

	<b>POLICY</b>	Area	Bemis Global
	<b>Bemis Website Privacy and Cookie Policy</b>	Effective Date	09/01/2015
		Revision Letter	A
		Approver	VP IT & CIO

## 1.0 Purpose

Bemis and its Affiliated Companies ("Bemis" "we", "us", "our") value our relationship with our business partners and any party which may be interested in Bemis' business for any reason and we are committed to protecting their privacy. This Policy outlines the types of Personal Information collected on our Site(s), how this data is used and safeguarded as well as user rights related to Personal Information.

For ease of reference, please note that all capitalized terms that are not defined in the body of this Policy are defined in Section 4.0.

## 2.0 Scope

This Policy applies to all users of our Site(s).

## 3.0 Policy

3.1 **INFORMATION WE COLLECT** – Bemis will identify the types of Personal Information that may be collected via our Web Site(s). This information may be provided by the user voluntarily or collected by automated means.

3.1.1 **INFORMATION USERS PROVIDE TO US** – It is voluntary whether or not the user discloses personally identifiable information to us however, if the user elects not to do so, Bemis reserves the right not to register the user or provide them with any products or services.

Types of information the user may be asked/choose to provide:

- Name
- Mailing address
- E-mail address
- Telephone number
- Credit card Information
- Postal Code
- Purchase History
- Company
- Position

3.1.2 **INFORMATION PROVIDED TO US BY AUTOMATED MEANS** – Bemis may also collect certain information by automated means, such as cookies and web beacons, whenever a user visits our Site(s). The information collected by Bemis in this manner may include IP address, browser type, operating system, referring URL's, information on actions taken on a website and dates and times of website visits. The user may choose to not accept the use of these cookies by disabling them using the instructions below, following the 'opt-out' links provided or by changing their browser settings so that cookies from this website cannot be placed on their Device.

3.2 **COOKIES** – We use cookies, pixel tags, web beacons, and similar files or technologies to collect and store the information we automatically collect about the user's computer or mobile Device.

We use the term "cookies" in this Policy to refer to cookies and all such similar technologies that collect information automatically when users access our Site(s). For more information on Bemis Cookies please see here [insert link to the Cookie Statement attached at [Appendix 1](#)]

**3.3 HOW WE USE THE INFORMATION WE COLLECT** - Bemis uses the Personal Information we collect through our Site(s) for a variety of business purposes, including:

- To respond to user questions and requests
- To provide users with access to certain areas and features of our Site(s)
- To verify a user's identity
- To communicate with a user about their account and activities on our Site(s)
- To communicate, at our discretion, changes to this Policy
- To tailor content, advertisements, and offers we provide
- To develop new products and services
- To send users samples, premiums, products and information
- To process applications and transactions
- To offer job announcements and enable users to respond to them
- For purposes disclosed at the time the user provides Personal Information or otherwise with the user's consent

If the user provides Personal Information to us, either directly or through a reseller or other business partner, Bemis will:

- Not sell or rent it to a Third Party without the user's permission — although unless the user opts out, we may use their contact information to provide information we believe the user needs to know or may find useful
- Not use or disclose the information except:
  - As necessary to provide services or products the user has ordered
  - In other ways described in this Policy or to which the user has otherwise consented
  - In the aggregate with other information in such a way so that the user's identity cannot reasonably be determined (for example, statistical compilations)

**3.4 HOW WE MAY SHARE THE INFORMATION WE COLLECT** - We will not share, sell, license, trade or rent users' Personal Information to or with any Third Party (except as stated below) without the user's consent. We will share user information in the following ways:

- 3.4.1 *Our Third Party service providers, agents and distributors ("service providers"):*** We may share user information with our services providers who process user Personal Information to provide services to us or on our behalf (e.g., to assist us with the functioning of our Site(s)). We have contracts with our service providers that prohibit them from sharing the information about our users that they collect or that we provide to them with anyone else, or using it for other purposes.
- 3.4.2 *Companies within the Bemis Group of Companies: We may share user information*** with our affiliates, which are entities under common ownership or control of our ultimate parent company, Bemis Company, Inc.
- 3.4.3 *Fraud prevention:*** We may disclose the Personal Information we collect about our users when we believe disclosure is necessary to investigate, prevent, or respond to suspected illegal or fraudulent activity or to protect the safety, rights, or property of us, our users, or others.
- 3.4.4 *Law enforcement purposes:*** If requested or required by government authorities, such as law enforcement authorities, courts, or regulators, or otherwise to comply with the law, we may disclose any information we have about our users. We also may disclose

information collected about a user in order to exercise or protect legal rights or defend against legal claims.

