



# DATA PROTECTION INFORMATION

With this privacy information, we would like to inform you about how your personal data is processed by MM Group (hereinafter referred to as "we" or "us").

Of course, we process your personal data in accordance with all provisions of data protection law, whereby the legal basis for data processing also result in particular from the respective law of the member state to which the controller is subject. MM Group attaches great importance to the protection, accuracy and integrity of your personal data.

In the following, you will find information on how we process data from visitors of our websites and social media fan pages, users of the contact form, online applicants, subscribers to our corporate publications and users of our whistleblowing system (3.1), as well as from shareholders (3.2) and business and contractual partners (3.3). This statement also includes information on how we handle video and audio recordings made by security cameras and data processed by electronic access control systems (3.4). It also informs you about how your data is processed when you visit one of our sites (3.5). The terms used in this document include all genders equally. All persons may feel addressed in the same way by the contents of this document.

## 1. Controller

With regard to the stated purposes, that subsidiary of the MM Group whose website or social media fan page you visit, whose company publications or newsletters you order, with which you conclude or wish to conclude a deposit, loan or securities transaction or with which you have a business relationship or wish to enter into such a relationship is responsible for the processing of your personal data and therefore the data controller. In connection with video surveillance or electronic access control systems as well as intercom systems, the MM Group company in whose sphere of influence the video surveillance system or access control system is located is responsible for data protection. If you visit an MM Group site as a guest, the MM Group company whose facilities you enter is responsible for processing the data collected in the course of that visit. The group-wide whistleblowing system set up by us is technically and organizationally operated by MM Service GmbH, which is therefore jointly with all other affiliates of the MM Group the data controller under data protection law.

Irrespective of the specific responsibility under data protection law, we would like to provide you with the contact details of the companies located at the headquarters of the MM Group:

<b>Mayr-Melnhof Karton Aktiengesellschaft</b>	<b>MM BOARD &amp; PAPER GmbH</b>	<b>MM PACKAGING GmbH</b>	<b>MM Service GmbH</b>
Brahmsplatz 6 1040 Vienna, Austria +43 (0)1 501 36 – 0 <a href="http://www.mm.group">www.mm.group</a>			



## 2. Data Privacy Officer

In the following you will find the contact details of the Group Data Privacy Officer of the MM Group according to Article 37 ff of the European General Data Protection Regulation (GDPR):

<b>Group Data Privacy Officer</b>
Brahmsplatz 6 1040 Vienna, Austria <a href="mailto:privacy@mm.group">privacy@mm.group</a>

## 3. Data Processing Activities

The individual companies of the MM Group are to be regarded as independent data controllers in connection with the following processing activities. In this context, the data of various groups of persons are processed independently and separately of each other:

### 3.1. Websites and Social-Media

#### 3.1.1. General provisions

The MM Group websites offer various functionalities. We process data that identifies you or makes you identifiable. This data is collected, for example, directly by filling out a form, but also indirectly by simply calling up the websites. In the following, we provide an overview of how your personal data is processed with regard to the use of these websites.

#### 3.1.2. Purposes and legal basis

##### 3.1.2.1. Operation of the websites

###### 3.1.2.1.1. General provisions

We process personal data in order to be able to operate the websites. For this purpose, technically necessary data is processed. This includes, for example, IP address, browser type, browser version, browser language, operating system, location, server log files, information on referring and exiting websites or URL addresses, error logs and, in particular, cookies. The processing of this personal data is absolutely necessary, otherwise the websites would not function properly. Therefore, we have a legitimate interest in processing this data because it serves the operation, correct display and optimization of our websites.

The legal basis for this is Article 6 (1) (f) GDPR.

###### 3.1.2.1.2. Local Storage

Our websites have a so-called local storage function. Data is stored in the local memory or cache of your browser. If you do not delete the cache after visiting our website or if it is not merely a short-term session



storage function, this data is also stored after you close your browser. This data can be read by us, but third parties do not have access to this data. We have a legitimate interest in processing this data and storing it in the local memory of your browser. Please refer to the following paragraphs for a detailed description of the use of cookies, plugins and other tools which are based on these local storage function.

The legal basis for this is Article 6 (1) (f) GDPR.

#### **3.1.2.1.3. Server log files**

In order to ensure a functioning and secure website and internet presence, it is necessary to process technically required data about accesses to our websites. For this purpose, every time our websites are accessed and every time a retrieval of a file from the associated server is completed or attempted, information about this process is stored in a log file. This access data is automatically transmitted to us by your browser. Log files contain automatically maintained protocols of all actions of processes on our servers that are used for the operation of the websites. These files, which comprehensively log all events on our computer systems or in our networks, include in particular the name of the website or file you accessed, the type of browser used including details of the version, the operating system used, the name of your internet service provider, the website previously visited, the date and time of the request to the server, the specific amount of data transferred, the information as to whether the retrieval was successful or failed, the name of the accessing computer and the IP address used.

However, this information is not assigned to any natural persons. We also do not attempt to establish such a personal connection. Its purpose is statistical evaluation, which above all serves the secure operation of our websites. This is to identify performance bottlenecks and improve the performance of the servers. Log files are also used to optimize our website. This data is only transmitted to the website host, which operates the websites on servers or data centers in Austria. This data is not linked to other sources. However, we reserve the right to check this data retrospectively in the event of suspicion of unlawful use of our websites. Therefore, log files are generally not linked to a specific person, but in individual cases regulated by law, we can create a personal reference established through the involvement of the internet service provider.

The legal basis for this is Article 6 (1) (f) GDPR.

We have a sufficient interest in the technically error-free operation of our websites and the improvement of our web presence. In addition, we want to be in a position to recognize attacks on our websites at an early stage, to investigate them and, in particular, to prevent them. As explained, in individual cases our interest may also lie in legal prosecution. However, it may also be that we are obliged to process data by authorities or courts that are legally authorized to do so.

The legal basis for this is Article 6 (1) (c) GDPR.

#### **3.1.2.1.4. Cookies**

When you visit our website, a so-called cookie banner opens. This is a window that is displayed to visitors when they visit our website for the very first time. On the one hand, it informs you that the website you are visiting collects personal data about you through the use of cookies, but on the other hand, you can also select individual settings for the use of cookies.



Cookies are text files that are stored on your end device, such as a PC, tablet or smartphone, when you visit a website with the help of your browser and contain information about your visit, such as websites viewed and session details. They include the respective name of the cookie, the name of the server from which the cookie originates, an identification number and the time at which the cookie is automatically deleted. This also includes your anonymized IP address, the type of browser used, the operating system, the type of end device, the name of the domain and its host, the date and the time of the website visit.

Cookies consist of technical information that identifies you as a user. They serve to recognize the website user so that he or she is recognized by our websites when they are called up again with the same device. Certain settings and data can thus be provided automatically and tailored to you. The information stored in cookies is transmitted either to the websites visited ("first party cookie") or to another website to which the cookie is assigned ("third party cookie"). A distinction must be made between so-called session cookies, which are automatically deleted after the browser is closed, and temporary or permanent cookies, which are stored on your end device for a longer or unlimited period of time. The respective storage period is determined by the providers of the cookie.

Furthermore, a distinction can be made between technically necessary and optional cookies. Technically necessary cookies are mandatory for the functionality of our websites. They fulfil technical and security-relevant aspects, which is why they serve the operation of the websites and make them functionally usable for you. This includes, above all, basic functions such as navigation on the websites. Our websites cannot be executed or displayed correctly without the use of these cookies. Their use is therefore based on our legitimate interest, because otherwise no properly functioning websites can be offered.

The legal basis for this is Article 6 (1) (f) GDPR.

Furthermore, there are also cookies that are stored on your computer to analyse the way websites are used. They provide valuable insights to website operators and help make informed decisions to improve the user experience. We process cookies that are used for anonymous statistical purposes, for convenience settings or to display personalized content. With the help of this information, which is anonymized immediately after the cookie settings have been selected or the websites have been called up, we can, for example, determine the number of visitors, the range and performance as well as the effect of certain pages of our website, compile anonymous statistics and analyses and subsequently optimize our content. Statistics Cookies collect information about how websites are used in order to improve their attractiveness, content and functionality. Cookies that are used for comfort settings or personalization are used to show you personalized content that matches your interests, preferences and behaviour. They are used to communicate personalized information about our services and products. These cookies store or contain information about a user's choices, such as preferred language or region. By storing these preferences, we can offer personalized content and recommendations on our websites to improve the user's experience.

