

PRIVACY POLICY

IP Belgian Services Company SPRL is concerned about privacy issues and wants you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect through websites operated by us from which you are accessing this Privacy Policy (the “**Sites**”).

By providing Personal Information to us, you agree to the terms and conditions of this Privacy Policy.

PERSONAL INFORMATION

Personal Information We May Collect

“**Personal Information**” is information that identifies you as an individual, including:

- Name and title
- Business address (including billing and shipping addresses)
- Business contact details
- Other information entered on the forms available on the Sites

If you submit any Personal Information relating to other individuals to us or to our service providers, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

How We May Collect Personal Information

We and our service providers may collect Personal Information in a variety of ways, including:

- **Through the Website:** We may collect Personal Information through the Sites, e.g., when you sign up for a newsletter or otherwise contact us.
- **Offline:** We may collect Personal Information from you offline, such as when you visit our company, attend one of our events, place an order over the phone or contact our customer service.
- **From Other Sources:** We may receive your Personal Information from other sources, such as public databases; joint marketing partners; as well as from other third parties.

How We May Use Personal Information

We may use Personal Information:

- To respond to your inquiries and fulfill your requests, such as to send you newsletters.
- To send administrative information to you, for example, information regarding the services we provide and changes to our terms, conditions, and policies.
- To send you marketing communications that we believe may be of interest to you.
- To personalize your experience on the Sites by presenting products and offers tailored to you.
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, enhancing, improving or modifying our services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you

or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

How Personal Information May Be Disclosed

Your Personal Information may be disclosed:

- To our affiliates, for the purposes described in this Privacy Policy. IP Belgian Services Company SPRL is the party responsible for the management of the jointly-used Personal Information. For a current list of relevant IP entities, please contact emea.compliance@ipaper.com.
- To our third party service providers who provide services to us, such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing and other similar services.
- To third parties to permit them to send you marketing communications, if you have opted in to such sharing.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

THIRD PARTIES INFORMATION

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Sites link. The inclusion of a link on the Sites does not imply endorsement of the linked site or service by us or by our affiliates.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the "Contacting Us" section below.

How you can access, change or suppress your Personal Information

If you would like to review, correct, update, suppress, or delete Personal Information that has been previously provided to us by you, please contact us by email at kyrill.farbmenn@ipaper.com, or please write to the following address: EMEA Ethics and Compliance Office, Chaussée de la Hulpe 166, 1170 Brussels, Belgium.

RETENTION PERIOD

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

USE OF WEBSITE BY MINORS

The Sites are not directed at individuals under the age of 13 (in accordance with applicable laws), and we request that such individuals do not provide Personal Information through the Sites.

CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Sites you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those of your country.

SENSITIVE INFORMATION

We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or through the Sites or otherwise to us.

UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy. Please take a look at the “*LAST UPDATED*” legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Sites. Your use of the Sites following these changes means that you accept the revised Privacy Policy.

CONTACTING US

If you have any questions about this Privacy Policy, please contact us by email at emea.compliance@ipaper.com, or please write to the following address: EMEA Ethics and Compliance Office, Chaussée de la Hulpe 166, 1170 Brussels, Belgium.