



# Website Privacy and Cookies Policy

This policy applies to (i) customers and suppliers of DS Smith Plc (the "Company", "we" or "us") with an address at 350 Euston Road, London, United Kingdom, NW1 3AX, or any of DS Smith Plc's group companies and (ii) users of the website [www.dssmith.com](http://www.dssmith.com) or such subdomain (collectively the "Site") which is run by DS Smith Plc or any of its group companies.

The Company recognises the importance of honest and responsible use of your personal information. This Privacy and Cookies Policy ("Policy") explains how the Company collects, uses and discloses personal information about you both in our day-to-day dealings with us and when you visit a DS Smith web site.

## What type of information does the Company collect on its customers and suppliers and why?

We collect information that is required to contact you as a customer or supplier of DS Smith in order to discuss and/or fulfil our contractual obligations to you.

## What type of personal information does the Company collect?

The following are the categories of personal information that we collect from you:

- your full name and title;
- your work contact details, such as address, telephone numbers and e-mail address;
- the reason for your contact, which may be a request or enquiry on your own behalf, a request or enquiry on behalf of someone else, a customer service need, providing a comment, or details in relation to a possible or existing order or service contract;
- if you create an online account - your username, password, e-mail address and your full name, address and telephone numbers;
- your contact and marketing preferences (subject to receiving your express where required by applicable law); and
- information necessary for legal compliance.

This information will be collected primarily from you as information voluntarily provided to us, but we may also collect it where lawful to do so from (and combine it with information from) public sources, third party service providers,



individuals whom you have indicated have agreed for you to provide their personal information, government, tax or law enforcement agencies, and other third parties. We may also collect personal information about you from your use of services provided by affiliates of the Company.

## **How does the Company use information about you?**

The Company may use information about you for purposes described in this Policy or disclosed to you on the Site or with our services. For example, we may use information about you for the following purposes:

- to respond and/or deal with your request or enquiry;
- for internal record-keeping;
- to contact you (directly, either by the Company or any of its affiliates, or through a partner or agent) by e-mail or phone for the above reasons;
- subject to your consent where required under applicable laws, to carry out direct marketing and/or e-mail marketing that you have requested;
- where necessary as part of any restructuring of the Company, or sale of any business or assets of the Group;
- to perform any contract the Group has with you; and
- for compliance with legal, regulatory and other governance obligations.

Some of the personal information that the Company maintains will be kept in paper files, while other personal information will be included in computerised files and electronic databases as set out in more detail below.

In most cases, the information the Company processes about you is required to deal with your request, required by law, required in order to fulfil a contractual obligation or is necessary for the exercise of the Company's legitimate business interests and needs, in which case, special care is taken to safeguard your rights and to ensure any such use is proportionate.

## **What is the legal basis for the use of personal data?**

The legal basis on which we rely to process your personal information include:

- On some occasions, we process your data with your consent (for example, when you agree that we may place cookies or process information that you input into our Site).



- On other occasions, we process your data when we need to do this to fulfil a contract with you (for example, for billing purposes) or where we are required to do this by law (for example, to comply with governmental record-keeping obligations).
- We also process your data when it is in our legitimate interests to do so and when these interests are not overridden by your data protection rights (including, for example, when we share data with our affiliates).

## **Does the Company share personal information with third parties?**

Your personal information will be made available for the purposes mentioned above (or as otherwise notified to you from time to time), on a 'need-to-know' basis and only to management, sales/customer service teams, legal, logistics, audit, compliance, information technology and other corporate staff who properly need to know these details for their functions within the Group. Certain individuals who will see your personal information may not be based at the Company or in your country (please see below).

We may share personal information within the Group as needed for reasonable management, analysis, planning and decision making.

Your personal information may also be made available to third parties (within or outside the Group) providing relevant services under contract to the Group (see below for further details), such as auditors and compliance managers, providers or call centres and IT hosting and IT maintenance providers. These third parties may use information about you to perform their functions on our behalf. The Company has put in place various security and data privacy measures, including with such third parties, in order to protect personal information and shall seek to comply with applicable legal requirements.

We may disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities, where required or permitted by law, and for tax or other purposes. Personal information may also be released to third parties in response to legal process, and when required to comply with laws, or to enforce our agreements, corporate policies, and terms of use, or to protect the rights, property or safety of the Group, our employees, agents, customers, and others, as well as to parties to whom you authorise the Company to release your personal information.



We will not sell your personal information to any third party other than as part of any restructuring of the Group or sale of any business or assets of the Group.

## **Will your personal information be transferred abroad?**

Some transfers of personal information have been explained above. Individuals within the European Economic Area (“EEA”) should be aware that recipients of their personal information, within the Group or third parties (as set out in this notice), may not be located within the EEA but instead located in countries which do not have equivalent protection for personal information to that within the EEA. Steps will be taken to protect your personal information in that instance consistent with applicable law. For example data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request to [corporate@dssmith.com](mailto:corporate@dssmith.com).