- 3.4.5 **Sale or merger of our business:** We may transfer user Personal Information to a Third Party if we or any of our affiliates are involved in a corporate restructuring (e.g., a sale, merger, or other transfer of assets).
- 3.4.6 **Advertisers and advertising networks:** Advertisers and advertising networks place ads (including sponsored links in search results) on our Site(s).
- 3.5 **HOW WE PROTECT COLLECTED PERSONAL INFORMATION** - We take the security of our user's Personal Information seriously and use appropriate technical and organizational measures to protect their Personal Information against unauthorized or unlawful Processing and against accidental loss, destruction or damage. We also limit access to Personal Information about a user to employees who reasonably need access to it to provide products or services to users, or in order to do their jobs. However, because no security system can be 100% effective, we cannot completely guarantee the security of any information we may have collected from or about our users.
- 3.6 **HOW LONG WE RETAIN PERSONAL INFORMATION** - We retain the information we collect about and from users for as long as necessary to fulfil a business purpose or comply with a legal request. We may also choose to anonymize certain of the information provided to us so that it can no longer be attributed to a user if we would like to retain it for longer periods of time.
- 3.7 **COMPLIANCE WITH DATA PRIVACY REQUIREMENTS GLOBALLY** - Information we collect may be stored, Processed and/or transferred to the USA or to any other country or territory where one or more of our affiliated group companies or Third Party service providers are located or maintain facilities. A user's Personal Information may be transferred because our immediate parent company, Bemis Company, Inc., is located in the USA. While other territories may not have the same standards of data protection as those within the user's home country, we will continue to protect the Personal Information we transfer in accordance with this Privacy Policy.
- 3.7.1 **Policy Information on specific Data Privacy requirements outside of the USA**
- European Economic Area:** Where a user's Personal Information is transferred outside the European Economic Area, Bemis will ensure that any such transfer protects the legitimate interests of its users and, where required, will implement adequate measures, in line with Applicable Laws.
- 3.7.2 **Policy Information on specific Data Privacy requirements within the USA.**
- Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of Personal Information the business shares with Third Parties for direct marketing purposes by such Third Party and the identities of the Third Parties with whom the business has shared such information during the immediately preceding calendar year.
- 3.8 **USER RIGHTS REGARDING THEIR PERSONAL INFORMATION** - Users have the right to ask for a copy of any Personal Information that we hold about them in our records, to correct any inaccuracies and to update any out-of-date information. They also have the right to object, on legitimate grounds, to the Processing of their Personal Information, unless the Processing is authorized by law or by a decision of the competent Data Protection Authority. Users can also ask us not to send them direct marketing communications (however please note that we may continue to send service related (i.e. non-marketing) communications). If a user wishes to exercise any of these rights, or wishes to object to our use of their Personal Information, they should write to us at

the address listed under [3.1.12 How users can contact us](#). Please note that in some countries we may be permitted to charge a fee specified by law for providing a user with copies of Personal Information we may hold about them.

- 3.9 **CHILDREN UNDER 13** - The services that are provided on our Site(s) are not intended for users under the age of 13. We do not knowingly collect any Personal Information from children under 13. If we become aware that a person submitting information is under 13, we will attempt to delete the information as soon as possible. The user hereby represents they are at least 13.
- 3.10 **LINKS TO OTHER WEBSITES** - The Site(s) may contain links to other websites which are outside our control and are not covered by this Policy. If a user accesses other sites using the links provided, the operators of these sites may collect information from them which will be used by them in accordance with their privacy policy, which may differ from ours. Users should check the privacy policies on those websites for information about how those web operators use their Personal Information.
- 3.11 **UPDATES TO THIS POLICY** – From time to time we may update this Policy. When we do, we will publish the changes on this Site(s). If the user does not agree with these changes, they should not continue to use this Site(s). If material changes are made to this Policy, we will notify users by e-mail or by placing a prominent notice on this Site(s).
- 3.12 **HOW USERS CAN CONTACT US** - If users have any questions about our privacy practices, or if they would like to review or update the Personal Information we have collected about them, they can contact us via e-mail at [privacy@bemis.com](mailto:privacy@bemis.com).

## 4.0 Definitions

- 4.1 "Applicable Laws" refers to all privacy and data protection laws, statutes, directives, regulations, decrees, and other legislative measures or decisions having effect in any jurisdiction from time to time, including without limitation, the EU Data Protection Directive 95/46/EC (the "Directive"), together with all national data protection laws implementing the Directive.
- 4.2 "Third Party" or "Third Parties" means a customer, prospective customer, distributor, reseller, vendor, supplier, consultant, professional adviser or any other Third Party that does or may do business with Bemis.
- 4.3 "Personal Information" means any data relating to an individual who is or can be identified either from the data or from the data in conjunction with other information that may be collected by Bemis. Examples of data that may permit this kind of identification include but are not limited to addresses, emails, telephone numbers, customer numbers or other such customer identifiers/tags, dates of birth, tax IDs/social security numbers, mobile telephone numbers.
- 4.4 "Data Protection Authority" refers to the national public authority that is competent for supervising and enforcing compliance with any national data protection laws within its jurisdiction.
- 4.5 "Device" collectively refers to computers, mobile Devices, technology or other Device.
- 4.6 "Processing" or "Processed" means any operation or set of operations performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

- 4.7 "Site(s)" refers to Bemis web Sites, web pages, interactive features, applications, widgets, blogs and their respective contents in addition to our Twitter, Facebook or other social networking Sites, and their respective contents.

