



CANPACK GROUP

PRIVACY POLICY FOR JOB CANDIDATES

Scope and purpose. Recruitment account

CANPACK Group is a leading manufacturer in the beverage packaging industry, glass and metal packaging and also crown caps. CANPACK is committed to conduct its business in compliance with applicable privacy and data protection law on every stage of its activity.

This Privacy Policy explains for what purposes and how CANPACK collects personal data about job candidates as well as how we protect the personal data and for how long we will retain it and what rights the data subjects have under applicable data privacy laws, as part of the recruitment process.

If you wish to apply for a position in CANPACK, you need to create an account on our recruitment platform (the “**Account**”) where your job application, resume (CV) and other data related to your recruitment process will be kept according to the principles contained herein.

You may at any time delete the Account. You do so by clicking "Delete my account" button. In response to your request, the platform administrator shall remove the Account including all your personal data and CV. Please note that the Account and the data shall not be removed automatically.

Deletion of your information from CANPACK recruitment platform means that you will not be able to log back into your Account, and will be requested to create a new one if you wish to apply to CANPACK again in the future.

[If you apply to CANPACK Poland entity, please read the Privacy Policy Regarding Recruitment to CANPACK Poland.](#)

[If you apply to CANPACK Colombia, please read the Privacy Policy Regarding Recruitment to CANPACK Colombia.](#)

I. PRIVACY POLICY REGARDING RECRUITMENT TO POLISH AFFILIATES

1. Identity and contact details of the data controller

The Data Controller of the personal data within the meaning of the 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 (the „GDPR”), contained in the resume, cover letter and in the application form of the job candidate (the „Candidate”), is CANPACK Group company with registered seat in Poland conducting a given recruitment process indicated in the job offer, i.e.:

CANPACK S.A. with registered seat in Krakow, ul. Jasnogórska 1, 31-358 Krakow, Tax Identification Number: 677-004-67-39, registered in National Court Register under the number KRS 0000005418, at the District Court for Krakow Business Department XI, stock capital: 121 201 120,00 PLN, paid capital: 121 201 120,00 PLN, contact: data.protection@canpack.com or

CAN-PACK Metal Closures sp. z o.o. with registered seat in Krakow, ul. Jasnogórska 1, 31-358 Krakow, Tax Identification Number: 869-186-57-34, registered in National Court Register under the number KRS 0000252268 at the District Court for Krakow Business Department XI, stock capital: 94 697 500,00 PLN, contact: data.protection@canpack.com or

CP Glass S.A. with registered seat in Krakow, ul. Jasnogórska 1, 31-358 Krakow, Tax Identification Number: 869-000-32-26, at the District Court for Krakow Business Department XI, stock capital: 50 099 340,00 PLN, paid capital: 50 099 340,00 PLN, contact: data.protection@canpack.com or

CAN-PACK FIP sp. z o.o. with registered seat in Dębica, ul. Mościckiego 23, 39-200 Dębica, Tax Identification Number: 872-222-84-78, registered in National Court Register under the number KRS 0000228547 at the District Court for Rzeszow Business Department XII, stock capital: 75 853 000 PLN, contact: data.protection@canpack.com or

CANPACK Recycling SP. Z O.O. with registered seat in Krakow, ul. Jasnogórska 1, 31-358 Krakow, Tax Identification Number: 531 158 30 06, registered in National Court Register under the number KRS 0000230054, at the District Court for Krakow Business Department XI, stock capital: 500 000,00 PLN, contact: data.protection@canpack.com

(each separately referred to as the “Data Controller”).

As part of a specific recruitment procedure where an employee is being recruited for a managerial position, CANPACK S.A. and/or CANPACK Group parent company Giorgi Global Holdings, Inc. Delaware, USA corporation with its corporate office at 301 North Market Street, Suite 1414, Wilmington, Delaware 19801, may take part in the decision making process, acting as joint controllers of such Candidate’s personal data together with a given Data Controller (company recruiting for a given position). CANPACK S.A. and Giorgi Global Holdings, Inc. participate in the above recruitment process under internal recruitment policy as part of corporate governance over its subsidiaries.