## **What choices does the Company offer you with regard to direct marketing?**

The Company may wish to provide you with information about new products, services, promotions and offers, which may be of interest to you and may invite you to take part in market research or request feedback on the Group's products and services. This communication may occur by e-mail, telephone, post or SMS. We will obtain your consent and advise you of how to opt-out of receiving such communications where we are required to do so in accordance with applicable law.

## **The Site and cookies**

Below we set out how the Company collects, uses and discloses personal information about you both when you visit the Site. The information you provide to us through the Site will initially be collected by the Company, but may then be shared with affiliates of the Company (the Company, together with its Affiliates, the “Group”).

It is important to us that you feel comfortable in visiting the Site.

## **What personal information do we collect via the Site?**



We may collect website use information. Our collection of this information may involve the use of cookies and Web beacons. Please see the “Use of cookies” section below for more information.

We may collect personal information on the Site for the following purposes:

- to improve our products and services and to ensure that content from the Site is presented in the most effective manner for you and for your computer (or other electronic Internet-enabled device); and
- to administer the Site.

If you use the Site’s search feature, queries and results are logged anonymously without any user-specific details being collected. The Company or one of its affiliates may also convert personal information into anonymous data and use it (normally on an aggregated statistical basis) for research and analysis to improve the performance of the Site or the services provided by the Group.

If you want to contact us or to use certain features that we provide on the Site, you will need to provide us with some additional personal information so that we can liaise with you and deal with your request or query. If you choose to provide us with your personal information, we will collect that information for our own use and for the purposes described in this Policy.

Please note that some personal information is only collected via the Site if you choose to provide such information to us (such as your full name and title), while some of this information is collected automatically (such as standard internet and website log information). The following are the categories of personal information that we collect from you via the Site:

- standard internet and website log information and details of patterns about how website visitors behave on the Site. The information we may collect includes information about your Internet service provider, your operating system, browser type, domain name, the Internet protocol (IP) address of your computer (or other electronic Internet-enabled device), your access times, the website that referred you to us, the Web pages you request and the date and time of those requests.
- where you “like” us or make posts on our pages on social networking websites
- information necessary for legal compliance;

Where you choose to provide it, we will also collect the following information via the Site:



- your full name and title;
- your work contact details, such as address, telephone numbers and e-mail address;
- the reason for your contact, which may be a request or enquiry on your own behalf, a request or enquiry on behalf of someone else, a customer service need, providing a comment, or details in relation to a possible or existing order or service contract;
- if you create an online account - your username, password, e-mail address and your full name, address and telephone numbers;
- financial account information (where relevant and required), such as credit card number and other payment information; and
- your contact and marketing preferences.

While we take these reasonable efforts to safeguard your personal information, we cannot guarantee the security of any personal information you disclose online. You accept the inherent security implications of dealing online and will not hold us responsible for any breach of security unless such breach has been caused by the specific negligence of the Group or their agents.

## **Use of cookies**

We use cookies for certain areas of the Site. Cookies are small data files stored on your hard drive by a website. Cookies help us improve the Site and your experience. We use cookies to see which areas and features are popular and to count visits to our websites, to recognise you as a returning visitor and to tailor your experience of the Site according to your preferences. Overall, cookies help us provide you with better websites, by enabling us to monitor which pages you find useful and which you do not. We may also use cookies for targeting or advertising purposes. We may use Web beacons on the Site or in our e-mails. Web beacons are electronic images that may be used to deliver cookies, count visits, understand usage of Group websites and to tell if an e-mail has been opened and acted upon. Further details about cookie purposes and types are below. To delete or block cookies by browser settings at any time and for more general information about cookies including the difference between session and persistent cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

We also use Google Analytics on our Site to collect information about your online activity on the Site, such as the Web pages you visit, the links you click, and the searches you conduct on the Site. We use the information to compile reports and to help us improve the Site. The cookies collect information in an anonymous form, including the number of visitors to the Site, where visitors

have come to the Site from and the pages they visited. For more information about the information gathered using Google Analytics please visit <http://www.google.com/intl/en/analytics/privacyoverview.html>. You can prevent these cookies by selecting the appropriate settings on your browser. If you do this you may not be able to use the full functionality of this Site. You may download and install the Google Analytics Opt-out Browser Add-on available here: <http://tools.google.com/dlpage/gaoptout>.

The cookies used on our Site are categorised in accordance with the International Chamber of Commerce United Kingdom Cookie Guide as follows:

- Cookies which are “**strictly necessary**” for functionality of the Site’s platforms. These cookies are essential in order to enable users to move around the Site and use its features.
- “**Performance**” cookies which collect information about how users navigate the Site, for example, which pages users access most frequently. They identify how users interact with the Site, any errors that occur, which pages are not used often, which pages take a long time to load, which pages users tend to visit and in what order. These cookies do not collect any information which could identify you and are only used to help us improve how our Site works and understand what interests the Site’s users.
- “**Functionality**” cookies which allow the Site to remember choices you make and your preferences as a logged in user (for example, based on your user name).
- “**Targeting or advertising**” cookies used to deliver advertising material relevant to an identified machine or other device (not a named or otherwise identifiable person) which are tailored to interests associated with the website activity tied to that machine or device. For example, if a cookie on a third party website recognises that a particular product was purchased from a particular device, that cookie may “talk to” marketing cookies on the Site to ensure advertisements about similar products displayed on the Site are accessed from that device. These cookies are also used to limit the number of times a user sees an advertisement as well as to help measure the effectiveness of an advertising campaign. They may also remember that the Site has been visited from a device and share that information with marketing organisations. The marketing cookies on the Site are operated by third parties with our permission. Marketing cookies are used to monitor from which advertising source a user was directed towards the Site so that we know whether it is worth us investing in that particular advertising source.

