



# Sonoco Global Privacy Policy

Effective Date: July 1, 2023

## INTRODUCTION

Sonoco Products Company and its affiliated entities (collectively, “Sonoco,” “we,” “our,” or “us”) are committed to protecting your privacy in accordance with all applicable data protection laws. References in this privacy policy to “Sonoco,” “we,” “our” and “us” are references to the entity responsible for the processing of your personal data. This entity is also referred to as the data controller.

This privacy policy (“Privacy Policy”) describes the types of personal data that Sonoco collects from you or that you may provide when you visit sonoco.com or any other of our websites where this Privacy Policy is posted or linked (each a “Site” and collectively, “Sites”) or otherwise interact with us or request services from us as described further in this Privacy Policy. The Sites and other interactions are collectively the “Services.” This Privacy Policy also explains how Sonoco and its affiliated entities collect, use, maintain, protect and disclose your personal data.

Please read this Privacy Policy carefully. By using any of our Services, you agree to the collection, use, and disclosure of your personal data as described in this Privacy Policy. If any term in this Privacy Policy is unacceptable to you, please do not use the Services or provide any personal data.

## I. INFORMATION COLLECTED

### a. Information You Provide or We Collect About You Directly When Using Our Services

We collect and maintain several types of information from and about users of our Services, which may include information defined as personal data, personal information, or personally identifiable information under an applicable law (“personal data”). Personal data does not include anonymous or non-personal data (i.e., information that cannot be associated with or tracked back to a specific consumer, household or device).

Sonoco collects the following personal data from you:

- Personal identifiers, such as name, mailing address, country and postal code, email address, telephone or mobile phone number;
- Commercial information, such as credit or debit card number or other financial information;
- Employer-related information, such as your title and the company’s name, address, and phone number;
- Information regarding the products or services purchased and products of interest;
- Internet or other electronic network activity information, including, browsing history, search history, and information regarding your interaction with our Sites (as explained further below under the “**Information We Automatically Collect About You**” subsection to this section);
- Information you provide to use about authorized users (e.g., guests or co-owners) who may have access to or be able to access your connected devices through one of our Sites; and
- Charges you incur and other information related to your transactions on the Sites.

Sonoco will not collect personal data if such collection is prohibited under the applicable data protection laws. In any case, no personal data revealing racial or ethnic origin, political opinions, philosophical beliefs, or concerning sex life will be processed. Sonoco will maintain personal data in a manner that ensures it is accurate, complete and up-to-date.

We collect such personal data directly from you through our Services, when, for example, you:

- Complete forms on our Sites or contact us directly via email. This includes information provided when you sign up for our products, services, newsletters, emails and other types of information materials; when we process and respond to your inquiries related to products and customer services, investor or media



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- inquiries, becoming a Sonoco partner/supplier, or other information;
- Register for an account on our Sites. This information may include, for example, registration data such as your name and email address;
- Provide to us information about authorized users who may have access to or be able to access your connected devices through one of our Sites. Information you provide about your authorized users may include their names and email addresses;
- Correspond with us. This includes information and personal data contained in records and copies of your correspondence with us, including your participation in a survey or promotion, request for information, or when you otherwise contact us; and
- Purchase a product or service. We collect information, such as credit or debit card number or other financial information.

## **b. Information We Collect from Third Parties or Other Sources**

Subject to applicable law, we obtain personal data or other information about you from third parties or other sources and combine this information with the information we collect from and about you through the Services. Such information includes the following:

- Information obtained through communications that you make through a third party, such as through our network of independent distributors;
- Information obtained through transactions you complete with us or our distributors, including charges you incur; and
- Any other information obtained through companies that have business relationships with us, such as our licensees, affiliates, vendors and marketing and business partners.

Subject to applicable law, we also obtain information and personal data about you from other online sources, including when you connect with Sonoco through its official corporate pages on third-party social networks (such as Facebook, Twitter, YouTube, LinkedIn, or Instagram) or the “apps” on those pages. This information includes the name, username, demographic information, updated address or contact information and interests. We combine this information with the information we collect from and about you through the Services.

## **c. Information We Automatically Collect About You**

As you navigate through and interact with our Services, we use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns. Subject to applicable law, the information collected may vary by Site. Such information includes:

- Details of your visits to our Sites, including resources that you access and use on our Services, the areas or pages of the Site that you visit, the amount of time you spend viewing the Site, traffic data, location data, logs, language, date and time of access, frequency of your return to the Site, other click-stream or Site-usage data, emails that you open, forward or click-through to our Site, and other communication data;
- Information about your computer and internet connection, including your IP address, geolocation, operating system, software version, domain name from which you accessed the Services, and browser type;
- Device information, including the model, serial number, and technical information about the device you have installed and other information you choose to share about the product while using our Services, including but not limited to the device status for entryway products and logging information regarding device usage;
- Details of referring websites (URL);



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- Content of the request (concrete page);
- Access Status / HTTP status code;
- Amount of data transferred in each case; and
- Browser.

