

Privacy Policy

The KB Packaging LLP are very delighted that you have shown interest in their enterprise. Data protection is of a particularly high priority for the management of the KB Packaging LLP. The use of the Internet pages of the KB Packaging LLP is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via the websites, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, the KB Packaging LLP generally obtains consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to the KB Packaging LLP. By means of this data protection declaration, the enterprise would like to inform the general public of the nature, scope, and purpose of the personal data they collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, the KB Packaging LLP has implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed through their websites. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

The KB Packaging LLP also stores and processes information in the office environment using various internal systems. Numerous physical and organisational measures have been implemented to ensure the most complete protection of such personal data. If you require further information on the security of such personal data on internal systems, this is available on a data subject access request.

1. Definitions

The data protection declaration of the KB Packaging LLP is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). This data protection declaration should be legible and understandable for the general public, as well as customers and business partners. To ensure this, the terminology used is explained below.

In this data protection declaration, the following terms, inter alia, are used:

Personal data

Personal data means any information relating to an identified

or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular enquiry in accordance with Union or Member

State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Third party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Name and Address of the controller

The Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

KB Packaging LLP
Merlin Way,
Quarry Hill Industrial Estate
Ilkeston, DE7 4RA
United Kingdom

Phone: 0115 944 1600
Email: info@kbpackaging.com
Websites: www.kbpackaging.com and www.gel-pack.com

3. Contact for Data Protection Issues

The point of contact for data protection for the controller is:

Mr Steve Birch
KB Packaging LLP
Merlin Way,
Quarry Hill Industrial Estate
Ilkeston, DE7 4RA
United Kingdom

Phone: 0115 944 1600
Email: steve.birch@kbpackaging.com
Websites: www.kbpackaging.com and www.gel-pack.com

Any data subject may, at any time, contact Mr Steve Birch directly with all questions and suggestions concerning data protection.

4. Cookies

The Internet pages of the KB Packaging LLP use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognised and identified using the unique cookie ID.

Through the use of cookies, the KB Packaging LLP can provide the users of our websites with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on the websites can be optimised with the user in mind. Cookies allow the KB Packaging LLP, as previously mentioned, to recognise the websites users. The purpose of this recognition is to make it easier for users to utilise the websites. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through the websites by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of the websites may be entirely usable.

5. Collection of general data and information

The websites of the KB Packaging LLP collect a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches the websites (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on the KB Packaging's information technology systems.

When using this general data and information, the KB Packaging LLP does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of the websites correctly, (2) optimise the content of the websites as well as its advertisement, (3) ensure the long-term viability of the information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, the KB Packaging LLP analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of the enterprise, and to ensure an optimal level of protection for the personal data processed. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

6. Registration on our websites

The data subject has the possibility to register on the websites of the controller with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for its own purposes. The controller may request transfer to one or more processors (e.g. a parcel service) that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the websites of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored.

The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offences. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

The data controller shall, at any time, provide information upon request to each data subject as to what personal data are stored about the data subject. In addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations. Mr Steve Birch is particularly designated in this data protection declaration, as well as the entirety of the controller's employees are available to the data subject in this respect as contact persons.

7. Subscription to our newsletters

On the websites of the KB Packaging LLP, users are given the opportunity to subscribe to the enterprise's newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

The KB Packaging LLP informs its customers and business partners regularly by means of a newsletter about enterprise offers. The enterprise's newsletter may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorised to receive the newsletter.

During the registration for the newsletter, the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, is also stored, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition,

subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the websites of the controller, or to communicate this to the controller in a different way.

8. Newsletter-Tracking

The newsletter of the KB Packaging LLP contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, the KB Packaging LLP may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analysed by the controller in order to optimise the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. The KB Packaging LLP automatically regards a withdrawal from the receipt of the newsletter as a revocation.

9. Contact possibility via the websites

The websites of the KB Packaging LLP contain information that enables a quick electronic contact to the enterprise, as well as direct communication with them, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no processing of this personal data by third parties.

10. Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the

purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

11. Rights of the data subject

11. a) Right of confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail themselves of this right of confirmation, he or she may, at any time, contact Mr Steve Birch or another employee of the controller.

11. b) Right of access

Each data subject shall have the right granted by the European legislator 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 European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the 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.

Furthermore, the data subject shall have a 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 shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may at any time contact Mr Steve Birch or another employee of the controller.

11. c) Right to rectification

Each data subject shall have the right granted by the European legislator 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 shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact Mr Steve Birch or another employee of the controller.

11. d) Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have 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 personal data are 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 according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject

wishes to request the erasure of personal data stored by the KB Packaging LLP, he or she may at any time contact Mr Steve Birch or another employee of the controller. Mr Steve Birch or another employee of the KB Packaging LLP shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. Mr Steve Birch or another employee of the KB Packaging LLP will arrange the necessary measures in individual cases.

11. e) Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful, and the data subject opposes the erasure of the personal data and requests the 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 Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by the KB Packaging LLP, he or she may at any time contact Mr Steve Birch or another employee of the controller who will arrange the restriction of the processing.

11. f) Right to data portability

Each data subject shall have the right granted by the European legislator, 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 shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent

pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, 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, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact Mr Steve Birch or another employee designated by the KB Packaging LLP.

11. g) Right to object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

The KB Packaging LLP shall no longer process the personal data in the event of the objection, unless they 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 defence of legal claims.

If the KB Packaging LLP 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 KB Packaging LLP to the processing for direct marketing purposes, the KB Packaging LLP 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 KB Packaging LLP for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, 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 directly contact Mr Steve Birch or another employee of the KB Packaging LLP. 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.

11. h) Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, the KB Packaging LLP shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may at any time directly contact Mr Steve Birch or another employee of the KB Packaging LLP.

11. i) Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may at any time directly contact Mr Steve Birch or another employee of the KB Packaging LLP.

12. Data protection for applications and the application procedures

The data controller shall collect and process the personal data of applicants for the purpose of the processing of the application procedure. The processing may also be carried out electronically. This is the case, in particular, if an applicant submits corresponding application documents by e-mail or by means of a web form on the websites to the controller. If the data controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements.

If no employment contract is concluded with the applicant by the controller, the application documents shall be automatically

erased two months after notification of the refusal decision, provided that no other legitimate interests of the controller are opposed to the erasure. Other legitimate interest in this relation is, e.g. a burden of proof in a procedure under the General Equal Treatment Act (AGG).

13. Data protection provisions about the application and use of Google Analytics (with anonymisation function)

On its websites, the controller has integrated the component of Google Analytics (with the anonymiser function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behaviour of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimisation of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA, United States of America

For the web analytics through Google Analytics the controller uses the application “_gat._anonymizelp”. By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymised when accessing the websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the traffic on the websites. Google uses the collected data and information, inter alia, to evaluate the use of the websites and to provide online reports, which show the activities on the websites, and to provide other services concerning the use of the Internet sites for the controller.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyse the use of the websites. With each call-up to one of the individual pages of the Internet sites, which are operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits to the websites by the data subject. With each visit to the Internet sites, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through the websites at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of the websites, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits to Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

14. Data protection provisions about the application and use of Google-AdWords

On its websites, the controller has integrated Google AdWords. Google AdWords is a service for Internet advertising that allows the advertiser to place ads in Google search engine results and the Google advertising network. Google AdWords allows an advertiser to pre-define specific keywords with the help of which an ad on Google's search results only then displayed, when the user utilises the search engine to retrieve a keyword-relevant search result. In the Google Advertising Network, the ads are

distributed on relevant web pages using an automatic algorithm, taking into account the previously defined keywords.

The operating company of Google AdWords is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA, United States of America.

The purpose of Google AdWords is the promotion of the websites by the inclusion of relevant advertising on the websites of third parties and in the search engine results of the search engine Google.