The legal basis for this is Article 6 (1) (a) GDPR.

Therefore, these cookies are only used with your consent, which you can revoke or reset at any time with effect for the future by reopening the cookie banner on our websites or in your browser settings in accordance with Article 7 (3) GDPR. By doing the latter, the cookie banner will be reopened when you visit the websites again and you can change your previously made settings. The use of cookies can also be generally deactivated in your browser settings. You can select the browser settings so that the storage

of cookies is prevented. In this case, however, you will be asked each time you use the website whether you agree to the setting of cookies. Please note that if you reject the personalization cookies, it is possible that not all functionalities of the websites, such as the playback of embedded videos, will be available. In addition, you can delete the cookies already set at any time using your browser settings. To do this, use the help function of your browser and follow the instructions.

The following illustration provides an overview of the cookies we use:

Cookie name	Purpose of the cookie	Expiry date
_gid (Google Analytics)	The cookie "_gid" is a <b>statistics cookie</b> from Google Analytics. It is used to distinguish users and store information about how visitors use a website. The cookie helps generate statistical data on website usage by tracking individual user interactions made on the website. It is typically used to distinguish between different users visiting the same website at the same time. The "_gid" cookie has an expiry time of one day.	1 day
_ga (Google Analytics)	The cookie "_ga" is a <b>statistics cookie</b> from Google Analytics. It is used to distinguish individual users by assigning a randomly generated unique identifier to each visitor. This cookie enables Google Analytics to track and analyse user interactions made on websites. It helps generate statistical data about website usage and user behaviour. The "_ga" cookie has a comparatively long expiry time of one year.	1 year
_gcl_au (Google AdSense)	The cookie "_gcl_au" is a <b>statistics cookie</b> from Google Ads. It is used to measure and optimize advertising performance. Typically, it is used to track user actions and interactions on those websites where Google Ads is used. The cookie helps to determine the effectiveness of advertising campaigns by collecting information such as click behaviour and interaction rates. The cookie "_gcl_au" has a relatively short expiration time of 90 days.	90 days
_gat_UA-75461727-1 (MM Group)	The cookie "_gat_UA-" is a <b>statistics cookie</b> from Google Analytics. This is used to throttle the request rate to the Google Analytics service. It is typically used to limit the amount of data collected on high traffic websites. By controlling the request rate, the cookie helps to ensure that the website does not exceed the limits set by the Google Analytics service. The cookie "_gat_UA-" has a short expiry time of one day.	1 day



<p>_gat_UA-75489452-1 (MM BP)</p>	<p>The cookie "_gat_UA-" is a <b>statistics cookie</b> from Google Analytics. This is used to throttle the request rate to the Google Analytics service. It is typically used to limit the amount of data collected on high traffic websites. By controlling the request rate, the cookie helps to ensure that the website does not exceed the limits set by the Google Analytics service. The cookie "_gat_UA-" has a short expiry time of one day.</p>	<p>1 day</p>
<p>_dc_gtm_UA-75489452-1 (MM BP)</p>	<p>The cookie "_dc_gtm_UA-" is a <b>statistics cookie</b> from Google Analytics. This is used to throttle the request rate to the Google Analytics service. It is typically used to limit the amount of data collected on high traffic websites. By controlling the request rate, the cookie helps to ensure that the website does not exceed the limits set by the Google Analytics service. The cookie "_dc_gtm_UA-" has a short expiry time of one day.</p>	<p>1 day</p>
<p>_gat_UA-75484532-1 (MMP)</p>	<p>The cookie "_gat_UA-" is a <b>statistics cookie</b> from Google Analytics. This is used to throttle the request rate to the Google Analytics service. It is typically used to limit the amount of data collected on high traffic websites. By controlling the request rate, the cookie helps to ensure that the website does not exceed the limits set by the Google Analytics service. The cookie "_gat_UA-" has a short expiry time of one day.</p>	<p>1 day</p>
<p>_dc_gtm_UA-75484532-1 (MMP)</p>	<p>The cookie "_dc_gtm_UA-" is a <b>statistics cookie</b> of the Google Tag Manager (GTM). Google Tag Manager is a tool that allows website owners to manage various tags and tracking codes on their website. The cookie is used to manage and load other scripts and tags on a website. The cookie "_dc_gtm_UA-" is specifically used by Google Tag Manager to manage the loading of other scripts and tags associated with Google Analytics. It facilitates the implementation and management of the Google Analytics tracking code on the website. The cookie does not collect any personal data and is only used for functional purposes.</p>	<p>1 day</p>
<p>In_or (Linkedin)</p>	<p>The cookie "In_or" is a <b>statistical cookie</b> used by LinkedIn to identify and track user's preferences and activities on the LinkedIn platform. It helps LinkedIn provide a personalized experience by storing user's preferences, such as language settings and login information. However, this cookie can also be used for targeted advertising purposes. Using this cookie, LinkedIn can display advertisements to individual users based on their browsing behaviour.</p>	<p>1 day</p>

ci.personalization (Cookie Consent Tool)	The "ci.personalization" cookie is a <b>technically necessary cookie</b> that serves personalization purposes because it stores consent to the use of personalization cookies.	1 year
ci.statistics (Cookie Consent Tool)	The cookie "ci.statistics" is a <b>technically necessary cookie</b> that serves personalization purposes because it stores consent to the use of statistical cookies.	1 year
ci.necessary (Cookie Consent Tool)	The cookie "ci.necessary" is a <b>technically necessary cookie</b> because it stores the information that technically necessary cookies are mandatory for the operation of the website.	1 year
ci.accepted (Cookie Consent Tool)	The cookie "ci.accepted" is a <b>technically necessary cookie</b> that serves personalization purposes because it saves the status of the cookie banner when visitors manually close one of our websites.	1 year
fe_typo_user	The cookie "fe_typo_user" is a <b>technically necessary cookie</b> used by TYPO3 to add honeypot entries to forms. This is a security mechanism used to catch and identify potential attackers or spam bots.	1 day

### 3.1.2.1.5. Google Analytics

We use Google Analytics, a web analytics service provided by Google Ireland Limited, Barrow Street, Dublin 4, Ireland. This makes it possible to assign data on sessions and interactions across multiple devices to an anonymous user ID and thus to analyse a user's activities across devices. If you have consented to the processing of third-party cookies in your browser settings, your personal data will be processed in this way by our websites and the information generated by the cookie about your use of the websites will be transmitted to a Google server. Google receives information about your use of the website, such as the length of time you spend on the website, the time of your visit to the website, the path of your clicks and information about the websites you have viewed up to that point, including URL addresses, but also technical information about the end devices you use, such as their settings, the operating system used, the type and version of the browser, the internet service provider, the approximate location and, in particular, the shortened IP address, the host name of the accessing computer and the time of the server request. Google uses this information for the purpose of evaluating the use of the website, compiling reports on website activity and providing us with other services relating to internet usage.

However, due to the activation of IP anonymization on the websites, your IP address will be shortened by Google beforehand within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area. The profiles created in this way are therefore anonymized and are not merged by Google with other data sources. No personal analysis is carried out. Only in exceptional cases the full IP address will be transmitted to a Google server and shortened there. Google Analytics sessions and campaigns are terminated after a certain period of time. By default, sessions are terminated after 30 minutes without activity and campaigns after six months. The time limit for campaigns can be a maximum of two years. The use of Google Analytics is based on your consent given in connection with the selection of the cookies to be permitted.



The legal basis for this is Article 6 (1) (a) GDPR.