The information we collect automatically is statistical data that helps us improve our Services and deliver a better and more personalized service, including by enabling us to:

- Determine traffic patterns;
- Count visits;
- Determine traffic sources so we can measure and improve the performance and security of our Services;
- Help us to know which pages and content are the most and least popular;
- Observe search patterns to provide more intuitive navigation cues;
- Determine user frequency; and
- Troubleshoot unexpected issues with your connected devices.

#### **d. Cookies and Other Automated Technology**

The Sites use cookies, analytics tools, and other similar technologies to collect information about your equipment, browsing actions, and patterns to help our Sites function effectively, improve the Services, and assist us with our marketing.

##### **Cookies**

We and certain third parties use cookies to collect certain information about visitors to our Sites and interactions with our emails and use such information to allow Sonoco to keep track of analytics and certain statistical information that enables us to improve our Sites and provide you with more relevant content on our Sites. Our Services use single-session (transient) and multi-session (persistent) cookies. Transient cookies last only as long as your web browser is open and are used for technical purposes such as enabling better navigation on our Services. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer for longer periods and are used for purposes which include tracking the number of unique visitors to our Services and information such as the number of views a page gets, how much time a user spends on a page, and other pertinent web statistics. If you wish to disable the use of cookies or remove them at any time from your computer, you can disable or delete them using your browser (consult your browser's "Help" menu to learn how to delete cookies); however, you must enable cookies to access certain information on our Sites.

Our system may not respond to Do Not Track requests or headers from some or all browsers. Certain parts of our Sites also include advertisements from third parties. You can opt out of being targeted by certain third-party ad-servers and Sonoco served ads online using the National Advertising Initiative's opt-out tool or the About Ads opt-out tool. To learn more about the use of cookies or other technologies to deliver more relevant advertising and to know your choices about not having this information used by third-party advertisers, please visit <http://www.networkadvertising.org> and <http://www.aboutads.info/choices/>.

Depending on which one of the Sites you may access, the Sites may have a specific cookie policy addressing the use of cookies. If the Site has a specific cookie policy, please refer to that policy directly for more information about specific cookies used on the Site.

##### **Web Beacons**

Sonoco uses the services of a third party to help us measure the effectiveness of our advertising and how



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users interact with the Sites. To do this, we use web beacons and cookies provided by the third company. A “web beacon” is also called a web bug or a pixel tag or a clear GIF. Used in combination with cookies, a web beacon is an often-transparent graphic image, usually no larger than 1 pixel x 1 pixel, that is placed on a website or in an e-mail that is used to monitor the behavior of the user visiting the website or sending the e-mail. By supplementing our records, this information helps us learn things about, for example, what pages are most attractive to our users and which of our services most interest our customers. Although the third party logs the information coming from our Sites on our behalf, we control how that data may and may not be used. If you do not wish to help us learn how to improve our Sites, products and offers, you can opt out of this analysis tool by emailing us at [privacy@sonoco.com](mailto:privacy@sonoco.com).

## Social Media Plug-Ins

Sonoco offers social media plug-ins for third-party social networks (each a “Social Media Company” and collectively, “Social Media Companies”) that include Facebook, Twitter, LinkedIn, YouTube, and Instagram. For example, we have Facebook like and share buttons, a tweet button for Twitter, and embedded videos that offer certain interactive features and we and the Social Media Company track your interactions with these functions. Integration of the plug-ins allows Social Media Companies to receive information that you have loaded onto our Sites. When you visit the Sites, the operators of the social media plug-ins place cookies on your computer that enable them to recognize you on their websites after you have visited our Sites, or that enable them to add the information collected from your visit to our Sites with your prior activity on those websites.

We do not control what information is collected by the social media plug-ins or the information practices adopted by those Social Media Companies. This information exchange takes place automatically. To prevent this exchange, you can log out of your social media account(s) before using the Sites and/or disable cookies through your web browser.

For more information on the purpose and scope of the data collection and how it is processed by Social Media Companies, please refer to the privacy policies provided below. There you will also find further information about your rights and setting options for the protection of your privacy.

- Facebook Inc., <http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other#applications> and <http://www.facebook.com/about/privacy/your-info#everyoneinfo>.
- Twitter, Inc., <https://twitter.com/en/privacy>.
- LinkedIn Corporation, <http://www.linkedin.com/legal/privacy-policy>.
- YouTube, <https://policies.google.com/privacy>.
- Instagram, <https://help.instagram.com/519522125107875>.

## e. For EEA Users: Web Analytics

Our Sites use HubSpot Traffic Analytics, a web analytics service provided by HubSpot and Google Analytics (“Google”), a web analytics service provided by Google Inc. (collectively, “Analytics Providers”) to analyze and regularly improve the use of the Sites. The Analytics Providers use cookies that enable an analysis of your use of the Sites.

We use the function ‘anonymizeIP’ (so-called IP-Masking). Only in exceptional cases will the whole IP address first be transferred to a server in the United States and truncated there. The IP anonymization is active on the Sites. The IP address that your browser conveys within the scope of these web analytics services will not be associated with any other data held by the Analytics Providers.