CANPACK S.A. has been designated as contact point for data subjects with the reservation that data subjects can exercise their rights under the GDPR vis-à-vis each individual Data Controller.

With respect to data protection obligations arising out of the GDPR each of which has been enlisted in this Policy (such as valid legal grounds for processing and transferring the data outside European Economic Area, ensuring the rights of the data subjects, data security, engagement of data processors, handling the data breaches), each Data Controller is responsible for compliance according to this Policy.

2. Purposes and the legal basis for the processing

The legal basis for the processing depends on the personal data concerned and the specific context in which the Data Controller collects it.

Based on the Polish Labour Code the Candidate is obliged to provide to the Data Controller the personal data indicated therein (such as for example: name and surname, date of birth, education, previous job experience, etc.).

Personal data beyond the above catalogue indicated in the Labour Code (e.g. additional data contained in the resume, results of tests carried out as part of a recruitment process, availability, authorization to perform work, work shift preferences) may be processed solely based on Candidate's consent for the processing. Therefore, if the Candidate wishes that such personal data were processed by the Data Controller he/she has to consent to their processing. By selecting appropriate box in the application form, the Candidate gives his/her consent to the processing of his/her personal data beyond the catalogue of data which the Data Controller may request based on the Polish Labour Code, for purposes of conducting the recruitment process, as part either current or also future recruitment processes.

The Candidate is not obliged to provide the Data Controller with the personal data beyond the above catalog and their provision is voluntary. Failure to provide such data may prevent Candidate's participation in the recruitment process.

The Data Controller may also process the personal data in its legitimate interest, in particular where processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

CANPACK S.A. and Giorgi Global Holdings, Inc. process the personal data as joint controllers when involved in particular recruitment processes, in their legitimate interest, as part of corporate governance over its subsidiaries.

3. Recipients of the personal data

Recipients of Candidate's personal data may be:

- CANPACK S.A. and Giorgi Global Holdings, Inc. acting as the joint controllers in the recruitment processes regarding managerial positions;

- CANPACK S.A. providing recruitment services to its affiliates;
- Data Controllers mentioned in Section 1 (if not recruiting for a given position) as well as CANPACK Colombia S.A.S., Zona Franca Tocancipá Km 1.5 Vía Briceño – Zipaquirá, Vereda Verganzo, Tibitoc, Tocancipá, ET5, Colombia, registered in the Chamber of Commerce the 26th of September of 2017 under the number 02262465 of the book IX, identified with NIT. 901121179-7 whose selected HR employees may have access to CANPACK Group recruitment database;
- Entities providing different services to the Data Controller, including IT services, cloud services providers like Workday Limited with registered seat in Ireland which maintains the recruitment platform as well as services related to recruitment like for example assessment of language level, carrying out other assessments for a given position.

The services providers engaged by the Data Controller process the personal data according to relevant data processing agreements ensuring confidentiality and security of the data according to the GDPR.

The personal data MAY BE transferred outside the European Economic Area in particular to the United States of America or to Colombia according to standard contractual clauses for protection of personal data approved by the European Commission, providing appropriate and suitable safeguards for the transfer. These standardized contractual clauses provide sufficient safeguards to meet the adequacy and security requirements of the European General Data Protection Regulation. You can find the standard contractual clauses on the European Commission web-site: <https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX:32010D0087>.

Candidates may receive a copy of their personal data transferred outside the EEA at data.protection@canpack.com.

Personal data will be made available to the following categories of recipients:

- HR employees taking care of the recruitment processes,
- employees of other departments involved in the recruitment process,
- Group officers involved in particular recruitment process
- recruitment process systems operators.

4. Period for which the personal data will be stored

Candidates' personal data will be stored:

- for one month after the completion of the recruitment process for the position the Candidate applied for;
- until withdrawal of the consent if the Candidate has given consent to the processing for future recruitment processes.

5. Security

CANPACK has applied adequate organizational and technical measures in order to ensure that the personal data are protected in accordance with applicable data privacy laws. Those measures shall be reviewed and updated where necessary.

6. Candidate's rights

The Candidate has a right of access to his/her personal data, rectification of his/her personal data, erasure of his/her personal data, right to restriction of processing, right to data portability and right to object to processing.

