

**Graphic Packaging Holding Company (“GPHC”, “we”, “us”, “ours”)
California Applicant Privacy Notice**

PURPOSE OF THIS NOTICE: This California Applicant Privacy Notice (the “**Applicant Notice**”) describes the GPHC’s collection and use of certain personal information relating to external job applicants and candidates for positions with us (“**Applicants**”). For California residents, this Applicant Notice describes our collection and use of certain personal information about Applicants and is intended to satisfy our applicable notice requirements under the California Consumer Privacy Act (“**CCPA**”). We may provide Applicants additional notices about our data collection practices that are covered by other laws (e.g., if we conduct a background check or extend an employment offer).

SCOPE OF THIS NOTICE: This Applicant Notice applies to the personal information that we collect from and about Applicants, in the context of reviewing, assessing, considering, managing, storing or processing their applications or otherwise considering them for a position with us.

What is personal information? In this Applicant Notice, “**personal information**” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

What isn’t covered by this notice? This Applicant Notice does not address or apply to our collection of personal information that is not subject to the CCPA, such as consumer credit reports and background checks, publicly available data lawfully made available from state or federal government records, or other information that is exempt under the CCPA. This Applicant Notice also does not apply to the personal information we collect from employees (which is subject to a separate privacy notice), or to the personal information that we collect from customers or end users of our products and services, including Applicants, in the context of their personal use of products and services (which is subject to our Privacy Policy).

Are our practices the same for all Applicants? The categories of personal information we collect and our use of personal information may vary depending on the position(s) or location, as well as the associated qualifications and responsibilities. The information in this Applicant Notice is intended to provide an overall description of our collection and use of personal information about Applicants.

CATEGORIES OF PERSONAL INFORMATION COLLECTED: Generally, we may collect the following categories of personal information about Applicants, where appropriate and to the extent permitted under applicable law:

Name, Contact Info and other Identifiers. Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, and other government identifiers.
Protected Classifications. Such as race/ethnicity, sex, veteran status, disability, and other characteristics of protected classifications under California or federal law. Note: Generally, this information is only collected on a voluntary basis, after an offer of employment has been extended, and is used in support of our equal opportunity and diversity and inclusion efforts and reporting obligations or where otherwise required by law.
Usage Data. Internet or other electronic network activity information, including, but not limited to, browsing history, search history and information regarding an Applicant’s interaction with an internet website or application.
Audio, Video and other Electronic Data. Audio, electronic, visual, thermal, olfactory or similar information such as CCTV footage, photographs, and call recordings and other audio recordings.
Employment History. Professional or employment-related information.
Education Information. Information about education history or background that is not publicly available personally identifiable information as defined in the Federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).

Profiles and Inferences. Inferences drawn from any of the information identified above to create a profile about an Applicant reflecting the Applicant’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

PURPOSES FOR COLLECTING AND USING PERSONAL INFORMATION: Generally, we may use the above categories of personal information for the following purposes:

Recruiting, Hiring, Managing and Evaluating Applicants. To review, assess, recruit, consider or otherwise manage Applicants and job applications, including:

- Scheduling and conducting interviews
- Identifying Applicants, including by working with external recruiters
- Reviewing, assessing and verifying information provided, to conduct criminal and background checks (where relevant and pursuant to applicable law), and to otherwise screen or evaluate Applicants’ qualifications, suitability and relevant characteristics
- Extending offers, negotiating the terms of offers and assessing salary and compensation matters
- Satisfying legal and regulatory obligations
- Communicating with Applicants regarding their applications and about other similar position(s) for which they may be interested
- Maintaining Applicant personal information for future consideration
- Supporting our equal opportunity employment policy and practices

Security and Monitoring. To monitor and secure our resources, network, premises and assets, including:

- Monitoring for, preventing, investigating and responding to security and privacy incidents
- Providing and managing access to physical and technical access controls
- Monitoring activities, access and use to ensure the security and functioning of our systems and assets
- Securing our offices, premises and physical assets, including through the use of electronic access systems and video monitoring

Auditing, Accounting and Corporate Governance. For purposes relating to financial, tax and accounting audits, and audits and assessments of our business operations, security controls, financial controls or compliance with legal obligations, and for other internal business purposes such as administration of our records retention program.

M&A and Other Business Transactions. For purposes of planning, due diligence and implementation of commercial transactions (e.g., mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization or other similar business transactions).

Defending and Protecting Rights. To protect and defend our rights and interests and those of third parties, including to manage and respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.

Compliance with Applicable Legal Obligations. For purposes relating to compliance with applicable legal obligations (such as hiring eligibility, responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations, including under employment and labor laws and regulations, social security and tax laws, environmental regulations, workplace safety laws and regulations and other applicable laws, regulations, opinions and guidance.

CONTACTING US ABOUT THIS NOTICE: If you have any questions or comments about this notice, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please email us at California-Privacy@graphicpkg.com or call our toll free Alertline at 1-866-898-3750. If you would like to report a violation of this policy, you may also call our toll free Alertline at 1-866-898-3750 or file a report online at gpibusinessconductALERTline.ethicspoint.com.