

DETAILED INFORMATION ON WEBSITE DATA PROTECTION & PRIVACY

Confidentiality and Data Protection

TEMPACK Packaging Solutions, S.L (hereinafter the Entity), is committed to due diligence and compliance with data protection regulations. As the foundation for this duty and commitment a Data Protection Channel has been incorporated (DATAPROTECT line) together with DATAPROTECT CARE accreditation, which combine to provide the essential elements for data protection; all managed, supervised and certified by BONET consulting, a leading firm specializing in Regulation Compliance and Data Protection.

Below we will present detailed information on the confidentiality and data protection policy in compliance with the terms of article 13 of (EU) Regulation 2016/679 of the European Parliament and the Council, dated 27th April 2016, relating to the protection of individuals in regard to the processing of personal data and the free circulation of such information. (**General Data Protection Regulation, or the GDPR**)

Contact details of the controller and Data Protection Officer (RPD):

- > **Identity:** TEMPACK PACKAGING SOLUTIONS, S.L
- > **Address/Postcode:** AV. PAU CASALS, 61 · 08907 L'HOSPITALET DE LLOB.
(BARCELONA) · SPAIN
- > **Telephone:** +34 93 366 10 25
- > **E-mail:** info.tempack@softboxsystems.com
- > **RPD contact details:** TempackGDPR@softboxsystems.com
- > **Data Protection Channel:** <https://www.corporate-ethicline.com/tempack>

Purposes of Processing

The Entity will process the information supplied by data subjects for the following purposes:

- > **Managing** customer service, visits and meetings at our installations, as well as the management and performance of contracted products & services.
- > **Managing all types of applications, suggestions or requests** related to our professional services formulated by the data subjects.
- > **Informative and commercial communications:** Processing of your data for the purpose of keeping you updated on our activities, articles of interest and general information related to our business and the products and services contracted.
- > **Managing data supplied by candidates for an employment position via their Curriculum Vitae (CV)** for selection and recruitment purposes.
- > Guarantee the security of offices, facilities and people through **access controls and video surveillance systems.**
- > **Comply with the legal provisions** that apply to the Entity and its activities **in terms of health and occupational risk prevention.**
- > **To manage and control the functioning of the internal mechanisms, policies and protocols** established by the Entity **for the purposes of regulatory compliance and the management of the complaints channels** for this purpose.
- > **All those processing operations that are applicable to us for due compliance with the regulations and official / sectorial requirements** to which our activity is subject.

For the efficient conduct of customer service and management of the purposes listed above, the data subject agrees to the processing of their data for the specified ends, all under the strictest compliance with data protection regulations and the terms of the policy we are detailing herein. You have the right to exercise your rights at any time; please see the related section below.

Criteria for the retention of data

- > **Management of products and services contracted with the entity:** The personal data provided within agreements, service offers and proposals, as well as those of other individuals necessarily involved in procedures, will be retained for the length of time that the contracted services remain in force. On the termination of the contracted services, personal data will be retained in accordance with the responsibilities which may correspond to the entity and/or in compliance with any other regulatory frameworks or legal requirements applicable to the entity under the Law, and which demand the retention of such data. Personal data will be retained in a manner which permits the identification and exercise of Rights of the data subjects and in line with the legally

specified technical and organizational measures necessary to guarantee the confidentiality and integrity of the same.

- > **Management of CVs:** As a rule the Entity will retain your CV for a maximum of one year, and after this time it will be automatically destroyed in accordance with data quality procedure.
- > **Management of Employment Contracts:** personal data will be kept, in any case, for the duration of the employment relationship and, at the end of the same, in the cases in which responsibilities may arise between the parties and when required by a regulation with the status of law.
- > **Others:** All remaining data and information supplied by the user in whatever format will be retained for the time necessary to comply with the purposes for which it was collected.

Legitimization

The legal basis permitting the Entity to process the personal data of users, clients and potential clients is provided by virtue of the following:

- > The Consent of data subjects provided in order to process and manage requests for information or queries regarding our products and services.
- > The Consent provided by Candidates for employment positions for the purposes of selection and recruitment.
- > The framework of the supply and/or contracting of products & services with the Entity.
- > The Legitimate interest of sending you informative and commercial communications and/or promotional offers related to the business activity of the entity and the contracted products & services via E-mail or any other format.
- > Compliance with legal obligations and internal regulatory compliance procedures.
- > Legitimate interest in guaranteeing the security of the offices, facilities and people.

Recipients

No personal data will be released to third parties except by legal stipulation.

Origin

The personal data will be obtained directly from the data subjects and our partners. The categories of personal data supplied to us by our partners are as follows:

- > Identification data.
- > Postal or E-mail addresses.
- > Data provided and/or consented by the data subjects related to and necessary for the management and performance of the products & services requested.

Rights

Right of Access, Rectification and Erasure: The data subjects have the right to obtain confirmation from TEMPACK PACKAGING SOLUTIONS, S.L. as to whether we are processing personal data that concerns them or not.

The data subjects have the right to access their personal data, as well as requesting the rectification of inaccurate data or, as applicable, to request its elimination when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

Right to Limitation and Opposition: In certain circumstances, the data subjects may request the limitation of the processing of their data, in which case we will only retain it for the exercise and defense of claims. In certain circumstances, and for reasons related to specific circumstances, the data subjects may oppose the processing of their data. TEMPACK PACKAGING SOLUTIONS, S.L. will in this event cease to process the data, except for compelling legitimate reasons, or in the exercise or defense of possible claims.

The said rights may be executed on our data protection channel; please see the related section below.

Data Protection Channel / DATAPROTECT - line

TEMPACK PACKAGING SOLUTIONS, S.L. has implemented a Data Protection Channel, to ensure the highest levels of commitment, thoroughness and professionalism in matters of security, experience, Independence and know-how in the processing of all communications received.

The Data Protection Channel has been set up via a web platform, designed and managed by an independent external expert, to provide you with and ensure all the above commitments.

Via the Data Protection Channel, **you will be able to communicate and process** the exercise of your **Rights** (see section above) and notify us of any signs or knowledge of **possible breaches of security** and/or **possible non-compliance or irregularities regarding data protection regulations** or the **present policy** of the Entity.

Access data for the channel are listed at the head of this policy.

Customer service and assistance

All data subjects may contact the Entity with any queries in relation to the processing of their personal data or the interpretation of our policy, by getting in touch with the controller at the address listed at the head of this Policy document.