During your visit to our Sites, the following data may be collected:



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- The pages you call up, your “click behavior;”
- Achievement of “goals” (conversions, e.g., newsletter registrations, downloads, purchases);
- Your user behavior (e.g., clicks, time spend, bounce rates).
- Your approximate location (region);
- Your IP address (in abbreviated form);
- Technical information about your browser and the end devices you use (e.g., language settings, screen resolution);
- Your internet provider; and
- The referrer URL (the website/advertising medium from which you came to this website).

On our behalf, the Analytics Providers will use this information to evaluate your (pseudonymous) use of our Sites to compile reports on the activities. The reports provided by the Analytics Providers are used to analyze the performance of our Sites.

The recipient of the data are the Analytics Providers. More information about the contractual arrangements for the processing of personal data with the Analytics Providers can be found at:

- HubSpot: <https://legal.hubspot.com/dpa>; and
- Google Analytics: <https://privacy.google.com/businesses/processorterms/> and <https://privacy.google.com/businesses/controllerterms/>.

Access by US authorities to the data stored by the Analytics Providers cannot be ruled out.

The information generated by the cookies about your use of the Sites will be transmitted to and stored by the Analytics Providers on servers in the United States. For more information about the safeguards implemented with the Analytics Providers for international data transfers, please visit <https://www.hubspot.com/data-privacy/privacy-shield> and <https://privacy.google.com/businesses/processorterms/>.

You can prevent the collection of data generated by the cookie and related to your use of our Sites (including your IP address) and the processing of this data by HubSpot by adjusting your cookie policy [\[HERE\]](#) or by Google Analytics by not providing your consent to the setting of the cookie at <Privacy Preference Center> or for website-based use, downloading and installing the browser add-on to disable Google Analytics [\[HERE\]](#).

You can also prevent the storage of cookies when using our Sites by configuring your browser software accordingly. However, if you configure your browser to reject all cookies, this may limit functionality on the Sites.

The legal basis for this data processing is your consent. You can withdraw your consent at any time, with future effect, by disabling the cookies in your browser.

It cannot be ruled out that the Analytics Providers use the data described in this section for their own purposes and link it to other data such as possibly existing Analytics Providers accounts.

For more information about HubSpots’ terms of use and HubSpot’s privacy policy, please visit <https://legal.hubspot.com/privacy-policy> and <https://legal.hubspot.com/terms-of-service>. For more information about Google Analytics’ terms of use and Google’s privacy policy, please visit <https://marketingplatform.google.com/about/analytics/terms/gb/> and <https://policies.google.com/?hl=en>.

## **f. Combination of Information**

Subject to and in accordance with applicable law, we combine the information we receive from and about you, including information you provide to us and information we automatically collect through our Sites, as well as information collected from other online sources or from third-party sources to help us tailor our communications



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to you and to improve our Services.

## II. Information Use

Below is information on how we process the information collected about you (including personal data), as well as the corresponding legal basis. We process your information where the processing is:

- Necessary for entering into, or the performance of, a contract with you, in particular:
- To carry out our obligations arising from any contracts entered into between you and us, and to provide you with the information, products and services you request from us;
- To manage job opportunities at Sonoco for recruitment; and
- To validate, confirm, verify, and track your account, products or services (including to contact you about your account, products or services).

The personal data are necessary to enter and perform the contractual relationship with you. Without such information, we may not be able to enter into and honor the contractual relationship with you.

- Necessary for us to comply with a legal obligation.
- The processing of your personal data is a statutory requirement.
- Necessary for the purposes of the legitimate interests pursued by a third party or us , in particular, Sonoco's legitimate interests in (i) managing its public and communication relations, (ii) providing information about its products and services, (iii) running its business, (iv) improving the user's experience, (v) promoting Sonoco's position in the market, and (vii) ensuring the proper functioning of the company for the following purposes:
  - To allow you to participate in interactive features of our Services (when you choose to do so);
  - To keep our Services safe and secure;
  - To provide you with technical support and to improve our content, products and Services;
  - To provide you with information that you have requested and respond to your inquiries submitted through the contact form or any other means;
  - To notify you of changes to our Services;
  - To carry out promotional operations and direct marketing surveys (either directly or indirectly through a third party);
  - If you are an existing customer, to communicate (including by email and SMS) with you to provide information about goods and services similar to those that were the subject of a previous sale or, where permitted by applicable law, were negotiations of a sale to you;
  - To protect the security and integrity of the Sites, and our business, such as by protecting against fraud, unauthorized transactions, claims and other liabilities and managing risk exposure, including by identifying potential hackers and other unauthorized users;
  - Subject to applicable law and regulations, in the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, to transfer, sell, or assign to third parties information concerning your relationship with us, including, without limitation, personal data that you provide and other information concerning your relationship with us;
  - To use your data in an aggregated non-specific format for analytical and demographic purposes;



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- To troubleshoot unexpected issues with your connected devices and other Sonoco products; and
- If you use any of the Sites to connect with third-party services, to use information from and about you, on your behalf, to interact with these third-party services based on your requests.

The provision of your personal data is necessary to provide you with the respective service. Without such information, we may not be able to deliver the respective service to you.