Your consent also includes a possible transfer of your personal data to Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, in the USA. The USA is assessed by the European Court of Justice as a country with an insufficient level of data protection according to EU standards. In particular, there is a risk that your data may be processed by US authorities or intelligence services for control and monitoring purposes, possibly without any legal recourse. For example, Section 702 of the Foreign Intelligence Surveillance Act (FISA) does not provide for any limitation on the surveillance and investigative measures transferred to the US intelligence services. There are insufficient safeguards to protect non-US citizens. The Presidential Policy Directive 28 (PPD-28) also does not provide effective remedies to data subjects against measures taken by these authorities, nor does it provide for barriers to ensure proportionate measures. Moreover, the Privacy Shield Ombudsman does not have sufficient independence from the executive branch and cannot issue orders binding on US intelligence agencies. Notwithstanding this, however, we have done everything possible to protect your personal data through appropriate technical and organizational measures. These include, first and foremost, the aforementioned IP anonymization.

The legal basis for this is Article 6 (1) (a) GDPR.

Please note that you have the right to revoke your consent at any time with effect for the future. To do so, reopen the cookie banner by clicking the button on our websites or reset your browser settings. By doing the latter, the cookie banner will be reopened when you visit the websites again and you can change your previously made settings. The use of cookies can also be generally deactivated in your browser settings. You can select the browser settings so that the storage of cookies is prevented. In this case, however, you will be asked each time you use the website whether you agree to the setting of cookies. However, if you refuse the personalization cookies, you may not be able to use all the functionalities of the site. In addition, you can delete the cookies already set at any time using your browser settings. To do this, use the help function of your browser and follow the instructions.

You can also prevent the collection of data generated by the cookie and related to your use of the website, including your IP address, by Google and the processing of this data by Google by installing a browser add-on. To do this, download the browser plug-in from the following link and install it on your device:

<https://tools.google.com/dlpage/gaoptout>

Opt-out cookies prevent the future collection of your data when visiting these websites. To prevent collection across different devices, you must opt out on all systems used.

You can find out about the specific locations of Google's data centers here:

<https://www.google.com/about/datacenters/inside/locations>

For more information on Google's use of data, please visit the following websites:

<https://www.google.com/analytics/terms>

<https://www.google.de/intl/en/policies>



#### **3.1.2.1.6. Google Conversion Tracking**

We use Google Conversion Tracking in conjunction with Google Analytics. This allows us to measure the behaviour of our website users. For example, we can see how many PDF files were downloaded or how often contact forms were used. Similarly, we can see how many clicks on ads in external sources, such as LinkedIn, have led to our websites. The shortened IP address transmitted by your browser as part of Google Analytics is not merged with other data by Google.

The legal basis for this is Article 6 (1) (a) GDPR.

#### **3.1.2.1.7. Google Marketing Platform (Ad Manager)**

Google Marketing Platform or Ad Manager is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The Google Marketing Platform uses cookies to present you with advertisements that are relevant to you. The purpose of the processing of your personal data is the cross-website placement of advertisements. For this purpose, a pseudonymous identification number is assigned to your browser in order to check which advertisements were displayed in your browser and which were also called up. This enables Google to identify the websites you have visited. However, the use of the Marketing Platform or Ad Manager cookies only enables Google and its partner websites to serve ads based on previous visits to our website or other websites on the Internet. The use of this service is based on your consent given in connection with the selection of cookies to be allowed.

The legal basis for this is Article 6 (1) (a) GDPR.

Your consent also includes a possible transfer of your personal data to Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, in the USA. The information generated by the cookies is transferred by Google to a server in the USA for analysis and stored there. A transfer of data by Google to third parties only takes place within the framework of legal regulations or within the framework of commissioned data processing. Under no circumstances will Google link your data with other data collected by Google. However, the USA is considered by the European Court of Justice to be a country with an insufficient level of data protection by EU standards. In particular, there is a risk that your data may be processed by US authorities or intelligence agencies for control and monitoring purposes, possibly without any legal recourse. Here too, we have done our utmost to protect your personal data through appropriate technical and organizational measures.

The legal basis for this is Article 6 (1) (a) GDPR.

Please note that you have the right to revoke your consent at any time with effect for the future. To do so, reopen the cookie banner by clicking the button on our websites or reset your browser settings. By doing the latter, the cookie banner will be reopened when you visit the websites again and you can change your previously made settings. The use of cookies can also be generally deactivated in your browser settings. You can select the browser settings so that the storage of cookies is prevented. In this case, however, you will be asked each time you use the website whether you agree to the setting of cookies. Please note, however, that if you reject the personalization cookies, you may no longer be able to use all of the site's functions. In addition, you can delete the cookies already set at any time using your browser settings. To do this, use the help function of your browser and follow the instructions.



In addition, you can prevent the collection of the data generated by the cookies and related to your use of the websites to Google as well as the processing of this data by Google by downloading and installing the browser plugin available under the following link under the item Google Marketing Platform Deactivation Extension:

<https://adssettings.google.com/anonymous>

### **3.1.2.1.8. Google Tag Manager**

We use the Tag Manager from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The Google Tag Manager is a service that we use to manage our website tags, i.e. keywords and phrases that describe the content of our pages and make our site findable on Google. This allows us to integrate snippets, which are short summaries of our websites that appear on search engines like Google as search results, or tracking codes or conversion pixels on our websites without having to change the source code. Only the Google Tag Manager code needs to be integrated into the source code. The Tag Manager records interactions that are made on our websites. These are then sent on to the connected tools, which is why the evaluation of the data itself is not possible with the Tag Manager. The Google Tag Manager is used exclusively to manage other services in our online offering. Your data is only forwarded by it, but not stored. However, it may be that these other tags collect personal data, even if the Tag Manager does not access this data. This is used exclusively for the administration of other services and is a domain that does not use cookies. If you have made a deactivation at the domain or cookie level, this remains in place for all tracking tags implemented with the Tag Manager. The use of Google Tag Manager is based on our legitimate interests, whereby the processing or forwarding of personal data concerning you is based on your consent given in connection with the selection of cookies to be permitted.

The legal basis for this is Article 6 (1) (a) GDPR.

Within the scope of this service, data is therefore often transmitted to the USA because your browser establishes a connection to the Google servers when you start the Google Tag Manager. These are mainly located in the USA. Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, in the USA thereby obtains knowledge that your IP address was accessed via our websites. Because the USA is considered by the European Court of Justice to be a country with an insufficient level of data protection by EU standards, and in particular because there is a risk that your data will be processed by US authorities for control and monitoring purposes, possibly without any legal recourse, your consent is required. We have done our utmost to protect your personal data through appropriate technical and organizational measures.

The legal basis for this is Article 6 (1) (a) GDPR.

Please note that you have the right to revoke your consent at any time with effect for the future. To do so, reopen the cookie banner by clicking the button on our websites or reset your browser settings. By doing the latter, the cookie banner will be reopened when you visit the websites again and you can change your previously made settings. The use of cookies can also be generally deactivated in your browser settings. You can select the browser settings so that the storage of cookies is prevented. In this case, however, you will be asked each time you use the website whether you agree to the setting of cookies. Please note, however, that if you reject the personalization cookies, you may no longer be able



to use all the functionalities of the site. In addition, you can delete the cookies already set at any time using your browser settings. To do this, use the help function of your browser and follow the instructions.

The terms of use of the Google Tag Manager and additional information can be found here:

<https://marketingplatform.google.com/intl/de/about/analytics/tag-manager/use-policy>

<https://support.google.com/tagmanager>

#### **3.1.2.1.9. LinkedIn**

The individual companies of the MM Group use the social and business media platform LinkedIn to publish job offers, to communicate with you and to operate their own fan pages. On these fan pages, we provide insights into our Group, inform you about the activities of our business and advertise our services.

Consequently, we have a data processing agreement with LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland, which you can access here:

<https://www.linkedin.com/legal/l/dpa>

The legal basis for uploading or processing personal data on LinkedIn is your consent. If we publish photos, videos, names and other personal data of individuals, this is done on the basis of explicit consent. The legal basis for this is Article 6 (1) (a) GDPR.

However, in some cases we also rely on a contractual agreement or our overriding legitimate interest. The legal basis for this is Article 6 (1) (b) or (f) GDPR.

If you visit a LinkedIn website yourself and are located within the European Union or the European Economic Area or Switzerland, LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland, is the controller for the processing of your personal data within the meaning of Article 4 (1) (7) GDPR. If you are located outside of these countries, LinkedIn Corporation, 209 Stierlin Court, Mountain View, CA 94043, USA, is responsible for your personal data.

