

This privacy policy provides you as a legal person with an overview of the handling and processing of your personal data. The Company CCL Design GmbH, hereinafter referred to as CCL Design, is an independently operating part of the international CCL Industries group.

CCL Design is committed to processing your personal data in accordance with applicable laws at all times. The data collected, used, stored, or disclosed is handled transparently for suppliers and third-party providers.

The following sections outline responsibilities and describe regular data processing procedures. For specific processing activities, CCL Design may provide you with additional privacy notices.

## 1 Responsibilities

### 1.1 Responsible party in terms of privacy policy

Responsible for the processing of your personal data is:

CCL Design GmbH  
Lindgesfeld 26-27  
D-42653 Solingen  
+49 212 3827-0  
[designinfo@cclind.com](mailto:designinfo@cclind.com)

### 1.2 Data protection officer

CCL Design has nominated an external privacy policy officer for the organization who can be reached at the following contact details:

Boris Nicolaj Willm, Resilien[i]T GmbH, Monschauer Straße 12, D-40549 Düsseldorf  
Telephone: +49 (0) 211 695289 92, E-Mail: [datenschutz.solingen@cclind.com](mailto:datenschutz.solingen@cclind.com)

### 1.3 Responsible supervisory authority

You can reach the supervisory authority responsible for CCL Design:

LDI.NRW, Kavalleriestr. 2-4, 40213 Düsseldorf  
Telephone: +49 (0)211/38424-0, E-Mail: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

## 2 General information on privacy policy

If CCL Design processes your data for the initiation, execution, or termination of a business relationship, you may be contractually obligated to provide this data. The same applies to processing your data to fulfill legal obligations, particularly in tax and financial law. Without this data, the employment relationship cannot be initiated, carried out, or terminated.

### 2.1 What data does CCL Design collect?

CCL Design processes your personal data either provided by you or received from relevant contractual partners (e.g., when handling inquiries or orders). These include:

- Master data: First and last name, title, position, address (if applicable date of birth, nationality) etc.;
- Contact data: Phone number, mobile number, E-Mail address, fax number etc.;
- Order and contract data (billing address, ID / VAT number);
- Bank and payment data (e.g. IBAN, BIC, SEPA mandate, name of credit institute);
- Video recordings in context of CCTV surveillance on company premises;
- Public records: debtor directories, land registers, commercial and association registers;
- Results of credit and sanctions checks

Only data that is necessary for the business relationship is collected. Sensitive personal data is stored only when strictly required to comply with legal obligations or voluntarily provided for that purpose.

### 2.2 For what purposes does CCL Design process your data?

CCL Design processes your personal data solely for the purposes of initiating or maintaining a business relationship. These purposes include:

- **Fulfillment of business purpose / Initiation, execution, and termination of the contractual relationship:** The processing of personal data is carried out to implement all necessary measures associated with the initiation, execution, and termination of the supplier/ third-party provider relationship: conducting pre-contractual measures (e.g., credit checks, preparation of offers, and handling of inquiries), fulfillment of contractual obligations (order, contract, and payment processing, invoicing), and management of the delivery or receipt of goods and services.
- **Supplier and third-party provider support:** For communication purposes (when CCL Design has received your name, email address, or postal address in connection with the provision of services and/or the sale of products), for helpdesk support, and to manage supplier and service provider relationships. For maintaining a group-wide supplier database to improve supplier quality.
- **Supplier/third-party provider evaluation:** Personal data is processed to optimize the quality of suppliers and services.
- **Compliance with legal obligations:** The company processes personal data to comply with data protection, tax, financial, and commercial law requirements (e.g., screening against sanctions lists and maintaining a block list to implement objections to data processing in accordance with Article 21 of the GDPR).
- **Security and protection of company assets:** Personal data is also processed as part of visitor management to protect the company's facilities, equipment, and assets from theft, unauthorized access, and other harm; for example, through video surveillance used to control access to office buildings and company premises.
- **IT security:** Logs of IT system usage are created to identify threats such as computer viruses, access to potentially dangerous external websites, unauthorized access attempts, and internal misuse (e.g., violations of information security policies). This is done to ensure the security of company systems and to prevent or manage cyberattacks. In the event of a security incident affecting your data, CCL Design is obliged under Article 33 of the GDPR to report this without delay to the competent data protection supervisory authority. In the legitimate interest of complying with this legal obligation as quickly as possible, it may be necessary to process your personal data as part of the investigation of the incident. However, no personal data about you is transmitted in the reports to the data protection supervisory authority.
- **Data security:** To ensure the security, confidentiality, and integrity of our IT systems (e.g., through security and effectiveness testing), personal data is processed to test IT systems and software products, carry out migrations, and to ensure the functionality of new products as well as the accuracy and completeness of migrations.
- **Corporate governance and process management:** Personal data is processed during audits and investigations to review and optimize operational processes within the company (quality and regulatory management, risk and damage management).
- **Assertion, exercise and defense of legal claims:** The company processes personal data for the purpose of asserting, exercising, or defending legal claims. This includes the evaluation of documents, collection of evidence, and use of information in legal proceedings and processes.