- Based on your consent, depending on the country in which you use our Services and subject to applicable laws, in order:
  - To present the content from our Services in the most effective manner for you and for your device, and across different Services;
  - To provide you with certain services on a Site or information about goods or services we feel may interest you. For example, to contact you with information, newsletters, promotional materials, and contests from Sonoco or on behalf of our business partners, licensees, and affiliates. They may use a pixel tag or other similar technology to collect information about your visits to Sites, and they may use that information to target advertisements for our products and Services;
  - To manage our newsletter subscriptions;
  - To enhance your online experience if you are a user in the EEA, including as a way to recognize you and welcome you to a Site, make the account usage and purchasing process faster and smoother and provide you with customized Site content, targeted offers, and advertising on Sites, or via email, telephone, text message, or by mail;
  - To evaluate your behavior when you read Sonoco's newsletter and create a user profile;
  - To recognize your online activities over time and across different Services and improve our content, products, and services; and
  - For any other purpose where you have provided consent where it is legally required.

The provision of your personal data for such purposes is voluntary. If you do not want us to use your data in this way, simply do not opt in when we ask for your consent on the relevant forms on our Sites where we collect your data. You can withdraw your consent at any time with effect for the future and can always exercise your right to ask us not to process your personal data for marketing purposes by contacting us as specified in the section **"Your Privacy Rights"** or with regard to cookies, by disabling them on your browser.

Sonoco ensures that our internal governance procedures clearly specify the reasons behind decisions to use personal data for further processing purposes. Prior to using your personal data for a purpose other than the one for which it was initially collected, you will be informed about such new purpose if Sonoco is required to do so under applicable law.

### III. Disclosure of Personal Data

Sonoco will only grant access to personal data on a need-to-know basis, and such access will be authorized and limited to the personal data that is necessary to perform the function for which such access is granted. Where required by applicable law, service providers are legally and contractually required to abide by our instructions when processing personal data and will only receive personal data according to the purposes of the service agreement or any other type of contract entered into with Sonoco.

Subject to applicable law and regulations, Sonoco discloses the personal data we collect from and about you in the following ways:

- With our affiliated companies, installers, retailers and dealers, including subsidiaries of such companies;



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- With our third-party service providers that provide business, professional or technical support functions for us and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them;
- With our agents, licensees, and other companies that assist us in providing a product or service to you, including, but not limited to, making your purchase and installation; providing you with customer assistance; processing and/or confirming your transactions; providing you with the services you requested; assessing creditworthiness; billing and collecting any amounts owed in connection with your account or products or services purchased; or recovering any monies due, such as through debt collection agencies;
- With our select licensees, affiliates, retailers and business partners that we believe may have offers of interest to you, including for their own marketing purposes;
- As necessary if we believe that there has been a violation of our Terms of Use or of our rights or the rights of any third party;
- To respond to judicial process or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law;
- As otherwise described to you at the point of collection or with your consent when required by applicable law and regulations;
- With a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal data held by one or more of our entities about our users is among the assets transferred. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personal data provided through the Services in a manner that is consistent with this Privacy Policy;
- To insolvency administrators in the event of bankruptcy; and
- To fulfill the purpose for which you provide it. For example, if you request us to contact a third party, we may transmit the content of your request to the recipient.

Sonoco may also share aggregate or anonymous non-personal data about you and other users with third parties for their marketing or analytics uses, without restrictions.

## IV. Cross-Border Transfers of Personal Data

International data transfers refers to transfers of personal data outside of the European Economic Area, or, for persons outside of the European Economic Area, outside of the country in which you are based. The international footprint of Sonoco involves a large number of transfers of personal data between different corporate entities, as well as to third parties located in various countries. This includes the transfer of personal data from EU Member States to countries outside of the EU considered as not providing adequate legal protection for the processing of personal data.

Sonoco ensures that appropriate safeguards are implemented to secure such data transfers in compliance with applicable data protection laws. We have implemented EU Standard Contractual Clauses to cover our international data transfers and a copy of these clauses can be obtained by contacting the DPO where applicable.

## V. Data Retention

We will not retain your personal data processed longer than allowed under the applicable data protection laws.





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In any case, we will not retain it longer than such personal data is necessary for the purpose for which it was collected or otherwise processed, subject to applicable local retention requirements.

## VI. Your Privacy Rights

Under applicable law and regulations, you may, at any time, exercise certain rights, as described below.

### a. For Residents of the European Union/European Economic Area

We remind you that you may at any time exercise certain rights you may have under applicable law and regulation, including the following rights:

- The right to request access to your personal data, which includes the right to obtain confirmation from us as to whether or not personal data concerning you is being processed, and where that is the case, access to the personal data and information related to how it is processed;
- The right to rectification or erasure of your personal data, which includes the right to have incomplete personal data completed, including by means of providing a supplementary statement, and certain rights to request us to erase your personal data without undue delay;
- The right to restrict or object to processing concerning your personal data, which includes restricting us from continuing to process your personal data under certain circumstances (e.g., where you contest the accuracy of your personal data, processing is unlawful, your personal data is no longer needed for the purposes of processing, or you have otherwise objected to processing related to automated individual decision-making);
- The right to data portability, which includes certain rights to have your personal data transmitted from us to another controller;
- Where data processing is based on your consent, the right to withdraw consent at any time; and
- The right to lodge a complaint with the competent supervisory authority.

