



Effective date: 04.01.2021

WAVEGRIP PRIVACY NOTICE

FOR CUSTOMERS AND BUSINESS PARTNERS AND CONTACTS

OUR COMMITMENT TO PROTECT YOUR PRIVACY

At WaveGrip, we take privacy seriously. We are committed to the protection of personal data in line with the data protection principles set out in the European General Data Protection Regulation effective on 25 May 2018 (including as applied from time to time in the United Kingdom) (“**GDPR**”).

This Notice describes the steps WaveGrip (“**we**” or “**us**”) takes to protect the personal data that we process about our UK and EU customers and other EU and UK business partners and contacts.

1 WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA AND HOW TO CONTACT US

If you are a user of this website (www.wave-grip.com) the data controller is: British Polythene Limited, a company incorporated in England and Wales with company number 00350729 with its registered office at Sapphire House, Crown Way, Rushden, Northamptonshire, England, NN10 6FB, United Kingdom, and can be contacted at the following email address: hello@wave-grip.com

British Polythene Limited is a member of the group of companies directly, or indirectly, held and/ or controlled by Berry Global Group, Inc. (NYSE:BERY), a company with its principal place of business at 101 Oakley Street, Evansville, IN 47710, USA (together “**Berry Global Group**” or “**Berry**”). In this notice references to “**Berry European affiliate**” means any of the EU or UK based operational companies that are affiliates of the Berry Global Group.

If you are an individual associated with one of our current or prospective customers or suppliers, the relevant data controller is the Berry European affiliate with which the company you are associated with has a contract or business relationship.

In this notice “**European Economic Area**” or “**EEA**” means the Member States of the European Union, plus Norway, Iceland and Lichtenstein.

2 WHAT PERSONAL DATA DO WE COLLECT AND WHY?

We may source, use and otherwise process your personal data in different ways. In all cases we are committed to protecting the personal data of our business contacts.

In each of the sections listed below, we describe how we obtain your personal data and how we will treat it.

Section 2.1	Representatives of our Existing or Prospective Customers and Suppliers
Section 2.2	Visitors to Premises



2.1 REPRESENTATIVES OF OUR EXISTING OR PROSPECTIVE CUSTOMERS AND SUPPLIERS

A - Sources of personal data

We may obtain your personal data from the following sources:

- a) from you directly;
- b) from a company or other organisation that employs you, if you are an employee of one of our customers, prospects or suppliers;
- c) from other entities within the Berry Global Group;
- d) during networking events that we have either hosted, or sponsored, or attended; and/or
- e) from publicly available sources (for example, your company/organisation website or professional social media and websites).

B - Personal data that we collect and process

We may collect the following categories of personal data relating to our corporate customers' and/or suppliers' employees, officers, authorised signatories, and other associated individuals:

- a) name (including title);
- b) gender;
- c) business address;
- d) business email address;
- e) business telephone number;
- f) fax number;
- g) employer name, organisation type and associated industry;
- h) support offered to, or sought from, WaveGrip; and
- i) job title and department.

C - Why do we collect your personal data and what is our lawful basis for it?

Representatives of our Existing or Prospective Customers and Suppliers		
<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Provide you/ your organisation with our products or services or receive products or services from you/ your organisation	Legitimate Interest	Efficiently fulfil our contractual and legal obligations Management reporting (including at an intra-group level)



Establish and manage our business relationship		Efficiently fulfill our contractual and legal obligations
Learn about how our/ your products and services are or may be used		Account management Exercise or defend legal claims Understand the market in which we/ you operate Management reporting (including at an intra-group level)
Maintain security		Understand the market in which we/you operate Management reporting (including at an intra-group level)
Let you know about our products, services and events that may be of interest to you/ your organisation by letter, telephone, email or other forms of electronic communication		Managing security, risk and crime prevention Management reporting (including at an intra-group level) Promote our goods and services Management reporting (including at an intra-group level)

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

2.2 VISITORS TO OUR PREMISES

A - Sources of personal data

We may obtain your personal data from you directly and from our systems' records.

B - Personal data that we collect and process

- a) name;
- b) business contact details;
- c) organisation;
- d) role;
- e) time in and time out; and possibly
- f) image (for example, from CCTV cameras at our premises, where there are any).



C - Why do we collect your personal data and what is our lawful basis for it?

Visitors to our Premises		
<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Maintain security	Legitimate Interest	Managing security, risk and crime prevention

2.3 WEBSITE VISITORS

A - Sources of personal data

We may obtain your personal data from the following sources:

- a) from you directly (for example, at the time of subscribing to any services offered on our website(s), including but not limited to email mailing lists, interactive services, posting material or requesting further goods or services)
- b) from your device or browser; and/or
- c) if you contact us, we may keep a record of that correspondence.

B - Personal data that we collect and process

- a) name;
- b) email address;
- c) company;
- d) address;
- e) phone number;
- f) cookie data (for more information please see our Cookies Policy by clicking here ([enable link](#)))
- g) IP address.

C - Why do we collect your personal data and what is our lawful basis for it?