If a data subject reaches the websites via a Google ad, a conversion cookie is filed on the information technology system of the data subject through Google. The definition of cookies is explained above. A conversion cookie loses its validity after 30 days and is not used to identify the data subject. If the cookie has not expired, the conversion cookie is used to check whether certain sub-pages, e.g. the shopping cart from an online shop system, were called up on the websites. Through the conversion cookie, both Google and the controller can understand whether a person who reached an AdWords ad on the websites generated sales, that is, executed or cancelled a sale of goods.

The data and information collected through the use of the conversion cookie is used by Google to create visit statistics for our websites. These visit statistics are used in order to determine the total number of users who have been served through AdWords ads to ascertain the success or failure of each AdWords ad and to optimise the AdWords ads in the future. Neither the KB Packaging LLP nor other Google AdWords advertisers receive information from Google that could identify the data subject.

The conversion cookie stores personal information, e.g. the Internet pages visited by the data subject. Each time the Internet pages are visited, personal data, including the IP address of the Internet access used by the data subject, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, at any time, prevent the setting of cookies by our websites, as stated above, by means of a corresponding setting of the Internet browser used and thus permanently deny the setting of cookies. Such a setting of the Internet browser used would also prevent Google from placing a conversion cookie on the information technology system of the data subject. In addition, a cookie set by Google AdWords may be deleted at any time via the Internet browser or other software programs.

The data subject has a possibility of objecting to the interest-based advertisement of Google. Therefore, the data subject must

access from each of the browsers in use the link www.google.de/settings/ads and set the desired settings.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/>.

15. Data protection provisions about the application and use of Instagram

On its websites, the controller has integrated components of the service Instagram. Instagram is a service that may be qualified as an audio-visual platform, which allows users to share photos and videos, as well as disseminate such data in other social networks.

The operating company of the services offered by Instagram is Instagram LLC, 1 Hacker Way, Building 14 First Floor, Menlo Park, CA, UNITED STATES.

With each call-up to one of the individual pages of the Internet sites, which are operated by the controller and on which an Instagram component (Insta button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding Instagram component of Instagram. During the course of this technical procedure, Instagram becomes aware of what specific sub-page of the websites were visited by the data subject.

If the data subject is logged in at the same time on Instagram, Instagram detects with every call-up to the websites by the data subject—and for the entire duration of their stay on the Internet sites—which specific sub-page of the Internet pages was visited by the data subject. This information is collected through the Instagram component and is associated with the respective Instagram account of the data subject. If the data subject clicks on one of the Instagram buttons integrated on the websites, then Instagram matches this information with the personal Instagram user account of the data subject and stores the personal data.

Instagram receives information via the Instagram component that the data subject has visited the websites provided that the data subject is logged in at Instagram at the time of the call to the websites. This occurs regardless of whether the person clicks on the Instagram button or not. If such a transmission of information to Instagram is not desirable for the data subject, then he or she can prevent this by logging off from their Instagram account before a call-up to the websites is made.

Further information and the applicable data protection provisions of Instagram may be retrieved under <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

16. Data protection provisions about the application and use of Jetpack for WordPress

On the website www.gel-pack.com, the controller has integrated Jetpack. Jetpack is a WordPress plug-in, which provides additional features to the operator of a website based on WordPress. Jetpack allows the Internet site operator, inter alia, an overview of the visitors of the site. By displaying related posts and publications, or the ability to share content on the page, it is also possible to increase visitor numbers. In addition, security features are integrated into Jetpack, so a Jetpack-using site is better protected against brute-force attacks. Jetpack also optimises and accelerates the loading of images on the website.

The operating company of Jetpack Plug-Ins for WordPress is the Automattic Inc., 132 Hawthorne Street, San Francisco, CA 94107, UNITED STATES. The operating enterprise uses the tracking technology created by Quantcast Inc., 201 Third Street, San Francisco, CA 94103, UNITED STATES.

