



PRIVACY STATEMENT

Privacy Statement

This Privacy Statement was last updated March 26, 2020.

As a leading provider of packaging equipment to hundreds of businesses around the world, privacy and data protection are of the utmost importance to Combi Packaging Systems LLC (“Combi”, “we” or “us”).

This Privacy Statement details Combi's policies with respect to the handling of personally identifiable information ("Personal Information") submitted to or otherwise collected by Combi via Combi's website, mobile application(s), and/or in the course of providing its payment processing, payment security and fraud management solutions and services (collectively, the “Services”). Combi will use and disclose Personal Information in accordance with the terms of this Privacy Statement. Please note that Personal Information does not include publicly available information about you or information that has been de-identified, anonymized or aggregated in a way that your Personal Information cannot be traced back to you individually. This Privacy Statement is part of, and is governed by, the terms and conditions set forth in our [Terms of Use](#). Terms not defined in this Privacy Statement have the meaning given to them in our Terms of Use. If you do not feel comfortable with any part of this Privacy Statement or our Terms of Use, you must not Interact with us through our website (“Site”). Please use our [Contact Us](#) feature to call or write to us.

Personal Information we collect:

Personal Information is information which can be used to identify an individual. We collect Personal Information any time when the Services are used, when you provide it to us directly, and it is provided to us by merchants or financial institutions. The collection of certain Personal Information is necessary for use of the Services and to conduct business with us. These categories are:

- Consumer Name
- Contact information (such as email address, phone number, and mailing address)
- Order and payment information
- IP address and information about the device used to access the Services
- How and which Services are used
- Merchant and merchant account information, including account information we may gather from third party sources
- Information provided to us through means such as social media or when you [Contact Us](#) through our website



Use of Cookies and Online Tracking Preferences

Combi and its trusted third party service providers use certain tools to collect information about users browsing our website. These tools use cookies which are small text files that are stored on a user's computer hard drive. The cookies are used, among other things, to improve website performance, to provide customized viewing options, to compile statistical reports on website activity, for fraud reduction or for security purposes. We also use cookies to recognize customers or a previous visitor of our website, or to pre-populate website forms. Such information may be disclosed to third parties to provide any of the activities mentioned above on behalf of Combi.

To find out more about cookies, including browser-specific instructions on how to restrict or block cookies, go to <http://www.allaboutcookies.org>. Remember, though, without cookies, users may not be able to take full advantage of all of our website features.

We may also use locally stored objects (sometimes referred to as "Flash cookies") for security and fraud detection purposes. Flash cookies are not managed through web browser settings. Please visit Adobe's Flash Player Help website for help with managing Flash cookies.

You can choose not to provide us Personal Information when you use our website(s) or mobile application(s). However if the information request is not identified as optional and a user chooses to not provide required Personal information, then you may not be able to use the features of the website or mobile application. You should [Contact Us](#) by telephone to choose an alternate method of providing us with Personal Information.

You can opt out of receiving promotional email from Combi by following the unsubscribe link in those email messages. If you have opted-in to receiving text messages from us, you can opt out of receiving SMS text messages from Combi by replying STOP to any message.

Some browsers have incorporated Do Not Track ("DNT") preferences. Most of these features, when turned on, send signals to the website you are visiting that you do not wish to have information about your online searching and browsing activities collected and used. As there is not yet a common agreement about how to interpret DNT signals, we do not honor DNT signals from website browsers at this time. Implementing a DNT preference also does not signify a "**do not sell**" request. We understand that various parties are developing "do not sell" signals, and we may recognize certain such signals if we conclude such a program is appropriate.

You may refuse or delete cookies; however, some of our website functionality may be not work properly.



How we use Personal Information

The Company does not rent, sell or share Personal Information about you with other people or non-affiliated companies except to provide content that you have requested, or under the following circumstances. Usage and disclosure of Personal Information varies based on a party's relationship with Combi and the corresponding legal basis, where applicable. Combi primarily uses this information to provide the content of the website, Services and related features and to

- Facilitate the processing of payment transactions
- Respond to requests and inquiries
- Provide support services
- Send administrative information, such as changes to our terms, conditions, and policies
- Administer promotions or contests
- Facilitate social sharing functionality
- Analyze and monitor Services usage and to make improvements
- Help secure the Services, prevent fraud and enforce our policies
- Help personalize our Services
- Communicate about other Combi services or those of our affiliates or other third parties
- To make contact, directly or through a third party vendor, to complete a survey or questionnaire
- To communicate, directly or through a third party vendor, about Combi offerings, about general company news and industry trends, and to address responses to a survey or questionnaire
- Compile information for use on an aggregated and de-identified basis
- Conduct data analysis and research, audits, develop new products, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities
- Perform other activities with consent

How we share Personal Information

We will only share Personal Information as described in this Privacy Statement. Specifically, we may share Personal Information:

- As necessary to perform the Services and to complete payment transactions
- With companies and vendors that help us to operate our business by providing services such as website hosting, fraud screening, data analysis, information technology and related infrastructure provision, customer service, email delivery, auditing and other similar services
- With third parties that have contracted with Combi to perform certain functions on our behalf
- With third parties sponsors of promotions or contests where consent has been given



- To comply with law or other legal obligations such as responding to subpoenas, or other requests from public and government agencies, including laws and other legal obligations outside a party's country of residence
- To protect our rights, operations or property, or that of our users
- To investigate, prevent, or take action regarding potential or suspected illegal activities, fraud, threats to the personal safety of any person, or violations of the Service's terms and conditions
- With other companies that control, are controlled by, or are under common control with Combi that support the provision of Transaction Services or relationship with a party. This includes its subsidiaries and parent companies.
- With a purchaser of all or a unit of Combi (or the majority of Combi's or its unit's assets), a merger, acquisition, or internal reorganization of Combi or a unit of Combi
- With consent

Please note that any information that you post to public areas such as on our social media pages may be seen by other visitors. Combi does not consider this information to be Personal Information.

Accessing or editing Personal Information

Combi may be contacted at the email address at the bottom of this Privacy Statement to request access to or that we update, or correct the Personal Information collected by our Services. Combi may retain Personal Information for auditing purposes, to troubleshoot problems, assist with investigations, enforce our policies or comply with legal requirements.

Third Parties and Linked services

The inclusion of a link on the Combi website does not imply endorsement of the linked site or service by Combi.

Security

We employ appropriate technical and organizational measures to ensure a level of security that is appropriate to our Interactions with you. No method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee its absolute security and cannot be responsible for unencrypted information that you send if it is subsequently subjected to unauthorized access. We strongly recommend that you not provide Personal Information to use through the [Contact Us](#) feature or other points of contact on this website.

Changes to this Privacy Statement

We may change this Privacy Statement at any time by posting an updated Privacy Statement with an updated effective date. By continuing to use this site and use our



Services after those changes become effective, you agree to be bound by the revised Privacy Statement. You should revisit this page from time to time to check the Effective Date at the top of this page to determine whether there have been any updates since your last visit.

Retention period

We will retain Personal Information for the period necessary to fulfill the purposes outlined in this policy unless a longer retention period is required or permitted by applicable law or regulation.

Protection of Children

Our website, Services, and Products are not directed to or sold to persons under 18. We do not knowingly collect Personal Information from children under 18. Any individuals under the age of 18 must have consent to interact with us or use the Services from their parent or guardian. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should [Contact Us](#). If we become aware that a child under 18 has provided us with Personal Information, we will take steps to delete such information.

How to contact Combi regarding your privacy concerns and questions

If you have questions or comments about our privacy practices, or if you want Combi to correct your Information that is stored on Combi systems, please submit your request in writing to:

Combi Packaging Systems LLC
PO Box 35878
Canton, OH 44735
ATTN: Controllers Office
Fax: (330) 456-4644

United States – State Laws and Regulations Regarding Individual Consumers' Privacy Rights

Combi Packaging Systems' Products are not intended for individual consumer purchase or use. However, if you are an individual consumer and are a resident of one of the states listed below, you may have additional privacy rights granted to you by your state of residence.

- **California.** Under the California Consumer Privacy Act ("CCPA"), California consumers have certain rights they may exercise either independently or through an authorized agent. CCPA rights requests are subject to an identification and verification process. We will not fulfill a CCPA request unless we have been provided sufficient information for us to reasonably verify that the requestor is the



consumer about whom we collected Personal Data. If you are an individual consumer residing in the state of California, these rights may apply to you.

- Some Personal Data we maintain about consumers (e.g., clickstream data) is not sufficiently associated with enough Personal Data about the consumer for us to be able to verify that it is a particular individual. Accordingly, we will not include such information in response to consumer requests. If we cannot comply with a request, we will explain the reasons in our response. You are not required to create an account with us to make a request. We will use Personal Data provided in your request only to verify your identity or authority to make the request and to track and document request responses, unless you also provided the Personal Data to us for another purpose.
- Disclosure Rights. You have the right to request that we disclose the following Personal Data for the 12-month period prior to the request date. Consumer requests of this nature may be made no more than once in a 12-month period. With respect to (1) and (2) below, we will provide this information in a portable and, if technically feasible, readily usable format.
 1. The categories of Personal Data we have collected about you. °The categories of sources from which we collected your Personal Data and the purpose for collection.
 2. The specific pieces of Personal Data we have collected about you.
 3. The categories of third parties to whom we have disclosed your Personal Data.
 4. Although we do not sell your Personal Data, in the event that our practices change, we will provide a list of the categories of Personal Data we sold about you in the prior 12 months, including the categories of third parties to whom we sold your Personal Data and the business or commercial purposes for the sale (or a statement that no such sale occurred).
- “Do Not Sell” Rights. As stated above, we do not sell California consumer Personal Data as defined under the CCPA, and until such time as we change our practices by updating this Privacy Statement, will treat Personal Data collected under this Statement as subject to a “do not sell” request. Please see Section 7 regarding “do not track” mechanisms.
- Deletion Rights. You may request that we delete your Personal Data that we have collected directly from you. Under the CCPA, we may decline to delete your Personal Data under certain circumstances, for example, if we need the Personal Data to complete transactions or provide services you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes (including maintaining business and employment records), to comply with law, or to exercise or defend legal claims or other legal rights. Note also that we are not required to delete your Personal Data that we did not collect directly from you.
- Non-Discrimination. We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights.