LinkedIn logs your usage data not only when you visit or otherwise use its services, including websites and apps, but also, for example, when you view content or ads outside of LinkedIn websites and apps, perform a search, install or update a mobile app, share articles or apply for a job. Your data is collected in particular through cookies, but also through other similar technologies. LinkedIn's goal is to recognise you and your device inside and outside of and across different services and devices. In some cases, LinkedIn therefore also collects information about your device even though you have not used the LinkedIn services or do not have a LinkedIn account. If you are a LinkedIn member, your login data, cookies, device information and IP addresses are also always collected. Again, the goal is to log your usage and to identify you as a user. However, you can also refuse the use of cookies and similar technologies that track your behaviour on other websites for targeting and other advertising purposes. This applies regardless of whether you are a LinkedIn member or not. To do this, use the following link:

<https://www.linkedin.com/mypreferences/g/guest-cookies>



In addition, if you are a LinkedIn member, you can also log in to the LinkedIn platform and manage your ad settings via the LinkedIn Ads Settings feature and define the data that is collected about you. For members who have not logged into LinkedIn, the LinkedIn cookie is not present, so specific identification is not possible, although your device information and IP addresses are still collected.

Registered members of LinkedIn also have the option to actively opt out of LinkedIn conversion tracking. To do this, use the following link to block cookies and, if necessary, also delete them subsequently. You can also deactivate the demographic characteristics:

<https://www.linkedin.com/psettings/advertising>

You can activate the LinkedIn cookie to reject advertising by clicking on the following link:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

Unfortunately, we have only limited possibilities to influence the data processing carried out by LinkedIn itself. LinkedIn operates its own IT infrastructure, has its own data protection regulations and, if you are a user of this platform and have an account, has an independent contractual relationship with you. LinkedIn is solely responsible for processing the personal data of your user profile and we have no influence on this. However, the information you publish in your profile, for example information on education, professional experience and knowledge, but also photos and locations, remains up to you. Please refer to the following data protection information for the purpose and scope of data processing at LinkedIn as well as information on the rights to which you are entitled and setting options for protecting your personal data:

<https://www.linkedin.com/legal/privacy-policy>

<https://de.linkedin.com/legal/cookie-policy>

<https://www.linkedin.com/help/lms/answer/85787>

<https://www.linkedin.com/help/linkedin/answer/a1444756>

You can contact LinkedIn's data protection officer via the following link:

<https://www.linkedin.com/help/linkedin/ask/TSO-DPO>

Independently of this, LinkedIn enables us to obtain a wide range of statistics based on visits to our site or the behaviour of individual users for the purpose of optimizing the marketing of our activities. The information obtained in this way enables us to optimize our services, develop functions and, in particular, provide targeted content on LinkedIn itself. We can use filters or parameterizations to define the criteria according to which these statistics are to be created and retrieve a wide variety of data about our target group. Although these visitor statistics are only transmitted to MM Group in anonymized form, the compilation of these statistics is based on the prior collection of cookies set by LinkedIn on the computer or any other device of the persons who have visited this site. Because we are involved in deciding the purposes and means of processing the personal data of the visitors to our fan pages on the basis of this parameterization carried out, the MM Group is jointly responsible with the respective LinkedIn company for this specific processing operation under data protection law. In the context of this processing activity,



LinkedIn and the MM Group are therefore joint controllers within the meaning of Article 26 GDPR.

Accordingly, a joint data processing agreement has been concluded with LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland, which you can access here:

<https://legal.linkedin.com/pages-joint-controller-addendum>

This special data processing is based on our legitimate interest in obtaining anonymous statistics and evaluations regarding the use of our websites and social media fan pages. The target group-oriented control of our advertisements and websites is a legitimate interest of our company. If you wish to assert your data subject rights, we will forward them to LinkedIn in accordance with the agreement concluded.

The legal basis for this is Article 6 (1) (f) GDPR.

If a transfer of your personal data to LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA, takes place, this transfer is justified by the conclusion of standard contractual clauses between the two LinkedIn companies. You can find more information here:

<https://www.linkedin.com/help/linkedin/answer/a1343190>

In addition, a social plugin from LinkedIn (Insight Tag/Counting Pixel/WebBeacon) is placed on our websites. This is a graphic exactly one pixel in size that is used for tracking user data. This plugin is marked with the small LinkedIn logo. If you click on the LinkedIn symbol on our websites, you will automatically be redirected to LinkedIn. With the help of the pixel integrated by this provider, it is thereby possible to determine the visitors to our websites as a target group for the display of ads on LinkedIn. The insight tag is used for statistical and marketing purposes. When a user calls up a website, the pixel is loaded. Pixel tags can be used to analyse information such as visitor traffic on the pages of our websites. This pseudonymous information may also be stored in cookies on the user's device and may contain, among other things, technical information about the browser and operating system, referring websites, time of visit and other information about the use of our online offer, as well as being linked to such information from other sources.

By activating the statistics cookies in your cookie settings, LinkedIn receives information that you have accessed our websites. This information may be used by LinkedIn for advertising, market research and display purposes. This applies when the cookie is activated even if you are not a LinkedIn member or were logged out of LinkedIn at the time you visit our websites. The information is transmitted by the browser directly to a LinkedIn server and stored there. If you are also a LinkedIn member, this information is used to optimize the advertisements we place on LinkedIn. These are displayed in particular to users who have shown an interest in our online offer. The LinkedIn pixel is integrated directly when you call up our websites, which is why LinkedIn can save a cookie on your device. If you subsequently log in to LinkedIn or visit LinkedIn while logged in, the visit to our online offer is read out of the cookie by LinkedIn and noted in your user profile there. Your data is therefore stored and processed by LinkedIn so that a connection to the respective user profile is possible and this data can be used for market research and advertising purposes. For this purpose, LinkedIn creates usage, interest and relationship profiles. However, the data collected about you is anonymous for us, so it does not allow us to draw any conclusions about the identity of the user. Nevertheless, with the help of the pixel we can track the effectiveness of advertisements for statistical and market research purposes by seeing whether visitors



were redirected to our websites via a LinkedIn advertisement (so-called "conversion tracking"). We may also share certain data about our users with the provider on an aggregated basis (so-called "custom audiences"). However, this also only takes place with your consent.

Therefore, if you visit our websites and have consented to the use of statistical cookies, we are jointly responsible with the provider LinkedIn for the associated processing activities. LinkedIn and the MM group are joint controllers within the meaning of Article 26 GDPR.

Reference should be made to the joint data processing agreement concluded with LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland:

<https://legal.linkedin.com/pages-joint-controller-addendum>

The use of the LinkedIn plugin is based on your consent given in connection with the selection of the cookies to be allowed. Without this consent, the plugin remains inactive, which is why no connection is established with the LinkedIn social network.

The legal basis for this is Article 6 (1) (a) GDPR.

Your consent also includes a possible transfer of your personal data to LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. However, the USA is considered by the European Court of Justice to be a country with an insufficient level of data protection according to EU standards. In particular, there is a risk that your data may be processed by US authorities or secret services for control and monitoring purposes, possibly without any legal remedy.

The legal basis for this is Article 6 (1) (a) GDPR.

Please note that you have the right to revoke your consent at any time with effect for the future. To do so, reopen the cookie banner by clicking the button on our websites or reset your browser settings. By doing the latter, the cookie banner will be reopened when you visit the websites again and you can change your previously made settings. The use of cookies can also be generally deactivated in your browser settings. You can select the browser settings so that the storage of cookies is prevented. In this case, however, you will be asked each time you use the website whether you agree to the setting of cookies. Please note, however, that if you reject the personalization cookies, you may no longer be able to use all the functionalities of the site. In addition, you can delete the cookies already set at any time using your browser settings. To do this, use the help function of your browser and follow the instructions.

Regardless of this, we do everything in our power to protect your personal data through appropriate technical and organisational measures. For example, the information collected through the LinkedIn plugin about the use of our websites is encrypted. Furthermore, this transfer to the USA is justified under data protection law by the conclusion of standard contractual clauses between the two LinkedIn companies. You can find more information here:

<https://www.linkedin.com/help/linkedin/answer/a1343190>



#### **3.1.2.1.10. Links**

Our websites use external links, i.e. links to other websites. When you click on these, your personal data is shared with the corresponding external website. Once you leave the MM Group websites, the processing of your personal data is not controlled by us, nor is it subject of this privacy information. Clicking on external links is voluntary. Therefore, if you do not want your personal data to be transmitted or processed in this way, do not open any of these links.