Any requests related to the above rights may be made by sending an email to [privacy@sonoco.com](mailto:privacy@sonoco.com) where applicable.

### b. For Residents of California

If you are a California resident, the California Consumer Privacy Act, as amended by the California Privacy Rights Act (Civil Code Section 1798.100, et seq.) (collectively, the “CCPA”), may provide consumers with specific rights regarding your personal data, known as personal information under the CCPA.

#### Information We Collect

Depending on how you have interacted with us, we may have collected certain information within the following categories of personal information from you in the last twelve (12) months. The categories below are those identified in the CCPA.

The categories of personal information we may have collected from you include:

- **Identifiers:** Such as your name, postal address, Internet Protocol (IP) address, unique personal identifiers, online identifiers, email address, telephone number, account name, or other similar identifiers.
- **Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)):** Such as business information and financial account information.
- **Commercial information:** Such as records of personal or real property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.



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- **Internet or other electronic network activity information:** Such as your browsing history, search history, time spent on our Services, date and time of access, number of visits to our Services, and information regarding interactions with an Internet website, application, or advertisement.
- **Geolocation data:** Such as your physical location or movements.
- **Inferences drawn from other personal information:** Such as inferences drawn from the above information that may reflect your preferences, characteristics, predispositions, behavior, attitudes, or similar behavioral information.

## Use of Personal Information

We may use the personal information we collect for the purposes described in section II (“**Information Use**”) above.

## Disclosures of Your Personal Information

We disclose your information for business purposes as described in section III (“**Disclosure of Personal Data**”). In the last twelve (12) months, depending on how you have interacted with us, we may have disclosed your personal information for a business purpose to the categories of third parties indicated in the cart below.

Category of Personal Information Collected	Categories of Third Parties To Whom Personal Information Is Disclosed for a Business Purpose
<b>Identifiers and categories of personal information in Cal. Civ. Code Section 1798.80(e)</b>	<ul style="list-style-type: none"> <li>• Affiliated companies and subsidiaries;</li> <li>• Business Partners, which may include, for example, our retailers, dealers, and integration partners;</li> <li>• Service Providers who provide professional or technical support functions;</li> <li>• Logistics Suppliers;</li> <li>• Marketing Partners, which may include, for example, entities that assist us with market research or online advertising; and</li> <li>• Professional Service Organizations, such as an external auditor or law firm.</li> </ul>
<b>Commercial information</b>	<ul style="list-style-type: none"> <li>• Affiliated companies and subsidiaries;</li> <li>• Business Partners, which may include, for example, our retailers, dealers, and integration partners; and</li> <li>• Service Providers who provide professional or technical support functions.</li> </ul>
<b>Internet or other electronic network activity information</b>	<ul style="list-style-type: none"> <li>• Business Partners, which may include for, example, our retailers, dealers, and integration partners;</li> <li>• Service Providers who provide professional or technical support functions; and</li> <li>• Marketing Partners, which may include, for example, entities that assist us with market research or online advertising</li> </ul>



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Category of Personal Information Collected	Categories of Third Parties To Whom Personal Information Is Disclosed for a Business Purpose
<b>Geolocation data</b>	<ul style="list-style-type: none"> <li>Business Partners, which may include, for example, our retailers, dealers, and integration partners; and</li> <li>Service Providers who provide professional or technical support functions.</li> </ul>
<b>Inferences drawn from other personal information</b>	<ul style="list-style-type: none"> <li>Business Partners, which may include, for example, our retailers, dealers, and integration partners; and</li> <li>Marketing Partners, which may include, for example, entities that assist us with market research or online advertising.</li> </ul>

## *“Sales” or “Sharing” of Personal Information*

Sonoco does not sell your personal information for direct, monetary profit. However, we do engage in certain information disclosure activities as described in section III (“Disclosure of Personal Data”) that may be considered “sales” or “sharing” under the CCPA. For instance, our Services may include social media plug-ins (such as the Facebook like button), widgets (such as the “Share” button), cookies or other tools made available by third parties, such as social media companies, that may result in information being collected or disclosed between us and the third parties for various purposes, including to select and serve personalized advertisements to you and others. These third parties may set and access their own cookies, web beacons, and embedded scripts on your device, and they may otherwise collect or have access to information about you, including unique personal identifiers such as an IP address, and they may disclose that information to us. Your interactions with these third parties are governed by the third parties’ privacy policies.