- **Whistleblowing System:** The company also operates a reporting system (e.g., whistleblowing system) to uncover misconduct and initiate appropriate measures.

Processing of your data for purposes other than those stated above will only take place if such processing is compatible with the purposes of the business relationship. You will be informed prior to any such further processing of your data and, where required, your consent will be obtained.

## 2.3 On what legal basis does CCL Design process your data?

CCL Design processes your personal data only to the extent legally required or necessary for the fulfillment of the contract, and solely based on the following legal grounds:

- **Article 6(1)(a) GDPR – Consent:** Processing is based on consent, e.g., for the disclosure of contact details to business partners.
- **Article 6(1)(b) GDPR – Contract Performance:** Processing is necessary for the initiation, execution, and termination of the third-party provider/supplier relationship.
- **Article 6(1)(c) GDPR – Legal obligation:** Processing is required to comply with legal obligations, e.g., in tax, financial, and foreign trade law.
- **Article 6(1)(f) GDPR – Legitimate interests:** Processing to protect legitimate interests, e.g., IT and data security, corporate governance, defense of lawful interests in legal proceedings, or video surveillance. In cases where CCL relies on legitimate interests as the legal basis for processing, it generally assumes that CCL Design's legitimate interests in the context of the business relationship outweigh any opposing interests, subject to case-by-case balancing.
- **Article 9(2)(f) GDPR – Legal claims:** Processing of special categories of data for asserting or defending legal claims, e.g., in legal proceedings.

## 2.4 From whom does CCL Design receive your data?

CCL Design generally processes your personal data that has been collected directly from you or provided by you or your organization, for example in connection with an inquiry, order, or business relationship. Where applicable, it may also obtain personal data about you from external sources (see section 2.5). Under certain circumstances, CCL Design may also collect personal data about you that has been made publicly available. Processing is carried out only on the basis of a valid legal basis.

## 2.5 To whom does CCL Design transfer your data?

In the course of the business relationship or its initiation, it may be necessary to transfer personal data. Such transfers are always made in accordance with the provisions of the GDPR and only to the extent necessary to fulfill the respective purposes.

Data transfers may occur for the following purposes and to the following recipients:

- **Within the company:** Your personal data may be shared internally with responsible departments and employees, provided this is necessary to fulfill the contract or request. Such transfers always follow the principle of data minimization and only to those persons responsible for the respective tasks.
- **Within the corporate group:** Personal data may be transferred within the corporate group if necessary for contract fulfillment, group-wide compliance, or for internal administrative and organizational purposes. Transfers here also comply with applicable data protection regulations and strict privacy requirements.
- **Authorities, public bodies, law enforcement agencies:** For example, tax authorities, supervisory authorities, courts, and customs authorities to fulfill legal obligations (e.g., tax requirements).

- **External service providers and processors:** This includes IT service providers (e.g., for IT maintenance, cloud services, applications, website management), software manufacturers, and other service providers (e.g., for credit checks, sanctions list screening, tax consultants, auditors, legal advisors, customer surveys, advertising agencies, destruction of files and data carriers, call centers, printing and logistics companies, telecommunications providers, delivery services, recipient's email providers), as well as data protection officers, information security officers, occupational safety officers, fire protection officers, and other organizational representatives.
- **Credit institutions:** Transfers to credit institutions may occur as part of contract fulfillment and receivables management.
- **Lawyers and courts:** In legal disputes, it may be necessary to transfer your data to lawyers or courts to assert or defend legal claims. In cases of legal proceedings or suspicion of criminal acts (e.g., courts, opposing lawyers, authorities, contractual partners, advisors, business partners, opponents), transfers occur as far as necessary to protect our rights.
- **External auditors:** In the context of audits, inspections, or certifications, data may be transferred to external auditors. Such transfers comply with strict data protection controls and only occur to the extent necessary.
- **Insurance companies:** Data may be transferred to insurance companies, for example, to process insurance claims and benefits.
- **Security and protection services:** To ensure access control and manage visitor management, the processing of personal data is necessary.