#### **3.1.2.2. Contact form and communication**

In the course of using the contact forms embedded on our websites, we process personal data in order to communicate with you and to be able to respond to your concerns, wishes and complaints. On the one hand, we process data that is absolutely necessary for communication. On the other hand, we store the data you voluntarily disclose to us in the contact form. The disclosure of the information marked as mandatory in the contact form is necessary for the communication and completion of your request. Therefore, the processing of this data is in our overriding interest. On the other hand, also those data are processed that are technically mandatory for the provision and display of the form for contacting and communicating. These are in particular IP address, browser type, browser version, browser language, operating system, etc. The processing of this personal data is mandatory, otherwise the websites and contact forms cannot function properly or be displayed. We therefore have an overriding interest in the processing of this data. It is absolutely necessary for the processing of the request. The processing of the personal data provided by you in the text field of the contact form is always based on your voluntary disclosure, which is why you will not face any negative consequences if you decide not to provide it. In individual cases, it is possible that your personal data disclosed in the contact form must be forwarded to the specifically responsible company of the MM Group for the purpose of processing your inquiry.

The legal basis for this is Article 6 (1) (b) and (f) GDPR.

#### **3.1.2.3. Applications via the application portal**

In order to be able to operate the application portal expediently, it is mandatory to process the data that is technically necessary for the use of the website or the portal. This includes, for example, information on the IP address, browser type and operating system, but also cookies in particular. If you create an account and use the application portal on our website, we process this technically necessary data. In addition, for the purposes of the technical processing of the application process, it is necessary to process all information and documents provided by you via the application portal in digital form, including the personal data contained therein. We have a legitimate interest in processing your personal data in the course of providing the portal, otherwise the application process cannot be offered in digital form. You can find more detailed information in the data protection information for applicants, which is available on the application portal.

The legal basis for this is Article 6 (1) (f) GDPR.

#### **3.1.2.4. Sending annual reports, press releases and other corporate publications**

You can order corporate publications of Mayr-Melnhof Karton Aktiengesellschaft, which you will receive in the way you choose, either by e-mail or by post. There is also the possibility to put your name on our



mailing list for ongoing press releases. To receive these corporate publications, it is sufficient to provide your last name and e-mail address. If you wish to receive our annual reports by post, it is also necessary to provide your postal address. The processing of this personal data is indispensable because otherwise the requested information cannot be delivered. The decision as to whether you wish to receive these annual reports, press releases and other publications of Mayr-Melnhof Karton Aktiengesellschaft is always voluntary, which is why you will not suffer any disadvantages should you decide not to do so. You can unsubscribe at any time by simply replying to the e-mail received. If you receive the documents by post, please contact us directly. You can use the contact form on our websites or contact us directly by e-mail ([investor.relations@mm.group](mailto:investor.relations@mm.group)). Moreover, we also process those data that are absolutely necessary for the provision of the registration form and for technical processing. These are in particular IP address, browser type, browser version, browser language, operating system, etc.

The legal basis for this is Article 6 (1) (b) and (f) GDPR.

#### **3.1.2.5. Sending newsletters, journals and magazines**

If you have expressly consented to receive our newsletters or company magazines, we will use your e-mail address to send you these documents. In order to receive them, you must provide an e-mail address as well as your first name, surname and company name. Without the disclosure of this data, the requested documents cannot be sent. However, if you also wish to inform us of your desired form of address or your areas of interest in connection with our newsletters, journals and magazines, we will also process this personal data. If you wish to receive these documents by post, it is also necessary to provide your postal address, otherwise it will not be possible to send the documents by post. In some cases, it is mandatory to make a desired language selection, because otherwise it is not possible to send the documents in the language that suits you. We therefore have a legitimate interest in processing this personal data. You can unsubscribe from the newsletter or company magazines and journals at any time, for example via a link at the end of each e-mail. For postal deliveries, please contact us directly. For this purpose, you can use the contact form on our websites or contact us directly by e-mail ([marketing-boardpaper@mm.group](mailto:marketing-boardpaper@mm.group) for documents of MM BOARD & PAPER GmbH or [marketing-packaging@mm.group](mailto:marketing-packaging@mm.group) for documents of MM PACKAGING GmbH). Moreover, we also process those data that are absolutely necessary for the provision of the registration form and for technical processing. These are in particular IP address, browser type, browser version, browser language, operating system, etc.

The legal basis for this is Article 6 (1) (b) or (f) GDPR.

In the case of existing customers, we may also send advertising and information material for similar products or services without first obtaining your consent to send the documents. This is done within the framework of the applicable competition law regulations. Our legitimate interest lies in the implementation of marketing and sales measures. You can object to this processing at any time.

The legal basis for this is Article 6 (1) (f) GDPR.

Please note that our digitally sent newsletters contain a so-called Insight Tag/Pixel/WebBeacon, i.e. a pixel-sized file that is retrieved from the server of our dispatch service provider when the newsletter is opened. As part of this retrieval, technical information is initially collected, such as information on the browser used and your system, but also your IP address and the time of retrieval. This information is used



for the technical improvement of the services. It is used to target specific groups, because your IP address can be used to analyse your retrieval locations and access times and to determine your reading usage. The statistical surveys also include the determination of whether and when you open newsletters and which links you click on. The analyses are therefore used to identify the reading habits of users so that our content can be adapted to your interests.

We base this additional processing on Article 6 (1) (f) GDPR. Our legitimate interest is the improvement of target group-oriented marketing.

#### **3.1.2.6. Whistleblowing system (Whistleblower hotline)**

MM Service GmbH operates a whistleblowing system within the meaning of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, which is called "MM Integrity Line".

We need to process certain technical data in order to operate the whistleblower system embedded on our websites. This includes, for example, information about the type of browser you are using, the browser version, the browser language, the operating system, etc. The processing of this personal data is mandatory, otherwise the whistleblower system will not function properly or cannot be displayed on your end devices. We have a sufficient interest in processing this data for the purposes of the technical operation of the whistleblowing system.

The legal basis for this is Article 6 (1) (f) GDPR.

The whistleblower system enables you to contact the MM Group and report indications of compliance and legal violations. You can quickly and easily notify us of circumstances or behavior that you consider to be misconduct, a violation of the law or a breach of our Code of Conduct.

The whistleblower system includes the option of anonymously submitting tips via an encrypted connection. However, if you submit a report to us, you also have the option to create a secure mailbox and thus be available for further inquiries. In this case, you will be assigned a case number and you will need to choose a password (PIN). The case number and password (PIN) are used to give you protected access to this anonymous mailbox and to check whether you have received any queries from us. Anonymous communication is possible because your IP address and location are not stored at any time during this use. Your anonymity is guaranteed throughout the entire process. However, we also maintain other technical measures to ensure data protection and confidentiality. For example, the data you provide is stored on a specially secured database of our processor and is encrypted according to the current state of the art. If you would like to ensure your anonymity by additional means, we recommend that you do not use a computer, laptop or cell phone belonging to the MM Group to submit the report. In addition, do not use any terminal device that is connected to the MM Group company network or intranet. In addition, only call up the whistleblowing system by directly entering the URL address in the browser and not by clicking on a link.

It is also possible for a whistleblower to use the whistleblowing system without providing any personal data, i.e. anonymously. However, you can voluntarily disclose your personal data at any time as part of the whistleblowing process, in particular information about your identity, first and last name, country of residence, telephone number or e-mail address. The corresponding processing of this personal data



voluntarily disclosed by you is based on our overriding legitimate interest, because it is used to review the report made via the whistleblower system and to investigate the alleged compliance and legal violations. However, because the decision to do so is always voluntary, you will not face any negative consequences if you choose not to do so.

The legal basis for this is Article 6 (1) (f) GDPR.

