

Biometric Information Security Policy

Purpose

This Policy defines the Company's policy and procedures for collection, use, safeguarding, storage, retention, and destruction of biometric data that it collects.

Scope

This Policy applies to individuals, including, but not limited to, employees, independent contractors, temporary workers, and visitors, from whom Graphic Packaging collects biometric data.

Policy

Definition of Biometric Data

"Biometric data" means personal information stored by Graphic Packaging about an individual's physical characteristics that can be used to identify that person. Biometric data specifically includes fingerprints, voiceprints, retina or iris scan, and the scan of hand or face geometry.

Use of Biometric Data

Graphic Packaging uses biometric identification systems in some facilities to scan the geometry of employees' hands, fingers and/or fingerprints. The Company may also use cameras to capture images of employees' faces, though such images are not generally considered "biometric data." The Company collects and stores biometric data on its systems for the purpose of:

- Providing secure access to specific Company facilities or working areas; and
- Tracking employee time and attendance via biometric time clocks.

In addition to the above, The Company and/or vendors working on behalf of the Company and in furtherance of its wellness programs, may collect biometric health information from or conduct biometric screenings of employees to assess their health risks and provide incentives for changing behaviors that could lower their risks.

Protection of Biometric Data

Consent: An individual's biometric data will not be collected or otherwise obtained by Graphic Packaging without prior written consent of the individual. The Company will inform the individual of the reason for collecting the biometric information and the length of time the data will be stored.

Confidentiality: Biometric data is securely stored on a stand-alone server. The Company will store, transmit, and protect biometric data using the same standard of care and security controls it provides other confidential and sensitive personal information in its possession.

Graphic Packaging, its vendors, and the licensor of the Company's time and attendance software will not sell, lease, trade, or otherwise profit from an individual's biometric data. Likewise, the Company will not disclose biometric data to any third parties, other than its vendors and the licensor of the Company's biometric identification software, unless (i) consent is obtained from the employee, (ii) the disclosure is required by law, or (iii) the disclosure is required by valid legal subpoena.

Retention:

Graphic Packaging will destroy biometric data within a reasonable period of time of when the purpose for obtaining or collecting such data has been fulfilled or within three years of the employee's last interaction with the entity collecting the biometric data, whichever comes first.