Jetpack sets a cookie on the information technology system used by the data subject. The definition of cookies is explained above. With each call-up to one of the individual pages of the Internet site, which is operated by the controller and on which a Jetpack component was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to submit data through the Jetpack component for analysis purposes to Automattic. During the course of this technical procedure Automattic receives data that is used to create an overview of website visits. The data obtained in this way serves the analysis of the behaviour of the data subject, which has access to the Internet page of the controller and is analysed with the aim to optimise the website. The data collected through the Jetpack component is not used to identify the data subject without a prior obtaining of a separate express consent of the data subject. The data comes also to the notice of Quantcast. Quantcast uses the data for the same purposes as Automattic.

The data subject can, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Automattic/Quantcast from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Automattic/Quantcast may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data relating to a use of the Internet site that are generated by the Jetpack cookie as well as the processing of these data by Automattic/Quantcast and the chance to preclude any such. For this purpose, the data subject must press the 'opt-out' button under the link <https://www.quantcast.com/opt-out/> which sets an opt-out cookie. The opt-out cookie set with this

purpose is placed on the information technology system used by the data subject. If the cookies are deleted on the system of the data subject, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not fully usable anymore by the data subject.

The applicable data protection provisions of Automattic may be accessed under <https://automattic.com/privacy/>. The applicable data protection provisions of Quantcast can be accessed under <https://www.quantcast.com/privacy/>.

17. Data protection provisions about the application and use of LinkedIn

The controller has integrated components of the LinkedIn Corporation on its websites. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts. Over 400 million registered people in more than 200 countries use LinkedIn. Thus, LinkedIn is currently the largest platform for business contacts and one of the most visited websites in the world.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

With each call-up to one of the individual pages of the Internet sites, which are operated by the controller and on which a LinkedIn component (LinkedIn plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding LinkedIn component of LinkedIn. Further information about the LinkedIn plug-in may be accessed under <https://developer.linkedin.com/plugins>. During the course of this technical procedure, LinkedIn gains knowledge of what specific sub-page of the websites was visited by the data subject.

If the data subject is logged in at the same time on LinkedIn, LinkedIn detects with every call-up to the websites by the data subject—and for the entire duration of their stay on the Internet sites—which specific sub-page of the Internet page was visited by the data subject. This information is collected through the LinkedIn component and associated with the respective LinkedIn account of the data subject. If the data subject clicks on one of the LinkedIn buttons integrated on the websites, then LinkedIn assigns this information to the personal LinkedIn user account of the data subject and stores the personal data.

LinkedIn receives information via the LinkedIn component that the data subject has visited the websites, provided that the data

subject is logged in at LinkedIn at the time of the call-up to the websites. This occurs regardless of whether the person clicks on the LinkedIn button or not. If such a transmission of information to LinkedIn is not desirable for the data subject, then he or she may prevent this by logging off from their LinkedIn account before a call-up to the websites is made.

LinkedIn provides under <https://www.linkedin.com/psettings/guest-controls> the possibility to unsubscribe from e-mail messages, SMS messages and targeted ads, as well as the ability to manage ad settings. LinkedIn also uses affiliates such as Eire, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame. The setting of such cookies may be denied under <https://www.linkedin.com/legal/cookie-policy>. The applicable privacy policy for LinkedIn is available under <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn Cookie Policy is available under <https://www.linkedin.com/legal/cookie-policy>.

18. Data protection provisions about the application and use of Twitter

On its websites, the controller has integrated components of Twitter. Twitter is a multilingual, publicly-accessible microblogging service on which users may publish and spread so-called 'tweets,' e.g. short messages, with limited characters. These short messages are available for everyone, including those who are not logged on to Twitter. The tweets are also displayed to so-called followers of the respective user. Followers are other Twitter users who follow a user's tweets. Furthermore, Twitter allows you to address a wide audience via hashtags, links or retweets.

The operating company of Twitter is Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, UNITED STATES.