In principle, we do not ask for or process any special categories of personal data. You will not be asked to disclose sensitive data such as those relating to racial and ethnic origin, political opinion, religious or ideological beliefs, trade union membership, health or sexual orientation. However, due to free text fields in the registration form, such special categories about your person can be submitted by yourself on a voluntary basis. This disclosure will be considered as consent to data processing. However, you will not suffer any negative consequences if you decide not to give your consent. In addition, you have the right to revoke your consent with effect for the future. If no other legal basis for data processing exists, we will then no longer process your personal data.

The legal basis for this is Article 9 (2) (a) GDPR.

The facts reported by the whistleblower may contain personal data of third parties. It is not excluded that a report also includes information about other persons. The personal data provided will be processed to verify the report made via the whistleblower system and to investigate the alleged compliance and legal violations.

Personal data of the whistleblower as well as those of the data subjects and other involved persons are thus also processed by us because this is necessary for the performance of a task that is in the public interest and has been assigned to us. The legal basis for the data processing necessary in connection with the operation of the whistleblower system can be found in Directive (EU) of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report infringements of Union law (Directive (EU) 2019/1937) and in the national legislation adopted on the basis thereof.

The legal basis for this is Article 6 (1) (e) GDPR.

However, the processing of this personal data is also based on legal obligations. For example, we are subject to documentation, storage and logging obligations as well as an obligation to report facts relevant under criminal, competition and labor law to competent authorities and courts.

The legal basis for this is Article 6 (1) (c) GDPR.

Finally, the processing of the whistleblower's personal data as well as the data subjects and other persons involved is also carried out to protect our legitimate interests. We have a legitimate interest in the processing of this personal data because it serves the prevention and detection of breaches within our group companies, the review of internal processes for their lawfulness, the preservation of the integrity of the group of companies, but also to demonstrate that we comply with our obligations under Directive (EU) 2019/1937 and the respective national legislation.

The legal basis for this is Article 6 (1) (f) GDPR.



If the reported facts include special categories of personal data and these are not handed over voluntarily, they will be deleted immediately, unless the processing relates to personal data that the data subject has already made public beforehand. The same applies if the processing is absolutely necessary for reasons of substantial public interest as well as to achieve the purposes of the whistleblower system and extensive measures are taken to protect the rights and freedoms of the persons involved.

The legal basis for this is Article 9 (2) (e) GDPR or Article 9 (2) (g) GDPR.

Under certain circumstances, we also process personal data on acts or omissions that are punishable by court or administrative authorities, in particular also on suspicion of the commission of criminal acts, as well as on criminal convictions or preventive measures, if the facts brought to our attention by means of the whistleblower system include such information that is relevant under criminal law.

The legal basis for this is Article 10 (1) GDPR in conjunction with Article 6 (1) (e) GDPR.

### **3.1.3. Categories of recipients**

The companies of the MM Group will only share your personal data processed in connection with the operation of the websites and their extended functions if this is necessary for the above-mentioned purposes. We may share your data with service providers that support us in connection with the administration, operation and technical support of the websites or their functions. These include, in particular, IT service providers and maintenance companies, web analytics services as well as providers of surveys, studies and statistics, search engine operators, media or advertising agencies, social media platforms, print shops and call center operators. However, we also use the services of web hosting providers in particular to provide our website. They store our websites on web servers, which means that they can be accessed worldwide via the Internet. The technical implementation of the whistleblower system is also carried out on our behalf by a contracted IT service provider. Furthermore, your personal data will be shared within the MM Group between affiliated companies if this is absolutely necessary for the stated purposes. Under certain circumstances, we may also be required by law or in the context of official or procedural proceedings to disclose your personal data to authorities or courts. In the event of unlawful use of this website, your data may therefore also be disclosed to the relevant authorities or courts and to law firms. If these recipients are data processors under data protection law, extensive data processing agreements have been concluded.

### **3.1.4. Transfer to entities outside the EEA**

The MM Group is a globally acting group, so that your personal data processed in connection with the use of these websites may have to be transferred to third countries that do not have an adequate level of data protection according to European data protection law. The receiving entities may be group-owned companies as well as third parties located outside the European Economic Area (EEA). If there is no adequacy decision by the European Commission for the country of the recipient, we predominantly use binding EU standard contractual clauses to ensure appropriate data protection guarantees and an adequate level of data protection. In individual cases, the transfer of your personal data also takes place on the basis of the exemptions for certain cases pursuant to Article 49 GDPR, such as your consent pursuant to Article 49 (1) (a) in conjunction with Article 6 (1) (a) GDPR. We have done everything possible to protect your personal data through appropriate technical and organizational measures. Please note that you have the right to revoke your consent at any time with effect for the future. Where IT service



providers offer us the option of processing data on servers or in data centers within the EU or EEA, we have made this choice. In this way, we want to ensure that your data is stored within the EU or EEA and that access by US authorities is excluded as far as possible.

### **3.1.5. Storage period**

As a matter of principle, we store your personal data collected in the course of using the websites only as long as it is necessary for the stated purposes, i.e. the provision of the websites and their functions, the convenience settings, the display of personalized content, communication based on your contact, the processing of applications via the application portal, the sending of annual reports, press releases and other publications, the operation of the whistleblowing system and the compilation of anonymous statistics. In addition, we only process your personal data as long as required by statutory retention obligations or for the duration of any limitation periods if we need the data for legal enforcement or defense. Legal retention and documentation obligations arise, for instance, from compensation or corporate law. Insofar as storage of our server log files is therefore not required for evidentiary purposes, they will be deleted after thirty days. Longer storage only takes place insofar as this is necessary to investigate attacks on our websites or to pursue legal claims. The log files of interactions, errors, etc. of the editorial system and the personal data of the users of the content management system stored therein are anonymized after ninety days and finally removed after 180 days. The Google Analytics application, in turn, allows the selection of a wide variety of storage durations. We have currently selected a retention period of 26 months. Please refer to the list above for the storage duration of the individual cookies. In connection with the whistleblower system, personal data is stored as long as it is necessary to process your whistleblower or as long as we have a legitimate interest in storing your personal data. However, storage will in any case take place as long as the retention obligations created by the European or national legislator provide for it. In addition, your personal data processed in this system shall be retained as long as it is necessary to carry out administrative or judicial proceedings that have already been initiated or an investigative procedure. If the data processing is based exclusively on your consent, the data will be stored until this consent is revoked, but no longer than is necessary to achieve the specific purpose. Instead of deleting your data, however, we also have the option of anonymizing your data. In this case, any personal reference will be irrevocably removed.

## **3.2. Shareholders**

### **3.2.1. General provisions**

Mayr-Melnhof Karton Aktiengesellschaft is listed on the stock exchange. In the following, we provide an overview of how it processes the personal data of its shareholders.

### **3.2.2. Purposes and legal basis**

Mayr-Melnhof Karton Aktiengesellschaft processes personal data of shareholders, in particular those pursuant to Section 10a (2) of the Austrian Stock Corporation Act (AktG). This concerns the name, address, date of birth, number of the security deposit account, number of shares of the shareholder, if applicable also the class of shares, the number of the voting card as well as the name and date of birth of authorized persons. We receive this data directly from the persons concerned or, on their instruction, from banks, insofar as these manage their security deposit accounts. The processing of personal data of shareholders or their representatives is mandatory for participation in the Annual General Meeting and



its execution in accordance with the Austrian Stock Corporation Act. This also includes the handling of communications. The purpose is to enable shareholders or their representatives to participate and exercise their rights within the framework of the Annual General Meeting. This may also include the use of video conferencing systems. We have an overriding interest in processing this personal data for the aforementioned purposes.

The legal basis for this is Article 6 (1) (b), (c) and (f) GDPR.