Website Visitors		
<i>We may use your personal data to:</i>	<i>Our lawful basis for doing so is:</i>	<i>Our legitimate interests in doing so are:</i>
Provide our website services to you	Legitimate Interest	Website management Promote our goods and services



		Account management
Establish and manage our business relationship		Understand the market in which we operate Management reporting (including at an intra-group level) Account management
Learn about our websites(s) users' browsing patterns and the performance of our website(s)		Website management
Maintain security		Managing security, risk and crime prevention Management reporting (including at an intra-group level)
Let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication		Promote our goods and services Management reporting (including at an intra-group level)
Learn about how our products or services may be used		Understand the market in which we operate Management reporting (including at an intra-group level)

Where we use cookies or similar technologies to fulfill this purpose we will seek your prior consent where required to do so by law. For further details of our Cookies Policy click here [\(insert link\)](#)

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

NB: The above section 2.3 applies to this website. You should check the specific notice that may be placed on any of the other Berry websites that you visit for the terms that apply to other sites.



This website may include links to third-party websites, plug-ins and applications. Clicking on, or enabling, these links or connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

3 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We share personal data relating to our customers and business contacts among our European and global offices, and also with trusted third party suppliers and business partners. The purposes for these transfers are set out below. We do not sell your personal data to third parties.

Berry European and other affiliates

We may share your personal data with other entities in the Berry Global Group.

Our Service Providers

We may disclose information about you to organisations that provide a service to us, on the understanding that they will keep the information confidential and will comply with the GDPR and other relevant data protection laws.

We may share your information with the following types of service providers:

- a) technical support providers who assist with our website and IT infrastructure;
- b) third party software providers, including 'software as a service' solution providers, where the provider hosts the relevant personal data on our behalf;
- c) professional advisers such as lawyers, accountants, tax advisors, auditors and insurance brokers;
- d) providers that help us generate and collate reviews in relation to our goods and services;
- e) our advertising and promotional agencies and consultants and those organisations selected by us to carry out marketing campaigns on our behalf; and/or
- f) providers that help us store, collate and organise information effectively and securely, both electronically and in hard copy format, and for marketing purposes.

Company Mergers and Takeovers

We may transfer your personal data to potential purchasers and their advisors, subject to appropriate confidentiality obligations, in the event we decide to dispose of all or parts of our business.

4 TRANSFERS OF PERSONAL DATA OUTSIDE THE UK OR EUROPEAN UNION (EU) /EUROPEAN ECONOMIC AREA (EEA)

If and when transferring your personal data outside the UK or EU/EEA, we will do so using one of the following safeguards:

- a) the transfer is to a non-EU/EEA country which has an adequacy decision by the EU Commission;
- b) the transfer is covered by a contractual agreement, which covers the GDPR requirements relating to transfers to countries outside the UK or EU/EEA (as applicable);



- c) the transfer is to an organisation which has Binding Corporate Rules approved by a European data protection authority; or
- d) the transfer is to an organisation in the US that is EU-US Privacy Shield certified.

International transfers within the Berry Global Group are governed by EU Commission-approved Standard Contractual Clauses for Controllers (as defined under the GDPR) and, where relevant, for Processors (as defined under the GDPR).

We may also transfer your data to third-party suppliers outside the UK or EU/ EEA, such as our customer relationship management systems providers. Where we do so, the Standard Contractual Clauses or other safeguards approved by the European Commission will be put in place to safeguard that personal data.

You may request further information by emailing us at hello@wave-grip.com

5 YOUR RIGHTS

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- **Request access to personal data about you** (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- **Request rectification, correction, or updating to any of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request personal data provided by you to be transferred in machine-readable format (“data portability”).** to the extent applicable in the business relationship context. This enables you to ask us to provide you, in a machine-readable format, personal data that you have provided to us for transfer to another data controller.
- **Request erasure of personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- **Request the restriction of processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- **Object to the processing of your personal data in certain circumstances.** This right may apply where the processing of your personal data is based on the legitimate interests of the controller, as explained above, or where decisions about you are based solely on automated processing, including profiling, and you have grounds for objection relating to your particular situation.
- **Withdraw your consent.** You may withdraw your consent in those circumstances where we may rely on your consent to process your personal data.

These rights are not absolute and are subject to various conditions under:

- applicable data protection and privacy legislation; and
- the laws and regulations to which we are subject.

If you have any general queries or decide at any time that you would like to exercise any of your rights as set out above, please email: hello@wave-grip.com, or call +44 (0) 01294 842150. You also have the right to lodge a complaint with your local Data Protection Authority



if you are not happy with how WaveGrip processes your personal data and/or we could not provide you with a satisfactory resolution to your request. In the UK, the Data Protection Authority is the Information Commissioner's Office at Water Lane, Wycliffe House Wilmslow, Cheshire SK9 5AF, United Kingdom. Tel. +44 1625 545 745. Website: <https://ico.org.uk>.

6 RETENTION PERIOD

We will keep and process your personal data only for as long as is necessary for the purposes for which it was collected in connection with your relationship with us, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defence of legal claims.

7 CHANGES

We may make changes to this Notice from time to time to reflect changes in the law or in our practices. Such changes will be applicable as of the effective date set out in this Notice.