With each call-up to one of the individual pages of the Internet sites, which are operated by the controller and on which a Twitter component (Twitter button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Twitter component of Twitter. Further information about the Twitter buttons is available under <https://about.twitter.com/de/resources/buttons>. During the course of this technical procedure, Twitter gains knowledge of what specific sub-page of the websites was visited by the data subject. The purpose of the integration of the Twitter component is a retransmission of the contents of the websites to allow the users to introduce the web page to the digital world and increase the visitor numbers.

If the data subject is logged in at the same time on Twitter, Twitter detects with every call-up to the websites by the data subject and for the entire duration of their stay on the Internet site which specific sub-page of the Internet page was visited by the data subject. This information is collected through the Twitter component and associated with the respective Twitter

account of the data subject. If the data subject clicks on one of the Twitter buttons integrated on the websites, then Twitter assigns this information to the personal Twitter user account of the data subject and stores the personal data.

Twitter receives information via the Twitter component that the data subject has visited the websites, provided that the data subject is logged in on Twitter at the time of the call-up to the websites. This occurs regardless of whether the person clicks on the Twitter component or not. If such a transmission of information to Twitter is not desirable for the data subject, then he or she may prevent this by logging off from their Twitter account before a call-up to the websites is made.

The applicable data protection provisions of Twitter may be accessed under <https://twitter.com/privacy?lang=en>.

19. Payment Method: Data protection provisions about the use of Sage Pay as a payment processor

On the KB Packaging website, the controller has integrated Sage Pay. Sage Pay is an online payment service provider, which allows processing of payments online. Sage Pay also offers other services, such as buyer protection and identity or creditworthiness checks.

The operating company of Sage Pay is Sage Group plc, North Park, Newcastle upon Tyne, NE13 9AA.

By selecting the Sage Pay payment option, the data subject agrees to transmission of personal data required for the processing of the purchase, or identity and creditworthiness checks.

The personal data transmitted to Sage Pay is usually first name, surname, address, email address, IP address, telephone number, mobile phone number, as well as other data necessary for the processing of the purchase. The processing of the purchase contract also requires such personal data, which are in connection with the respective order. In particular, the exchange of payment information such as bank details, card number, date of validity and CVC code, cumulative number, item number, data on goods and services, prices and taxes.

The purpose of the transmission of the data is, in particular, the identification check, payment administration, and fraud prevention. The controller shall provide Sage Pay with personal data, in particular, if a legitimate interest in the transmission exists. The personal data exchanged between Sage Pay and the data subject for the data processing shall be transmitted by Sage Pay for authorisation from the Merchant (vendors) and Card Issuing (shoppers) bank. This transmission is intended for identity and creditworthiness checks.

Sage Pay may also pass on the personal data to affiliates (Sage Group plc) and service providers or subcontractors as far as this

is necessary to fulfil contractual obligations or to process the data in the order.

The applicable data protection provisions of Sage Pay may be retrieved under <https://www.sagepay.co.uk/policies/privacy-policy>

20. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which consent is obtained for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR.

The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of enquiries concerning products or services. If the KB Packaging LLP subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured on the site of the KB Packaging LLP and their name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party.

Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by the KB Packaging LLP or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. This is considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

21. The legitimate interests pursued by the controller or by a third party

Where the processing of personal data is based on Article 6(1) lit. f GDPR the legitimate interest is to carry out business in favour of the well-being of all employees and shareholders.

22. Period for which the personal data will be stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period or as determined necessary by the KB Packaging LLP. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract.

23. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data

The KB Packaging LLP clarifies that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides personal data, which must subsequently be processed by the KB Packaging LLP. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact Mr Steve Birch. Mr Steve Birch clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

24. Existence of automated decision-making

As a responsible company, the KB Packaging LLP do not use automatic decision-making or profiling.

This Privacy Policy has been adapted from a Policy generated by the Privacy Policy Generator of the External Data Protection Officers that was developed in cooperation with RC GmbH, which sells used notebooks and the Media Law Lawyers from WBS-LAW.