

# Privacy notice

Greif, Inc. intends to comply with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Greif, Inc. intends to be certified by the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

## Use of Personal Data:

Your personal data is only used in accordance with this notice and the applicable data privacy laws and no further usage or disclosure will take place without your explicit consent.

Greif is committed to protecting the privacy of visitors to the Greif website and will not use any personal information for any purpose other than Greif's internal use, unless you choose to be added to certain mailing lists (this is a choice you make when you fill out a form on the website).

## Types of Information and Purpose for Processing:

### Anonymous Information

When you visit Greif's website, Greif will automatically collect general information on the visitor activity to the Greif website by using IP addresses and setting temporary cookies to track user sessions. This data allows Greif to keep track of the number of visitors and helps Greif run and constantly improve the performance, content and functionalities of the Greif website. This information is analyzed in anonymous form. Greif may pass on data to external service providers in order to effectively run the website. Greif has taken technical and organizational measures to ensure that the data protection regulations are observed by these external service providers. Please also see the section Cookies for more information.

### Registration Information

If you provide Greif with your email address or other personal information (for example, when you fill out a form or when you request to download brochures or product sell sheets), this information will be used to process any orders or to initiate contact with you by Greif only. You may be offered the choice of being added to email or postal mailing lists, but you are not required to do so.

Please be aware that once you provide us with your email address, you become a "known user" and the Greif website contains a web beacon that collects information on the usage of known users, which is used by Greif to provide you with more information on topics that appear to be of interest to you. If you wish, you can become an anonymous user again by clearing your browser settings.

## Cookies

The Greif website drops Cookies only for an application or service which we provide and if they are important for the proper functioning of specific services. If you wish to opt out of the advantages of the Cookies used, please refer to the privacy settings (and the "help" functionality) of your Internet browser.

## Notice.

Greif will notify you about the purposes for which Greif handles and uses information about you, the types of third parties to which Greif discloses that information, and the choices and means, if any, Greif offers individuals for limiting the use and disclosure of their personal information.

#### Choice.

Greif will give you the opportunity to choose (opt-out) whether your personal information will be disclosed to a third party or used for a purpose incompatible with the purpose for which it was originally collected or subsequently authorized by you. For human resources information, Greif will get your affirmative (opt-in) consent if the information is to be disclosed to a third party or used for a purpose other than its original purpose or a purpose authorized subsequently by you.

#### Accountability for Onward Transfer (Transfers to Third Parties).

Greif will apply the notice and choice principles above if Greif discloses information to a third party. If Greif transfers information to a third party that is acting as our agent, Greif will require the third party to have adequate privacy protection as is required by the relevant Privacy Shield Principles. With respect to onward transfers, Greif remains liable under the Principles if our agent processes personal information in a manner inconsistent with the Principles, unless Greif proves that it is not responsible for the event giving rise to the damage.

#### Data Integrity and Purpose Limitation.

Greif will take reasonable steps to ensure that data is reliable for its intended use, and is accurate, complete, and current. Greif will take precautions to assure the personal information is relevant for the purposes for which it is to be used. In certain situations, Greif may be required to disclose personal data in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements.

#### Access.

You may access your personal information that Greif holds, and you may correct, amend, or delete that information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the privacy risks in question, or where the rights of persons other than you would be violated. To access, correct, or update your personal information, please email us at [LegalCompliance@Greif.com](mailto:LegalCompliance@Greif.com). Please include "My Personal Information under Privacy Shield" in the subject line.

#### Recourse.

In compliance with the Privacy Shield Principles, Greif commits to resolve complaints about our collection or use of your personal information. European Union and Swiss individuals with Privacy Shield inquiries or complaints regarding our Privacy Shield policy should first contact Greif via e-mail at [DataPrivacyTeam@greif.com](mailto:DataPrivacyTeam@greif.com). For unresolved Privacy Shield complaints regarding non-human resources information, Greif has committed to refer those complaints to the International Centre for Dispute Resolution, the international division of the American Arbitration Association (ICDR/AAA), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please contact ICDR/AAA at <http://info.adr.org/safeharbor> for more information or to file a complaint. The services of ICDR/AAA are provided at no cost to you.

With regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship, Greif commit to cooperating with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC), and complying with the advice given by such authorities.

You may have the ability, under certain conditions, to invoke binding arbitration with a Privacy Shield Panel for complaints regarding Greif's Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. For additional information regarding this arbitration, please visit: <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

#### Enforcement and Liability.

The Federal Trade Commission has jurisdiction over Greif's compliance with the Privacy Shield.

#### Storage, retention and security

Greif stores personal data for as long as it is necessary to perform the services you requested and in compliance with Greif's data retention policies and the retention periods required by law.

Greif take reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Greif limits access to your personal information to those personnel who have a specific business purpose for maintaining and processing such information. Individuals who have been granted access to your personal information agree to protect the security, confidentiality and integrity of that information.

In certain situations, Greif may be required to disclose personal data in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements.

#### Transfer of data outside of the European Union

Please be aware that this is Greif's global website and that information you submit will be transferred to the United States of America. Greif, Inc. is registered under the EU/US Privacy Shield framework.

#### Third-Party websites and this privacy notice

Please be aware that other third party websites that may be accessed through our website may collect personally identifiable information about you. The data privacy practices of those third party websites are not covered by this privacy notice.

Technological changes related to the development of the Internet and changes in the applicable legislation may require Greif to make changes to our data protection rules from time to time. We reserve the right to implement appropriate changes and update our privacy notice accordingly at any time.

The following subsidiaries will also be covered entities under the Privacy Shield list of Greif, Inc.:

- Greif Packaging LLC
- Delta Petroleum Company, Inc.
- Greif Flexibles USA, Inc.
- American Flange & Manufacturing Co., Inc.
- Soterra LLC
- Containter Life Cycle Management LLC

Greif, Inc.  
425 Winter Road  
Delaware, Ohio 43015  
United States of America  
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