

Ardagh Group Privacy Statement

Supplemental Notice for California Consumers

Dated 23 June 2020

Why?

The California Consumer Privacy Act of 2018 (CCPA) gives California residents the right to know what Personal Information Ardagh Group S.A. (“Ardagh,” “we,” “us,” or “our”) collects about them, including whether it is being sold or disclosed to third parties. The CCPA also grants certain rights to California residents, including the right to delete their Personal Information (subject to certain exceptions) and the right to prevent Ardagh Group from selling their Personal Information. Companies are also prohibited from retaliating or discriminating against consumers for exercising their rights under the CCPA. This Supplemental Notice provides the information required under the CCPA and applies to both Ardagh Group’s online and offline activities. For more information about how we collect, use, and share information through our websites and online services, please review our Privacy Statement.

Please note that our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those 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. When you leave our website, we encourage you to read the privacy notice of every website you visit.

What?

To learn about the categories of personal information we have collected In addition to the purposes for collecting and sharing Personal Information described below, Ardagh Group collects and discloses any and all Personal Information (regardless of your relationship or interaction with us) as necessary or appropriate to: comply with laws and regulations; monitor, investigate potential breaches of, and enforce compliance with Ardagh Group policies and procedures and legal and regulatory requirements; comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; and exercise or defend the legal rights of Ardagh Group and its employees, affiliates, customers, contractors, and agents.

We may have to share your personal information with internal third parties and external third parties for the purposes set out in the table below.

- **Internal Third Parties** include subsidiaries of Ardagh Group S.A. who provide (a) IT and system administration services, and (b) undertake reporting activities; and employees within the Sales/ Communications/ Marketing/ Investor Relations teams who have access to the personal information to carry out the purposes described below.
- **External Third Parties** include service providers who provide IT, email, website and system administration services; professional advisers including lawyers, finance providers, auditors and insurers who provide consultancy, financing, legal, insurance and accounting services; and regulators and other authorities who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Personal Information

In this Supplemental Notice, “Personal Information” (or “PI”) means any information that identifies, relates to, describes, or is capable of being associated with you or your household, whether directly or indirectly. It does not include data where the identity has been removed (anonymous data). We collect PI from you (whether because you submit that information to us or in the course of our interaction with you), from your device (as you interact with our website or other online resources), and from publicly available sources or third parties who have collected information about you. In the chart below, we use the following Categories of Personal Information to describe the Personal Information we collect, use, and share about consumers:

Commercial Information

Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

	<p>Financial Information Financial information, including bank account number, credit or debit card number, billing personnel, or other financial information.</p> <p>Identifiers Identifiers, such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, company name, job title or other similar identifiers.</p> <p>Inferences Inferences drawn from any of the information listed above to create a profile about an individual reflecting the individual’s preferences, including preferences in receiving marketing materials such as newsletters and/or investor relations subscriptions and communication preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. (e.g., predications about an individual’s preferences or tendencies).</p> <p>Geolocation Data An individual’s precise geolocation data.</p> <p>Network Activity Data Internet or other electronic network activity information, such as browser type and version, browser plug-in types and version, browsing history, search history, login data, operating system and platform and other technology on the devices you use to access a website, all information about your usage of data, including information about how you use our website, products and services, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p> <p>Professional Information An individual’s professional or employment-related information, including company name, job title, professional billing address, professional delivery address, professional email address and telephone numbers.</p>
<p>Your Rights</p>	<p>If you are a California resident, you may have the following rights under the CCPA with respect to your Personal Information:</p> <ul style="list-style-type: none"> • Right to Notice. Before or at the time we collect Personal Information from you, you have the right to receive notice of the Personal Information to be collected and the purposes for which we use it. This Supplemental Notice is intended to satisfy this requirement. <p>You also have the right to request that we disclose to you the categories of personal information we have collected about you in the preceding 12 months, along with the categories of sources from which the personal information was collected, the purpose for collecting or selling the personal information, the categories of third parties with whom we shared the personal information, and the categories of third parties to whom we sold the personal information.</p> <ul style="list-style-type: none"> • Right of Access. You have the right to request that we disclose or provide you with access to the specific pieces of Personal Information we have collected about you in the preceding 12 months. • Right to Deletion. You have the right to request that we delete the Personal Information we collect from you. However, in certain situations we are not required to delete your Personal Information, such as when the information is necessary in order to complete the transaction for which the Personal Information was collected, to provide a good or service requested by you, to comply with a legal obligation, to engage in research, to secure our websites or other online services, or to otherwise use your Personal Information internally in a lawful manner that is compatible with the context in which you provided the information. • Right to Opt-Out of the Sale of Personal Information. If Ardagh Group sells your Personal Information to third parties, you have the right, at any time, to direct us not to sell your personal information. To exercise this right, please click on the “Do Not Sell My Personal Information” button below or on any Ardagh Group webpage where the button is present. Ardagh Group does not sell the Personal Information of minors under 16 years of age without affirmative authorization. • Right Not to Be Subject to Discrimination. You have the right to be free from discrimination or retaliation for exercising any of your rights under the CCPA as described above. <p>You can exercise your rights by sending an email to privacy@ardaghgroup.com.</p>

	<p>NOTICE FOR OUR BUSINESS CUSTOMERS: Because we do not provide services directly to individuals, and instead provide goods and services exclusively on a business-to-business basis, once you enter into a business relationship with us, your rights under the CCPA will change. This notice is not intended to and does not describe our practices or your rights with regard to the information we collect in the course of our relationship with our business customers. For more information, please contact us using the phone number or email provided below.</p> <p>VERIFICATION: We value the security and confidentiality of your Personal Information. Therefore, if you exercise your right to notice, right of access, or right to deletion, we must first verify your identify to make sure that you are the person about whom we have collected Personal Information. We verify every request carefully.</p> <ul style="list-style-type: none"> • <p>You may also authorize someone else to submit these requests on your behalf. To do so, you may designate directly with us another person who may act on your behalf, or ask the authorized agent to provide us with a copy of your written permission and a scanned copy of their own government-issued ID.</p>
Financial Incentives	You have the right to be free from discrimination or retaliation for exercising any of rights under the CCPA. We may, however, charge a different price or rate, or provide a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to Ardagh Group by your Personal Information. Further, we may offer you financial incentives in return for your Personal Information. If we offer such a program, we will describe it to you further at the time of offering.
Contact Us	Call us at 833-737-0006 toll free or email us at privacy@ardaghgroup.com to contact us with questions regarding this Supplemental Notice. California residents who are unable to review or access this Supplemental Notice due to a disability may request information contained in the Supplemental Notice in an alternative format.

Prospective Customers and Website Visitors

Categories of PI Collected	Third Parties to Whom We Disclose PI
Identifiers	<ul style="list-style-type: none"> - internal third parties, as set out above - external third parties, as set out above - third parties to whom we may choose to sell, transfer, or merge parts of our business or assets
Financial Information	
Commercial Information	
Network Activity Data	
Geolocation Data	
Professional Information	
Inferences	

We collect your information for the following purposes:

- to register you as a new business partner
- to manage our relationship with you, which will include: notifying you about changes to our terms or privacy policy, asking you to leave a review or take a survey

- to administer and protect our business and this website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data
- to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you
- for marketing purposes, to form a view on what we think you may want, need or be interested in, and to make suggestions and recommendations based on those views
- auditing related to current interactions with you including counting ad impressions and unique visitors to our website
- to detect security incidents and other fraudulent activity
- to monitor and improve our website functionality
- to help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business
- to comply with a legal or regulatory obligation