### **3.2.3. Categories of recipients**

For the purpose of organizing the Annual General Meeting, Mayr-Melnhof Karton Aktiengesellschaft uses external service providers, such as notaries, lawyers, banks and IT service providers. However, these companies only receive personal data from us that is absolutely necessary for the execution of the commissioned service. If you participate in the Annual General Meeting as a shareholder, all shareholders present or their representatives, the members of the Management Board and the Supervisory Board, the notary and all other persons with a legal right to participate may inspect the legally required list of participants pursuant to Section 117 of the Austrian Stock Corporation Act (AktG) and thereby also inspect the personal data stated therein, such as your name, your place of residence, your shareholding relationship, etc. Mayr-Melnhof Karton Aktiengesellschaft is also legally obligated pursuant to Section 120 of the Austrian Stock Corporation Act (AktG) to submit personal shareholder data, in particular the list of participants as part of the notarial record of the Annual General Meeting, to the Company Register. In addition, we also disclose your personal data in individual cases to selected companies or professional groups for the purposes of consulting services, audit assignments or legal support in connection with financing transactions. This is in our overriding interest. Of course, only suitable service providers are selected for this purpose and sufficient data protection precautions are taken. Under certain circumstances, we may also be required by law or in the context of official or procedural proceedings to disclose your personal data to authorities or courts. In the event of legal violations or breaches of the contractual relationship, it may also be necessary to disclose your data not only to authorities or courts, but also to law firms. If these recipients are data processors under data protection law, extensive data processing agreements have been concluded.

### **3.2.4. Transfer to entities outside the EEA**

The individual companies of the MM Group do not transfer your personal data outside the EEA. However, MM Group is a globally acting group, so that your personal data processed in connection with the organization of the Annual General Meeting may be accessible to persons in third countries that do not have an adequate level of data protection according to European data protection law. All shareholders present or their representatives as well as all other persons with a legal right to participate may inspect the legally required list of participants pursuant to Section 117 of the Austrian Stock Corporation Act (AktG), which is why your personal data mentioned therein, such as your name, place of residence, shareholding, etc., may in principle also be inspected by persons outside the EEA. Mayr-Melnhof Karton Aktiengesellschaft is also required by law pursuant to Section 120 of the Austrian Stock Corporation Act (AktG) to submit personal shareholder data, such as in particular the list of participants, as part of the notarial record to the Company Register, which can be viewed worldwide as an electronically maintained public register.

### **3.2.5. Storage period**

Unless other legal obligations require deletion, all shareholder data will be anonymized or deleted at the time when it is no longer necessary for the purposes for which it was collected or processed. Verification and retention obligations arise in particular from corporate, stock corporation and takeover law, from tax and duty law and from money laundering regulations. In connection with the clarification and enforcement of claims, data may be stored in individual cases, possibly also in connection with legal proceedings, for the duration of the statute of limitations plus the duration of the legal proceedings until their legally binding conclusion.

### **3.3. Business and contractual partner**

#### **3.3.1. General provisions**

The individual companies of the MM Group process personal data of their business and contractual partners. In the following, we provide an overview of how personal data of customers, suppliers, service providers and other business or contractual partners are processed. This information is intended for business and contractual partners who are natural persons or employees of such persons if they are legal entities.

#### **3.3.2. Purposes and legal basis**

We process the data disclosed by you for the purpose of implementing the business or contractual relationship, i.e. based on the necessity of data processing for the fulfillment of contractual obligations. This includes in particular the processing of your contact data as well as the business-specific order data for purposes of communication, planning, administration and processing of the business relationship.

The legal basis for this is Article 6 (1) (b) GDPR.

However, we also process your personal data for the purpose of fulfilling legal obligations.

The legal basis for this is Article 6 (1) (c) GDPR.

In both cases, the provision of your personal data is required by law or contract, so that failure to provide it may have legal consequences or the contractual obligations cannot be met.

If such necessity does not exist, the processing of your personal data may also be based on our overriding legitimate interests in certain cases. However, this only applies if your privacy interest does not outweigh our interests. We have a legitimate interest in processing your personal data in the course of the business relationship. The relevant interests of our company are those relating to the performance of the contract, internal administrative purposes, operating and facilitating communication, improving processes and organization, general security and protection of assets, technical provision of IT solutions, IT security, and initiating, maintaining and managing relationships with our business partners. Your contact information is therefore also used for marketing purposes, for sending advertising, e-mails, newsletters and invitations to participate voluntarily in customer satisfaction surveys and for the transmission of technical and legal information. If we receive your contact details in connection with the sale of a product or service, we may therefore use them for advertising purposes in connection with similar products or



goods. You can object to this processing at any time. Furthermore, we also process those data that are technically mandatory for the provision of IT solutions. These are, in particular, your IP address, browser type, browser version, browser language, operating system, etc. We have a legitimate interest in processing your personal data for such purposes in the course of the employment relationship.

The legal basis for this is Article 6 (1) (f) GDPR.

In individual cases, however, the processing of your personal data may also be based on your consent. In these cases we expressly point this out and ask for your consent. The decision to do so is always voluntary, which is why you will not meet any negative consequences if you decide against it. If the processing is based on your consent, you also have the right to withdraw your consent with effect for the future.

The legal basis for this is Article 6 (1) (a) GDPR.

### **3.3.3. Categories of recipients**

The individual companies of the MM Group only share your personal data processed in connection with the business relationship if this is necessary for the above-mentioned purposes, i.e. in particular for the processing of the business in question. However, we may also share your data with service providers who support us in connection with the administration or technical support of IT sales solutions or in the area of marketing and other promotional activities. We will only transfer your data to third party service providers if this is necessary to fulfill our tasks. However, the individual companies of the MM Group may also make your personal data available to affiliated companies if this is necessary for the stated purposes. Under certain circumstances, we may also be required by law or in the context of official or procedural proceedings to disclose your personal data to authorities or courts. In the event of legal violations or breaches of the business or contractual relationship, it may also be necessary to disclose your data not only to authorities or courts, but also to law firms. If these recipients are data processors under data protection law, extensive data processing agreements have been concluded.

### **3.3.4. Transfer to entities outside the EEA**

The MM Group is a globally acting group, so that your personal data processed in connection with the respective business relationship may have to be transferred to third countries that do not have an adequate level of data protection according to European data protection law. The receiving entities may be group-owned companies as well as third parties. If there is no adequacy decision by the European Commission for the country of the recipient, we predominantly use binding EU standard contractual clauses to ensure appropriate data protection guarantees and an adequate level of data protection.

### **3.3.5. Storage period**

As a matter of principle, we only store your personal data as long as it is required for the stated purposes, i.e. the processing of the business or contractual relationship. However, we also process your personal data as long as required by statutory retention obligations or for the duration of any limitation periods if we need the data for legal enforcement or defense. If the data processing is based on your consent, the data will be stored until this consent is revoked, but for no longer than is necessary to achieve the specific purpose.



### **3.4. Video surveillance and access control systems**

#### **3.4.1. General provisions**

Some companies of the MM Group operate video and building surveillance systems as well as electronic access control systems. In the following, we provide an overview of how these video, image and sound recordings, as well as other personal data required for this purpose, are handled by the respective responsible company. This information is intended for all persons who are within the scope of these control systems or who use them, irrespective of whether they are employees, applicants, suppliers, customers or visitors.

#### **3.4.2. Purposes and legal basis**

We process the image and sound material relating to you as well as your access data exclusively for the purposes of building and plant security and access control. We have a legitimate interest in processing your personal data for these purposes. The processing serves to maintain general security in the company, i.e. not only production and information security, but also the security of the workforce against attacks of any kind. Due to the security-specific purpose of the processing, the limited recording area of the video surveillance, the few persons authorized to access this data and the storage limitation to the necessary extent, our company-related interests prevail.

The legal basis for this is Article 6 (1) (f) GDPR.

#### **3.4.3. Categories of recipients**

The individual companies of the MM Group only share your personal data processed in connection with the operation of the video and building surveillance systems as well as the electronic access control systems if this is absolutely necessary. We may share this data with IT service providers who assist us in connection with the technical setup or maintenance of these systems. However, the individual companies of the MM Group may also share your personal data with affiliated companies if this is necessary for the stated purposes. Under certain circumstances, we may also be required by law or in the context of official or procedural proceedings to transmit image or sound recordings made by you or access data to public authorities. Furthermore, in the event of legal violations or other punishable acts, we may transmit this data to competent courts or other public authorities, but also to law firms. If these recipients are data processors under data protection law, extensive data processing agreements have been concluded.

#### **3.4.4. Transfer to entities outside the EEA**

The MM Group is a globally operating group, which means that your personal data processed in connection with video and building surveillance systems as well as electronic access control systems may be transferred to third countries that do not have an adequate level of data protection according to European data protection law. The receiving entities may be Group companies as well as third parties. If there is no adequacy decision by the European Commission for the country of the recipient, we predominantly use binding EU standard contractual clauses to ensure appropriate data protection guarantees and an adequate level of data protection.