In the previous twelve (12) months, we have sold or shared the following categories of personal information:

Category of Personal Information Collected	Business or Commercial Purpose	Categories of Third Parties to Whom Personal Information was Disclosed That May be Considered a “Sale/Sharing” Under the CCPA
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>To provide our Services</li> <li>To provide you with personal advertising and content</li> </ul>	<ul style="list-style-type: none"> <li>Advertisers and advertising networks, including social media companies</li> </ul>
<b>Internet or other electronic network activity information</b>	<ul style="list-style-type: none"> <li>To provide you with personal advertising and content</li> </ul>	<ul style="list-style-type: none"> <li>Advertisers and advertising networks, including social media companies</li> </ul>
<b>Geolocation data</b>	<ul style="list-style-type: none"> <li>To provide you with personal advertising and content</li> </ul>	<ul style="list-style-type: none"> <li>Advertisers and advertising networks, including social media companies</li> </ul>

Sonoco does not knowingly sell or share personal information of consumers under 16 years of age.



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## CCPA Privacy Rights

Under the CCPA, subject to certain exceptions, California residents have the following rights:

- **Right to Know and Access Your Personal Information:** You have the right to be informed of the categories of personal information that we collect about you, the categories of sources from which the personal information was collected, the business or commercial purposes for which the personal information is collected, the business or commercial purpose for disclosing, selling, or sharing the personal information, and the categories of third parties with whom we sell, share or disclose the personal information, as set forth in this Privacy Policy. You also have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we have verified your identity, we will disclose the specific pieces of personal information we collected about you electronically, at your option, in a readily useable format that allows you to transmit the information from one entity to another entity without hindrance.
- **Right to Delete:** You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.
- **Right to Correct Inaccuracies:** You have the right to request that we correct any inaccuracies in the personal information that we maintain about you.
- **Right to Opt Out of Sales or Sharing:** We do not sell your personal information for profit. However, as described below, we do engage in certain information disclosure activities that may be considered “sales” or “sharing” under the CCPA. If we sell or share your personal information to third parties, you may have the right to opt out of the sale or sharing of such information. If you have an opt-out preference signal enabled (e.g., the Global Privacy Control), you will automatically be opted out of the sale or sharing of your information, but we may ask you to confirm your preference if you have previously consented to the sale or sharing of your personal information. Please also note that that if you have an account with us, but are not logged into your account, we may not be able to associate the browser or device information connected to your opt-out preference signal with you. If you would like for us to make this connection, you may submit additional information to us through the interactive webform linked below and in the “**Do Not Sell or Share My Personal Information**” link at the bottom of our Sites.

To download and use a browser supporting the opt-out preference signal, please visit <https://globalprivacycontrol.org/orgs>. If you choose to use the opt-out preference signal, you will need to enable it for each supported browser or browser extension you use.

### [Do Not Sell or Share My Personal Information](#)

Please note that opting out of the sale or sharing of your personal information may impair some features and functionality of the Services.

- **Right to Non-Discrimination:** Unless permitted by applicable law, we will not discriminate against you for exercising any of your privacy rights under the CCPA or other applicable law, including by denying you goods or services; charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing you a different level of quality of goods or services; or suggesting that you will receive a different price or rate for goods or services or a different level of quality of goods or services.

To exercise your right to access, delete or correct your personal information as described above, it is necessary for us to verify your identity or authority to make the request and confirm the personal information relates to you. To verify your identity, we may ask you to provide your full name, telephone number, and postal address.

Only you or an authorized agent (“Authorized Agent”) may make a verifiable consumer request related to your



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personal data. When an Authorized Agent is submitting a request on your behalf, we require your Authorized Agent to provide evidence of their entitlement, which must include information sufficient to identify you and the purpose of the request, and at least one of the following:

- Written and signed permission designating the Authorized Agent to act on your behalf. You must verify your identity with us and directly confirm with us that you have provided the Authorized Agent permission to submit the request;
- Evidence that you have provided the Authorized Agent with power of attorney pursuant to the California Probate Code; or
- Proof that the Authorized Agent is a person or business entity registered with the California Secretary of State and that you have authorized such person or business entity to act on your behalf.

Absent such documentation, we reserve the right to refuse to comply with third-party requests for information. You also may make a verifiable consumer request on behalf of your minor child.

## Exercising CCPA Privacy Rights

To exercise privacy rights as described above, please submit a verifiable consumer request by:

- Submitting a request through our online request portal [\[HERE\]](#), or
- Calling us at 1-800-377-2692

Sonoco will confirm receipt of the request within 10 days and explain how it will process the request. Sonoco will then respond to the request within 45 days. Sonoco may require an additional 45 days (for a total of 90 days) to process your request, but in those situations, Sonoco will provide you a response and explanation for the reason it will take more than 45 days to respond to the request.

Non-affiliated third parties are independent from Sonoco and if you wish to receive information about your disclosure choices or stop communications from such third parties, you will need to contact those third parties.

## *Shine the Light*

In addition to your rights under the CCPA, California Civil Code Section 1798.83 gives you the right, if a California resident, to request certain details about how your information is shared with third parties for direct marketing purposes. If you are a California resident and would like to make such a request, please contact us using the information provided in the “Data Controller and Contact Information” section below.

## *Data Retention*

We may retain all categories of your personal information described above for as long as needed to carry out the purposes described herein or as otherwise required by applicable law. Unless we are required or permitted by law to keep your personal information for a longer period of time, when your personal data is no longer necessary to carry out the purposes for which we process it, we will delete your personal information or keep it in a form that does not permit identifying you. When determining the retention period, we take into account various criteria, such as the nature of the use of our Services, your general relationship with us, the impact on our ability to provide you Services if we delete your personal information, mandatory retention periods provided by law and the statute of limitations, and our use of your personal information for aggregated market research.