<b>Cookie name/type</b>	<b>Expiration Period</b>	<b>Purpose</b>	<b>Category of cookie as defined in the ICC Cookie Guide</b>
SESSxxxID	Session  (these cookies typically expire at the end of your session or at the latest within one week)	Authentication session to prevent having to login multiple times in one browser session. A unique ID that ties the current session to a database settings table.	Strictly necessary/Functionality
has_js	Session  (these cookies typically expire at the end of your session, in other words, when you close your browser)	This helps the website understand your Web browser's Javascript functionality. An on/off flag that denotes whether or not the browser supports Javascript.	Strictly necessary/Functionality
cookie-agreed-en	4 months from set/update	Enables us to remember if you accept cookies from this website. An on/off flag that denotes whether or not you accept cookies.	Strictly necessary/Functionality
Google Analytics utma	2 years from set/update	Provides a unique ID for each Web browser that visits this site.	Targeting/advertising

Google Analytics utmb	Session 30 minutes from set/update	Used to establish and continue a user session with this website.	Targeting/advertising
Google Analytics utmc	Session (these cookies typically expire at the end of your session, in other words, when you close your browser)	Used to establish and continue a user session with this website.	Targeting/advertising
Google Analytics utmz	6 months from set/update	Used to calculate search engine traffic, ad campaigns and page navigation within this site.	Targeting/advertising

## Cookie settings

We will ask for your consent to the use of cookies set out in this Policy when you first access the Site and if we introduce any new cookies to the Site. When you first visit the Site, a box/banner will appear asking you to agree to the cookies that we set on the Site. Your continued use of the Site will be treated as consent to the use of these cookies for the purposes described.

**If you reject cookies** we will not set any further cookies on your device, except that we will set the "Strictly necessary" cookies detailed above, including a cookie to remember that you don't want any cookies set when you visit the Site.

You can usually choose to set your browser to warn you when a cookie is being set or to remove or reject cookies. Each browser is different, so review your browser's Help menu to learn the correct way to modify your cookie settings. If you choose to remove or reject cookies, it will affect many features or services on the Site.

**If you agree to cookies** on the Site by clicking on the "I agree" button, we will set cookies on your device. If you wish to delete the cookies we have set on your device, please refer to your browser Help menu.



**If you do nothing** to indicate your cookie preference for the Site we will treat this as acceptance and set cookies on your device. To modify your cookie settings, please refer to the Help menu of your browser.

## **Changes to this Policy**

We keep this Policy under regular review. We may change this Policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. The date at the top of this Policy will be updated accordingly.

We encourage you to check the date of this Policy when you visit the Site for any updates or changes. We will notify you of any modified versions of this Policy that might materially affect the way we use or disclose your personal information.

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## **What safeguards are in place to protect your personal information?**

The Company takes reasonable steps to employ appropriate physical, technical and administrative security measures to help prevent loss, misuse, unauthorised access, disclosure or modification of your personal information.

## **What rights do you have to review and amend personal information?**

You have the right to review and access your personal information held by the Company.

You also have the right to ask us to rectify, block, complete and delete your personal information, to restrict its use, and to 'port' your personal information



(that is, to ask us to provide it to you in a structured, commonly used and machine readable format and to transmit it directly to another organisation).

In addition, you have the right to request further information about the handling of your personal information.

If you wish to do so, or to notify the Company of a change in your details, please contact [corporate@dssmith.com](mailto:corporate@dssmith.com).

There are exceptions to these rights, however. For example, access to personal information may be denied in some circumstances if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information. In addition, we may be able to retain data even if you withdraw your consent, where we can demonstrate that we have a legal requirement to process your data.

If you have a question about the use of your personal information, or wish to file a complaint about it, please contact us, using the contact details set out above.

Finally, if you have unresolved concerns, you also have the right to complain to data protection authorities.

## **Storage of information**

When we store your information, we do so for as long as necessary to (i) fulfill the specific purposes for which your personal information was collected, (ii) to perform the services set out in this notice, or (iii) to comply with our legal obligations or enforce our legal rights.

## **Contact/address details**

If you have any questions about this Privacy Policy, please contact us at:

Legal Team  
DS Smith Plc  
350 Euston Road  
Regent's Place  
London  
NW1 3AX

[corporate@dssmith.com](mailto:corporate@dssmith.com)