact us form”](#).

Annex 1

Categories of personal data:

a) Master data

- name;
- academic Title;
- salutation/sex;
- language;
- country
- picture;
- birth date;
- associated (potential) customer (employer);
- company address, e-mail address, phone number, fax, and other contact information;
- roles/functions at (potential) customer; and
- department.

b) Relationship data

- professional and personal interests;
- career information;
- meeting notes;
- receipt of and reaction to marketing and sales initiatives;
- information on participation in prize draws and sweepstakes (e.g. prize awarded);
- history of previous interactions with any Mondi Group company;
- information on the use of any online services provided by any Mondi Group company, including IP address, authentication data (e.g., username and password), URLs visited, time and date of the use of an online service or a particular feature thereof, name and version of the client software used, location data, and the webpage (URL) visited before accessing the online service;
- history of orders placed;
- history of inquiries made;
- customer category;
- correspondence; and
- additional information necessary to ensure the health and safety of our employees and visitors (e.g., necessary protective gear, body height and shoe size, travel history, questionnaires)

c) Commercial information

- scope of power of attorney for the (potential) customer;
- history of commercial transactions with any Mondi Group company;
- contracts entered into on behalf of the customer;
- contractual documentation;
- information about contract performance and instances of non-performance; and
- information about the expiration and termination of the contract.



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