### 2.6 Why does CCL Design possibly transfer data to third countries?

In the course of the business relationship or its initiation, personal data may be transferred to countries outside the European Union (EU) or the European Economic Area (EEA), so-called third countries. Such transfers are carried out only in strict compliance with the provisions of the General Data Protection Regulation (GDPR).

The transfer of personal data to third countries takes place either on the basis of an adequacy decision by the European Commission, through EU-approved standard contractual clauses, in exceptional cases based on your explicit consent, or by using additional protective measures such as pseudonymization or encryption.

Transfers to third countries may occur in the following:

- When using IT applications and cloud services (e.g., Microsoft 365, HR software, ERP systems), data may be transferred to service providers in third countries. These providers are contractually obligated to guarantee a level of protection equivalent to European data protection standards.
- In the course of processing international orders and projects.
- Due to the company's affiliation with an international corporate group, it may be necessary to transfer personal data to group companies in third countries, for example for group-wide accounting or compliance purposes. The mentioned protective mechanisms are also applied in these cases.

Transfers of personal data to third countries are always carried out with the utmost care and in compliance with applicable data protection regulations. If you have questions regarding the specific protective measures used or the recipients of your data in third countries, please contact the data protection officer of CCL Design.

## 2.7 Is automated decision-making or profiling carried out?

CCL Design does not use automated decision-making processes or profiling that have legal effects on you or similarly significantly affect you. All essential decisions, especially regarding contractual and payment terms, are made by CCL Design employees and are based on a careful case-by-case assessment.

## 2.8 How long does CCL Design store your personal data?

Unless an explicit or legal storage period is specified at the time of data collection, your personal data will be deleted as soon as it is no longer necessary for the fulfillment of the aforementioned purposes and there are no statutory retention obligations or legal grounds for further storage.

## 3 What rights do you have regarding your data?

As a data subject, you have the following rights concerning your personal data:

- **Right of access:** The right to obtain information about and access to your stored personal data, pursuant to Art. 15 GDPR.
- **Right to rectification:** The right to have inaccurate, outdated, or otherwise incorrect personal data concerning you corrected or updated, pursuant to Art. 16 GDPR.
- **Right to erasure:** The right to have your personal data deleted if its storage is unlawful, if the purpose of processing has been fulfilled and storage is no longer necessary, or if you withdraw your consent to processing, pursuant to Art. 17 GDPR.
- **Right to restriction of processing:** The right to restrict the processing of your personal data under the conditions specified in Art. 18(1)(a)–(d) GDPR, pursuant to Art. 18 GDPR.
- **Right to data portability:** The right to receive your personal data that you have provided and which concerns you, pursuant to Art. 20 GDPR.
- **Right to object:** The right to object to the processing of your personal data, pursuant to Art. 21 GDPR.
- **Right to lodge a complaint:** The right to file a complaint with a supervisory authority, pursuant to Art. 77 GDPR.
- **Right to withdraw consent:** The right to withdraw any consent you have given, without affecting the lawfulness of processing based on consent before its withdrawal, pursuant to Art. 7(3) GDPR.

If you have any questions regarding data protection at CCL Design, you can contact the Data Protection Officer of CCL Design, who will gladly provide you with detailed information about your rights.

**Exercising your data subject rights:** You may exercise your rights and, if applicable, your objection informally by post or email addressed to:

[datenschutz.solingen@cclind.com](mailto:datenschutz.solingen@cclind.com)

To ensure efficient processing and response to your request, CCL Design kindly asks you to provide proof of your identity when exercising your rights, for example by sending an electronic (redacted) copy of your ID or by making the request in person.

## 4 Changes to this privacy information

This privacy information is updated from time to time and adapted to current legal requirements. CCL Design will notify you separately of any significant changes to the content.