



## Packaging Corporation of America Privacy Statement – California

This PRIVACY STATEMENT FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of Packaging Corporation of America and its subsidiaries and affiliates (collectively, “we,” “us,” “our” or “PCA”) and applies solely to natural persons who are residents of the State of California (“Consumers” or “you”). This notice is adopted by PCA in response to the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this notice.

### CATEGORIES OF PERSONAL INFORMATION PCA COLLECTS

PCA collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Personal Information”). Specifically, PCA has collected the following categories of Personal Information from Consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers	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, passport number, or other similar identifiers	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information	YES

C. Protected classification characteristics under federal or California law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	YES
E. Biometric information	Genetic, physiological, behavioral, biological characteristics, activity patterns, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings that can be used to establish individual identity	YES
F. Internet or other electronic network activity information	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	YES
G. Geolocation data	Physical location or movements	YES
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	YES
I. Professional or employment-related information	Current or past job history or performance evaluations	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf	YES
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	YES

PCA obtains the categories of Personal Information listed in the table above from the following categories of sources:

- Directly from PCA's employees and customers, contractors, or vendors, including their employees and/or agents.
- Indirectly from PCA's employees and customers, contractors, or vendors, including their employees and/or agents.
- Directly and indirectly from activity on PCA's website ([www.packagingcorp.com](http://www.packagingcorp.com)).
- From third-parties that interact with PCA in connection with PCA's operations and business conduct.

## **USE OF PERSONAL INFORMATION**

PCA may use or disclose the Personal Information PCA collects for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.
- To provide PCA customers or other individuals with information, products or services.
- To detect security incidents and to protect against malicious, deceptive, fraudulent, or illegal activity and prosecuting those responsible for such activity. .
- To provide individuals with email alerts, event registrations and other notices concerning PCA products or services, or events or news.
- To carry out PCA's obligations and enforce PCA's rights arising from any contracts entered into between PCA and its customers, vendors or contractors, including for billing and collections.
- To perform services, or provide products, to PCA's customers, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, or providing financing, marketing purposes.
- To undertake internal research for technological development and demonstration.
- To verify or maintain the quality or safety of a service or product that is owned, manufactured, manufactured for, or controlled by PCA, and to improve, upgrade, or enhance the service or product that is owned, manufactured, manufactured for, or controlled by PCA.
- To improve PCA's websites and present its contents to visitors of PCA's websites.
- For product development, research, analysis or product testing.
- As necessary or appropriate to protect the rights, property or safety of PCA, PCA's customers or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of PCA's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by PCA is among the assets transferred.

## SHARING PERSONAL INFORMATION

PCA may disclose Personal Information to a third party for a business purpose.

In the preceding twelve (12) months, PCA has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers
- Category B: Personal Information as listed in California Customer Record Statute
- Category C: Protected Classifications Characteristics
- Category D: Commercial Information
- Category E: Biometric Information
- Category F: Internet or Other Electronic Network Activity Information
- Category G: Geolocation Data
- Category H: Sensory Data
- Category I: Professional or Employment-Related Information
- Category J: Non-Public Education Information
- Category K: Inferences Drawn from Other Personal Information

PCA discloses Personal Information for a business purpose to the following categories of third parties:

- PCA affiliates and subsidiaries
- Third party vendors and contractors
- Service providers
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you
- Other third parties

In the preceding twelve (12) months, we have not sold any personal information.

## YOUR RIGHTS AND CHOICES

The CCPA provides Consumers with specific rights regarding their Personal Information. The following describes a Consumer's rights under the CCPA and how to exercise such rights:

### **Access to Specific Information and Data Portability Rights**

You have the right to request that PCA disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information PCA has collected about you.
- The categories of sources from which the Personal Information is collected.
- The business or commercial purpose for collecting or selling the Personal Information.
- The categories of third parties with whom PCA shares the Personal Information.
- The specific pieces of Personal Information PCA has collected about you.

- If PCA sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
  - The categories of your Personal Information that PCA has sold and the categories of third parties to whom your Personal Information was sold.
  - The categories of your Personal Information that PCA has disclosed for a business purpose and the categories of third parties to whom your Personal Information was disclosed for a business purpose.

### **Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 844-271-6058
- Sending a verifiable consumer request to [CCPArequests@packagingcorp.com](mailto:CCPArequests@packagingcorp.com)
- Visiting [www.packagingcorp.com](http://www.packagingcorp.com)

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **NON-DISCRIMINATION**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **CHANGES TO OUR PRIVACY NOTICE**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you through a notice on our website homepage.

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