Candidate has the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Candidate has also a right to lodge a complaint with the supervisory authority.

II. PRIVACY POLICY REGARDING RECRUITMENT AT CANPACK COLOMBIA

This Privacy Policy regards the recruitment procedure at **CANPACK Colombia S.A.S.**, Zona Franca Tocancipá Km 1.5 Vía Briceño – Zipaquirá, Vereda Verganzo, Tibitoc, Tocancipá, ET5, Colombia, registered in the Chamber of Commerce the 26th of September of 2017 under the number 02262465 of the book IX, identified with NIT. 901121179-7.

By selecting the relevant box in the application form, the person applying for a given position (the “Candidate”) accepts the terms and conditions of this Privacy Policy regarding Recruitment at CANPACK Colombia, as well as explicitly authorizes CANPACK COLOMBIA S.A.S to:

- collect, process and transfer his/her personal data processed with respect to the recruitment process (either current or also future – depending on the Candidate’s preference) for the period necessary to achieve the said purpose or for the maximum period permissible under applicable law. The consent also covers the sensitive data such as but not limited to photos, identity documents and the Candidate’s fingerprints, for security purposes, information validation, including biometric identification system;
- if necessary within the framework of the recruitment process, collect, process and transfer his/her personal data (including sensitive data) for the purpose indicated above as a result of which and to the extent permitted by applicable law, CANPACK COLOMBIA S.A.S may take all necessary measures to achieve the said purpose, such as, among others: (i) carry out the necessary activities required in the recruitment process; (ii) access and consult the personal data (private, semi-private, sensitive or reserved) that is kept in databases or files of any public or private entity, whether national, international or foreign; (iii) process the personal data directly or through a data processor located in Colombia or any other country, whom the Candidate authorizes to supply his/her personal data or make the necessary international transfer, as appropriate, to carry out data processing on behalf of CANPACK COLOMBIA SAS; (iv) supply, share, send or deliver the personal data to its affiliates, subsidiaries, related companies located in Colombia or any other country. The preceding sentence also concerns CANPACK COLOMBIA’s partner, client, supplier or any other entity with which CANPACK COLOMBIA S.A. has any contractual relationship, employee fund, etc.

The above authorization includes the information that the Candidate has provided and will provide in the future verbally or in writing (resume, special forms, etc.), either directly or through any platform, social network or technological means that is used in connection with the recruitment process in which he/she is participating.

By selecting the relevant box in the application form, the Candidate also acknowledges that he/she was clearly and expressly informed about the following:

- Treatment and purpose: The data collected will be treated in a fair and lawful manner. By virtue of the foregoing, CANPACK COLOMBIA S.A.S. may use Candidate's personal data with respect to the recruitment process in particular for the following purposes: (i) compliance with the instructions of the competent judicial and administrative authorities; (ii) transfers to any entity that is related to CANPACK COLOMBIA S.A.S., in particular to CANPACK S.A. with its corporate office at Jasnogórska 1, Street, 31-358 Kraków and/or CANPACK Group parent company Giorgi Global Holdings, Inc. Delaware, USA corporation with its corporate office at 301 North Market Street, Suite 1414, Wilmington, Delaware 19801; (iii) maintaining contact information that allows action in case of an emergency the Candidate may suffer; (iv) evaluating and determining the viability of contracting with CANPACK COLOMBIA S.A.S.; (v) keeping the data for possible future recruitment processes if the Candidate agreed so; (vi) carrying out the security study through the company that CANPACK COLOMBIA S.A.S. considers;
- Identification and contact details of the Data Controller: (i) Name of the company: CANPACK COLOMBIA S.A.S; (ii) Email address: MARIA.VISBAL@CANPACK.COM or SORAYA.BARBOSA@CANPACK.COM; (iii) Telephone: (+57) (031) 8786817;
- Rights of the data owner: As the owner of personal data, the Candidate has the rights specifically provided for in article 8 of Law 1581 of 2012, which the Candidate has previously read.

It is expressly stated that this Policy does not constitute any obligation of CANPACK COLOMBIA S.A.S to enter into an employment, apprenticeship or other contract with the Candidate.