#### **3.4.5. Storage period**

As a matter of principle, we only store your personal data as long as it is required for the aforementioned purposes, i.e. building and plant security and access control. In addition, we process your personal data as long as required by statutory retention obligations or for the duration of any limitation periods if we need the data for legal enforcement or defense.

### **3.5. Visitor management**

#### **3.5.1. General provisions**

Some companies of the MM Group collect personal data from you before you can be granted access to the respective sites. In the following, we provide an overview of how this personal data, which you must disclose before entering these facilities, is handled.

#### **3.5.2. Purposes and legal basis**

We process the data concerning you exclusively for the purposes of building and plant security and access control. We have a legitimate interest in processing your personal data for these purposes. The processing serves to maintain general security in the company, i.e. not only production and information security, but also the security of the workforce against attacks of any kind. Due to the security-specific purpose of the processing, the few persons authorized to access the data and the storage of this data being limited to the necessary extent, our company-related interests prevail.

The legal basis for this is Article 6 (1) (f) GDPR.

#### **3.5.3. Categories of recipients**

The individual companies of the MM Group only share your personal data processed in connection with visitor control if this is absolutely necessary. We may share this data with service providers who assist us in connection with the technical setup or maintenance of these systems. However, the individual companies of the MM Group may also share your personal data with affiliated companies if this is necessary for the stated purposes. Under certain circumstances, we may also be required by law or as part of official or procedural procedures to disclose data collected from you to public authorities. Furthermore, in the event of legal violations or other punishable acts, we may transmit this data to competent courts or other public authorities, but also to law firms. If these recipients are data processors under data protection law, extensive data processing agreements have been concluded.

#### **3.5.4. Transfer to entities outside the EEA**

MM Group is a globally acting group, so that your personal data processed in connection with visitor control may sometimes be transferred to third countries that do not have an adequate level of data protection according to European data protection law. The receiving entities may be group-owned companies as well as third parties. If there is no adequacy decision by the European Commission for the country of the recipient, we predominantly use binding EU standard contractual clauses to ensure appropriate data protection guarantees and an adequate level of data protection.



### **3.5.5. Storage period**

As a matter of principle, we only store your personal data as long as it is required for the aforementioned purposes, i.e. building and plant security and access control. In addition, we process your personal data as long as required by statutory retention obligations or for the duration of any limitation periods if we need the data for legal enforcement or defense.

## **4. Rights of data subjects**

### **4.1. General provisions**

We try to make it as easy as possible for you to exercise your rights. Therefore, please always let us know in which form you would like to receive requested information. If you do not specify a request, we will respond to your request in the same form as your inquiry. As a rule, you will receive feedback within one month. This period may be extended by further two months if necessary, taking into account the complexity and number of requests. In such cases, we will inform you of any extension of the deadline within one month of receiving your request, together with the reasons for the delay. In the case of obviously unfounded or excessive requests, we are entitled to charge an appropriate fee or to reject your request. To exercise your rights, please contact the Group Data Privacy Officer and provide sufficient proof of your identity. If there is reasonable doubt about your identity, such as in the case of telephone inquiries, we reserve the right for data protection reasons to request additional information necessary to confirm your identity. In such cases, we may request a legible copy of one of your signed identity documents (passport, ID card, driver's license, etc.), which must also be signed by your own hand in case of more serious doubts. In such cases, please black out personal information that we do not need to identify you. Alternatively, you can always identify yourself using a qualified electronic signature (citizen card/digital signature/ID-Austria).

You have the following rights in relation to the processing of your personal data:

### **4.2. Right of access**

You have the right to know whether we process personal data relating to you. If we process personal data relating to you, you will receive information about this specific data. However, the right to information must not affect the rights and freedoms of other persons. Please refer to this privacy provisions for all other information relevant to the processing of your personal data, such as the legal basis, the purposes or the duration of the processing.

### **4.3. Right to rectification**

You have the right to request that we correct your personal data if it is incorrect, inaccurate or incomplete. The right to rectification also includes the right to completion through supplementary explanations or notifications. If we have disclosed or transferred data affected by this to other recipients, we will inform them of the correction made. An exception exists for those cases in which this proves impossible or involves a disproportionate effort. If this is the case, we will inform you of these recipients upon request.



#### **4.4. Right to erasure**

You have the right to request that we delete your personal data ("right to be forgotten") if the personal data is no longer necessary for the purposes for which it was collected or otherwise processed or if it was processed unlawfully. However, this only applies insofar as there is no other reason for retention. If you revoke your consent on which the processing was based and there is no other legal basis for the processing, your data will also be deleted. Deletion will also take place if you object to the processing and there are no overriding legitimate reasons for further processing. Deletion of your personal data will also take place if this is necessary for compliance with a legal obligation under Union or Member State law. If we have disclosed or transferred data affected by this to other recipients, we will inform them of the deletion that has taken place. If we have made your personal data public and we are obliged to erase it, we will take reasonable measures, including technical measures, taking into account the available technology and the costs of implementation, to inform data controllers who process your personal data that you require them to erase all links to your personal data or copies or replications of your personal data. An exception exists only for those cases in which this proves impossible or involves a disproportionate effort. If this is the case, we will inform you of these recipients upon request.

#### **4.5. Right to restriction**

You have the right to restrict the processing of your personal data. The restriction of processing is only possible in those cases in which the accuracy of your personal data is disputed, and for a period of time that allows us to verify the accuracy of your personal data. It is also possible if the processing is unlawful and you refuse the erasure of the personal data and instead request the restriction of the use of the personal data. The same applies if we no longer need your personal data for the purposes of processing, but you need it for the assertion, exercise or defense of legal claims or have objected to the processing as long as it has not yet been determined whether our legitimate grounds override your interests. If processing has been restricted, we will only process your personal data, apart from storing them, with your consent and for the assertion, exercise or defense of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or a Member State. If we have disclosed or transferred affected data to other recipients, we will inform them of the restriction that has been made. An exception exists for those cases in which this proves impossible or involves a disproportionate effort. If this is the case, we will inform you of these recipients upon request. If you have obtained a restriction of processing, you will be informed by us before the restriction is lifted.

#### **4.6. Right to data portability**

You have the right to request that the personal data concerning you be handed over in a structured, common and machine-readable data format. The right to data portability also includes the right to transfer the data to another data controller. As far as technically possible, we will therefore transfer your personal data directly to a controller to be named by you at your request. However, the right to data transfer only exists for data provided by you and requires that the processing is based on your consent or for the performance of a contract and is carried out with the help of automated processes. Moreover, the right to data portability must not affect the rights and freedoms of other persons.



#### **4.7. Right to object**

In the case of processing of your personal data for the performance of tasks in the public interest or for the exercise of our legitimate interests, you may object to the processing of personal data relating to you at any time with effect for the future due to reasons relating to your particular situation. We will then no longer process your personal data unless we can demonstrate compelling legitimate reasons for the processing that override your interests, rights and freedoms. Further processing is also possible in those cases where the processing serves the assertion, exercise or defense of our legal claims. In the case of data processing for direct marketing, you may object to the processing at any time, even if the above reasons do not apply.

#### **4.8. Right to withdraw your consent**

If the processing is based on your consent, you do not have the right to object by law, but you then have the right to revoke your consent at any time with effect for the future, so that you can achieve a result comparable to the objection by revoking.

#### **4.9. Right to lodge a complaint with the competent supervisory authority**

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority (data protection authority), in particular in the member state of your place of residence, place of work or the place of the alleged infringement, if you are of the opinion that the processing of personal data relating to you violates these legal requirements.

Regardless of the specific responsibility under data protection law of the individual companies of the MM Group or the member state of your place of residence, place of work or the place of the alleged infringement, we would like to provide you with the contact details of the data protection authority in whose country the head office or headquarters of the MM Group is located:

##### **AUSTRIAN DATA PROTECTION AUTHORITY**

Barichgasse 40-42  
1030 Vienna, Austria  
+43 (0)1 52 152 – 0  
[dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)