## **c. For Residents of Colorado, Connecticut, Utah and Virginia**

Eligible residents of Colorado, Connecticut, Utah and Virginia also have rights with respect to the personal data that Sonoco collects about you. This Colorado, Connecticut, Utah, and Virginia Privacy Rights section supplements this Privacy Policy and applies solely to eligible residents of Colorado, Connecticut, Utah and Virginia. Any terms not defined in this section have the same meaning as defined under applicable Colorado, Connecticut, Utah and Virginia privacy law, including the Colorado Privacy Act, Connecticut Data Privacy Act,



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Utah Consumer Privacy Act and Virginia Consumer Data Protection Act. Subject to certain exceptions, if you are an eligible resident of one of these states, you have certain privacy rights which may include, depending on your state of residency:

- **Right to Access:** You have the right to confirm whether Sonoco processes your personal data and access such data. You also have the right to obtain your personal data in a portable, and to the extent reasonable feasible, readily usable format that you can transmit without hindrance.
- **Right to Delete:** You have the right to request that Sonoco delete the personal data you have provided to us or that Sonoco has otherwise obtained about you.
- **Right to Correct:** You have the right to request that Sonoco correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of your personal data.
- **Right to Opt Out:** If applicable, you have the right to opt out of the processing of your personal data for the purposes of (i) targeted advertising, (ii) the sale of your personal data and (iii) profiling in furtherance of decisions, including, for eligible residents of Connecticut, solely automated decisions, that produce legal or similarly significant effects.
- **Right to Appeal:** You have the right to appeal Sonoco's decision with regard to your request to exercise any rights described herein.

To exercise the rights described above, please submit a consumer request to us by:

- Submitting a request through our online request portal [\[HERE\]](#), or
- Calling us at 1-800-377-2692

**Additional Disclosures for Colorado Residents:** We may sell or use your personal information as described in section II ("Information Use") of this Privacy Policy for targeted advertising purposes.

## d. For Residents of Australia and New Zealand

### Applicable Privacy Requirements

For users accessing a Site in Australia and New Zealand, applicable privacy requirements we comply with include:

- In Australia, the Privacy Act 1988 (Cth) including the Australian Privacy Principles, the Spam Act 2003 (Cth), the Do Not Call Register Act 2006 (Cth) and applicable state/territory health privacy laws and any mandatory standards or industry codes; and
- In New Zealand, all applicable New Zealand laws, statutes and regulations, including without limitation the Privacy Act 2020 and the Unsolicited Electronic Messages Act 2007.

In this section of the Privacy Policy, the term "Personal Information" includes, as applicable, in Australia, the meaning given to "Personal Information" under the Privacy Act 1988 (Cth), and in New Zealand, the meaning given to the same term under the Privacy Act 2020 (NZ).

### *Using Personal Information*

If we use your Personal Information to contact you and you would prefer us not to, or if you indicate a preference for a method of communication, please let us know and we will respect your preference. When your choice is to continue to deal with us, we take it that you agree to and consent to us using your Personal Information, providing we follow the approach we explain in this Privacy Policy and comply with the law.

### *Storing and Disclosing Your Personal Information*

Residents of Australia and New Zealand accessing and using the Sites are notified that your Personal Information



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may be held and processed overseas. Overseas countries where your data may be stored include the United States (as Sonoco is headquartered in South Carolina), Canada, Mexico, South America, Europe, India, Australia and New Zealand. When we pass on or share your Personal Information in this way, we take steps to ensure it is treated in the same way that we would treat it and we comply with applicable law. Where reasonably possible, we seek to work with information and records from which Personal Information has been removed.

## *Requests for Access to Your Personal Information and Complaints About Privacy*

You may wish to contact us to request access to your Personal Information, to seek to correct it or to make a complaint about privacy. Our contact details are set out below.

We will respond to your request for access to Personal Information we hold about you as soon as we reasonably can, including if we are unable to provide you with access (such as when we no longer hold the information).

We do not impose any charge for a request for access, but we may charge you a reasonable fee for our costs associated with providing you with access and retrieval costs.

For complaints about privacy, we will establish in consultation with you a reasonable process, including timeframes, for seeking to resolve your complaint.

### **e. For Residents of Mexico**

You have the right to: (i) access your personal data in our possession and know the details of its processing; (ii) rectify your personal data if it is inaccurate or incomplete; (iii) cancel the personal data when you consider it is not required for the purposes set forth in this privacy notice, when it is being used for non-consented purposes, or when the contractual or service relationship has ended, or (iv) oppose to the processing of your personal data for specific purposes (collectively, the “ARCO Rights”).