## 5.0 Responsibilities

- 5.1 Policy Review – It is the responsibility of Bemis to review this policy periodically in order to ensure we are in compliance with global Data Privacy requirements.

## 6.0 References

- 6.1 Specific Data Privacy requirements outside of the USA

6.1.1 European Economic Area (EEA)

- 6.2 Specific Data Privacy requirements within the USA

6.2.1 California Civil Code

## 7.0 Document Approvals

Role	Position	Name of Approver	Date Approved
Owner	Director - IT Security and Controls	Lori Waters	08/11/2015
Approver	VP IT & CIO	John Kreul	08/11/2015

## 8.0 Revision History

Effective Date	Rev Letter	Document Author	Description of Change
09/01/2015	A	Lori Waters	Initial Release

## 9.0 Contact

- 9.1 Individuals may direct questions or complaints regarding this Policy or their Personal Data via e-mail at [privacy@bemis.com](mailto:privacy@bemis.com).

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## Appendix 1 – Bemis Cookie Statement

**WHAT IS A COOKIE?** - Cookies are text files containing small amounts of information which are downloaded to the user's Device when a user visits a website. Cookies do lots of different jobs, like letting the user navigate between pages efficiently, remembering their preferences, and generally improving the user experience. Cookies may tell us, for example, whether a user has visited our Site(s) before or whether they are a new visitor. They can also help to ensure that advertisements users see online are more relevant to them and their interests. Some may contain the users Personal Information which they have provided to us on our Site(s).

There are two broad categories of cookies:

### **First party cookies: served directly by us to the user's computer or mobile Device**

We use first party cookies to:

- Allow us to understand what areas of the Site(s) are of interest to the user and to determine their preferences so we can better serve and provide them with tailored information from the Site(s)
- Collect technical and navigation data such as information about the user's web browser and operating system, the frequency of a user's visits, time spent on the Site(s), pages visited and, if the user arrived at the Site(s) from another website, the URL of that website
- Monitor the performance and security on our Site(s)

### **Third party cookies: served by a Third Party on our behalf**

We use Third Party cookies to:

- Select which advertisements or offers are most likely to appeal the user and display them on the Sites
- Analyze the data we obtain from our cookies to tell us how the user used the Site(s).

**Types of cookies used and length of time they may be stored** - Cookies can remain on the user's Device for different periods of time. Some cookies are 'session cookies', meaning that they exist only while the user's browser is open. These are deleted automatically once the user closes his/her browser. Other cookies are 'permanent cookies', meaning that they survive after the user's browser is closed. They can be used by websites to recognize the user's Device when the user opens his/her browser and browse the Internet again.

The various types of cookies used by us and our partners in connection with our Site(s) can be classified into one of four categories.

**Session cookies** are necessary to provide the user with services available through the Site(s) and so that they can use some of its features, such as access to secure areas. Without these cookies, services the user has asked for, like access to secure login accounts, would not be possible.

*These cookies expire when the session is closed by the user.*

**Functionality cookies** retain information relevant to settings the user has chosen within our Site(s) allowing us to tailor the website to them. For example:

- Allows us to save the user's location preferences
- Remembers settings the user has applied such as layout, text size, etc.
- Shows when the user is logged in
- Stores accessibility options

Without these cookies, some of the functionalities we use on our Site(s) will become inaccessible.

*These cookies may be retained for up to 2 years.*

**Performance / analytics cookies** are used to collect information about how visitors use our Site(s). We use the information to compile reports and to help us improve the Site(s). The cookies collect information in an anonymous form and include information such as number of visitors to the Site(s), where visitors have come to the Site(s) from and the pages they visited. *These cookies may be retained for up to 2 years.*

**Advertising / tracking cookies** are used by Third Party advertising companies to place cookies on our Site(s). These cookies enable such companies to track user activity across various sites where they display ads and record user activities so they can show ads they consider relevant to the user as they browse the web. These cookies are anonymous as they store information about the content the user is browsing but not about who they are.

*The expiration of these cookies are controlled Privacy Policies maintained by the Third Party advertiser.*

**How to Control or Delete Cookies** – The user has the right to choose whether or not to accept cookies. However, please note that if a user chooses to refuse cookies they may not be able to use the full functionality of our Site(s).

Most browsers allow users to change their cookie settings. These settings will typically be found in the “options” or “preferences” menu of the browser. In order to understand these settings, the following links may be helpful. Otherwise, the user should use the “Help” option in their browser for more details.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web](#) and [iOS](#).

To limit Third Party advertising cookies, the user can turn such cookies off by visiting the following links:

- [Your Online Choices \(http://www.youronlinechoices.com/uk/\)](http://www.youronlinechoices.com/uk/)
- [Network Advertising Initiative \(http://www.networkadvertising.org/\)](http://www.networkadvertising.org/)
- [Digital Advertising Alliance \(http://www.aboutads.info/consumers\)](http://www.aboutads.info/consumers)

The user should bear in mind that there are many more companies listed on these Sites than those that drop cookies on our website.