- **Nevada. “Do Not Sell” Rights.** We do not sell Personal Data. Until such time as we change our practices by updating this Privacy Statement, we will treat Personal Data of Nevada residents that is collected on the website as subject to a “do not sell” request.

General Data Protection Regulation

This section only applies to Interactions with individuals who are located in the European Economic Area, United Kingdom and/or Switzerland (collectively, the “Designated Countries”) at the time of data collection.

We may ask you to identify which country you are located in when you Interact with us, or we may rely on your IP address to identify which country you are located in. When we rely on your IP address, we cannot apply the terms of this section to any individual that masks or otherwise hides their location information from us so as not to appear located in the Designated Countries. If any terms in this section conflict with other terms contained in this Statement, the terms in this section shall apply to users in the Designated Countries.

- **Our Relationship with You.** *** is a data controller with regard to any Personal Data collected from you pursuant to an Interaction. A “data controller” is an entity that determines the purposes for which and the manner in which any Personal Data is processed. Any third parties that handle your Personal Data in accordance with our instructions are our service providers and are “data processors.” You are a “user.” Users are individuals providing Personal Data to us via an Interaction, such as signing up for our newsletter(s), requesting Product information, or otherwise accessing or using the information or features on this Site.
- **Marketing.** We will only contact individuals located in the Designated Countries by electronic means (including email or SMS) as permitted by applicable law or your consent. If you do not want us to use your Personal Data in this way, or to disclose your Personal Data to third parties for marketing purposes, click an unsubscribe link in your email, or [Contact Us](#).
- **Individual Rights.** We may limit your individual rights requests (a) where denial of access is required or authorized by law; (b) when granting access would have a negative impact on others’ privacy; (c) to protect our rights and properties; or (d) where the request is frivolous or burdensome.
 1. **Right to withdraw consent.** For any consent-based processing of your Personal Data, you have the right to withdraw your consent at any time. A withdrawal of consent will not affect the lawfulness of our processing or the processing of any third parties based on consent before your withdrawal.
 2. **Right of access.** Upon your request, we will provide you with a copy of your Personal Data in our files without undue delay and free of charge. Your access may be limited to the extent it would adversely affect the rights and freedoms of other individuals.



3. **Right to rectification (or “correction”).** You may request to correct or update any of your Personal Data in our files. To update your Personal Data, [Contact Us](#).
4. **Right to erasure (or the “Right to be Forgotten”).** Upon your request, we will erase any of your Personal Data in our files that: is no longer necessary in relation to the purposes for which it was collected or otherwise processed; was collected in relation to processing that you previously consented to, but later withdrew such consent; or was collected in relation to processing activities or Interactions with us to which you object, and there are no overriding legitimate grounds for our processing.
5. **Right to Restrict and Object.** You have the right to restrict or object to our processing of your Personal Data.
6. **Right to data portability.** If we process your Personal Data based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request to receive your Personal Data, with certain legal limitations.
7. **Notification to third parties.** We will notify third parties also handling the relevant Personal Data of any request by you pursuant to this section. Upon your request, we will identify such third parties.

Residents of Mexico

As a resident of Mexico, you may object to the processing of your Personal Information for the following voluntary uses of such Personal Information: to communicate or send you promotions; to provide you with relevant Product advertising; or to determine the effectiveness of our advertising through analytical tools described above. You have a right to access and correct your Personal Information. Local law may provide you the right to cancel or oppose the collection and processing of your Personal Information; limit the scope of processing; and to revoke your consent. Please [Contact Us](#) to explain what right you want to exercise and provide proof of identity. We will reply in accordance with applicable law. If you would like to correct or update your Personal Information, please provide us the corrected information.

Residents of Canada

If you are a resident of Canada, the Personal Data Protection and Electronic Documents Act (PIPEDA) set forth by the Office of the Privacy Commissioner of Canada applies to you. To learn more about PIPEDA, visit https://www.priv.gc.ca/information/pub/guide_ind_e.asp. If you have questions about PIPEDA as it pertains to the use or storage of, and access to your Personal Data, please [Contact Us](#).