

Dear Sir or Madame,

following an obligation of the Data Protection Act - REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) please be informed how your personal data are used and what your rights are.

## 1. Your personal data administrator

Your personal data administrator is:

Silgan Closures GmbH

Riesstr. 16, 80992 München, Germany

Contact details: Phone: +49 511 7905 0, E-Mail: [marketing@silgan-closures.com](mailto:marketing@silgan-closures.com)

Website: [www.silgan-closures.com](http://www.silgan-closures.com)

## 2. How your information will be used – the purposes of the processing, legitimate interests

Your personal data is being processed for the purposes of business contact for the reason to provide services or complete your order and if necessary other legally legitimate reasons. We may also contact you to collect your feedback or ask for more details related to the scope of cooperation.

## 3. How your information will be used – recipients of the personal data

Your personal data is processed by the management and administration only. All the processing activities are handled according to the rules established by the personal data protection policy. All the people who process your personal data have written authorization and are trained accordingly to keep your personal data safe and secured. We store the personal information for the time of cooperation.

## 4. Personal data transfers

There is no data transfer to third parties, especially not to another country.

## 5. Further information necessary to ensure fair and transparent processing

1. Much of the information we hold will have been provided by you, but some may come from other sources, such as your manager, or in some cases, external sources, such as referees.
2. We do not use automated decision making, including profiling.

## 6. Your rights

Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data.

1. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.
2. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
3. You have the right to lodge a complaint with a supervisory authority if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

For details related to your rights please find the next page.

Yours faithfully

Silgan Closures GmbH Management

Date	Issued by	Approved by
24.05.2018	COR IMS Coordinator	VP Finance & Administration / Information Services

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**1. Right of confirmation**

Each data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed.

**2. Right of access**

Data subjects have rights to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the regulations grant the data subject access to the following information:

- purposes of the processing;
- categories of personal data concerned;
- recipients or categories of recipients to whom the data have been or will be disclosed, in particular recipients in third countries or international organisations;
- if possible, the envisaged period for which the personal data will be stored, or, if not possible, criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Moreover, the data subject has right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject has the right to be informed of the appropriate safeguards relating to the transfer.

**3. Right to rectification**

Each data subject has right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject has right to have incomplete personal data completed, including by means of providing a supplementary statement.

**4. Right to erasure (Right to be forgotten)**

Each data subject has right to obtain from the controller the erasure of personal data concerning him or her. The controller has the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based and where there is no other legal ground for the processing.
- The data subject objects to the processing and there are no overriding legitimate grounds for the processing.
- The data have been unlawfully processed.
- The data must be erased for compliance with a legal obligation.
- The data have been collected in relation to the offer of information society service.

Silgan Closures GmbH shall promptly ensure that the erasure request is complied with immediately.

**5. Right of restriction of processing**

Each data subject has right to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of data is contested by him/ her, for a period enabling the controller to verify the accuracy of the data.
- The processing is unlawful and she/ he opposes the erasure of data and requests restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

**6. Right to data portability**

Each data subject has right to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she has right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, the data subject has right to have personal data transmitted directly from us to another controller, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

**7. Right to object**

Each data subject has right to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her. This also applies to profiling based on these provisions.

The Silgan Closures GmbH shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

If Silgan Closures GmbH processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to the Silgan Closures GmbH to the processing for direct marketing purposes, the Silgan Closures GmbH will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by the Silgan Closures GmbH for scientific or historical research purposes, or for statistical purposes, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of the Silgan Closures GmbH. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

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