To exercise your ARCO Rights, you must present a request (the “ARCO Request”) at the address below (see “Data Controller and Contact Information”), along with the following information and documentation. We will respond in accordance with applicable law:

- Your name, address and e-mail for delivery of the response to your ARCO Request;
- Copy of the documents that evidence your identity (copy of your voter’s identification card, passport or other official identification) or, if applicable, the documents that evidence your legal representation;
- A clear and succinct description of the personal data with which you wish to exercise any of the ARCO Rights;
- Any document or information that facilitates the location of your personal data; and
- To rectify your personal data, the modifications to be made and provide the documentation supporting your request.

### **f. For Residents of Turkey**

Under Article 11 of Law No: 6698 on the Protection of Personal Data, you have the following rights as a data subject:

- To receive information as to whether your personal data is processed;
- If your personal data has been processed, to request information with regard to such processing;
- To receive information as to the purposes for which your personal data is processed and whether your data is used for their intended purpose;
- To receive information as to any third parties to whom your personal is disclosed, in Turkey or overseas;
- To request the correction of your personal data if it is processed incompletely or incorrectly, and to request



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notification of any such corrections to third parties to whom your personal data is disclosed;

- To request the deletion or destruction of your personal data in the event the reasons requiring their processing no longer apply, and to request notification thereof to any third parties to whom your personal data is disclosed;
- To object to any unfavorable results of the analysis of your personal data exclusively through automated systems; and
- To request compensation for any damages suffered due to unlawful processing of your personal data.

To exercise any of the above rights, you can contact us by email or postal mail using the contact details for Turkey listed below. (Section X: **“Data Controller and Contact Information”**).

In order to process your application, we need to verify your identity or authority to make the request and confirm that the personal data relates to you. Therefore, any applications for the exercise of these rights should be accompanied with documents that confirm the identity of the applicant (e.g. a valid ID card) For applications made on behalf of a data subject, documents confirming that you have been duly authorized by the relevant individual (e.g. a valid Power of Attorney that includes the power to exercise these rights) should be submitted with your application.

Sonoco will process applications relating to the exercise of the above rights and notify the applicant in writing of the result of their application as soon as practically possible, and in any event no later than in 30 days.

## VII. Third-Party Websites

The Sites and email messages from us may contain links to third-party websites, which may have privacy policies that differ from our own. You should be aware that the collection, retention and use of any data you provide on these websites will be governed by the privacy policy of the company providing the website and not by this Privacy Policy. Sonoco therefore encourages you to read the privacy policies and terms and conditions of linked or referenced websites you enter. These third-party websites may send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data or solicit personal data. SONOCO DOES NOT CONTROL AND IS NOT RESPONSIBLE FOR WHAT THIRD PARTIES DO IN CONNECTION WITH THEIR WEBSITES, OR HOW THEY HANDLE YOUR PERSONAL DATA. PLEASE EXERCISE CAUTION AND CONSULT THE PRIVACY POLICIES POSTED ON EACH THIRD-PARTY WEBSITE FOR FURTHER INFORMATION.

## VIII. Children’s Privacy

Protecting children’s privacy is important to us. We do not direct our Sites to, nor do we knowingly collect any personal data from, children under the age of 13 (or 16 where applicable by law). If we learn that a child has provided personal data to a Site, we will use reasonable efforts to remove such information from the files of such Site. If you believe we might have any information from or about a child, please contact us at [privacy@sonoco.com](mailto:privacy@sonoco.com).

## IX. Data Security

We have taken certain physical, administrative, and technical steps to safeguard the information we collect from and about our customers and Site visitors. While we make every reasonable effort to help ensure the integrity and security of our network and systems, we cannot guarantee our security measures.





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## X. Data Controller and Contact Information

We hope this Privacy Policy answers your questions about our collection, use and disclosure of your personal data. If you have additional questions about this Privacy Policy or the practices described herein, you may contact us at:

- For individuals in the U.S., contact us by postal mail, phone, or email at:  
[privacy@sonoco.com](mailto:privacy@sonoco.com)
- For individuals in the EU or EEA, contact the data controller(s) by postal mail, phone, or email as follows:  
[privacy@sonoco.com](mailto:privacy@sonoco.com)  
Should you have any questions or concerns about this Privacy Policy and our privacy practices, you may also contact the Data Protection Officer of Sonoco at: [dataprivacy.cpe@sonoco.com](mailto:dataprivacy.cpe@sonoco.com).
- For individuals in Australia and New Zealand, contact us by postal mail, phone, or email to:  
[privacy@sonoco.com](mailto:privacy@sonoco.com)
- For individuals in Mexico, contact us by postal mail, phone, or email to:  
[privacy@sonoco.com](mailto:privacy@sonoco.com)
- For individuals in Turkey, contact us by postal mail, phone, or email to:  
[privacy@sonoco.com](mailto:privacy@sonoco.com)

## XI. Revisions to the Privacy Policy

Sonoco reserves the right, at its sole discretion, to change, modify, add, remove, or otherwise revise portions of this Privacy Policy at any time. If we do, we will make you aware of the change(s) on the Sites by including a copy to the previous version of the Privacy Policy. The date this Privacy Policy was last revised is identified at the top of the page. Your continued use of the Sites following the posting of changes to this Privacy Policy means you accept these changes. If we change this Privacy Policy in a material way, we will provide appropriate notice to you.