



DATA PRIVACY

Last update March 2026

The following privacy policy applies to the use of the website belonging to

**PAWI Packaging
Deutschland GmbH**
Lise-Meitner-Strasse 4
DE-78224 Singen
info@pawi.com
www.pawi.com

**PAWI Packaging Poland
Sp. z o.o.**
ul. Sochaczewska 37
PL-01-327 Warszawa
info@pawi.com
www.pawi.com

(referred to as provider in the following) and informs you as a data subject in terms of data protection law and user of this website about the processing of personal data. Personal data is individual details about the personal or factual circumstances of an identified or identifiable natural person.

The data protection officer of the provider is

Irfan Cüven
PAWI Packaging Deutschland GmbH
Lise-Meitner-Strasse 4
DE-78224 Singen
privacy@pawi.com

You can contact our data protection officer directly if you have any questions or suggestions regarding data protection.

1. GENERAL INFORMATION

When you visit our website, the provider of this platform (or its webspace provider) collects data about every time the website is accessed. This access data includes:

- The name of the accessed website
- The IP address of the requesting computer
- The time and date of access
- The amount of transmitted data
- The browser type and version of the browser
- The operating system of the user
- The website from which the user reached this website (referrer URL)
- The IP address of the requesting computer
- The requesting provider

The aforementioned data is processed by the operator for the following purposes:

- Improving and guaranteeing connection to the website
- Improving the usability of the website
- Analysing system security and stability and
- Administrative purposes

The legal basis for data processing is Art. 6 para. 1 sentence 1 lit. f GDPR. The legitimate interest of the provider is a result of the purposes for data collection listed above. The data is anonymous and is stored separately from any personal data you may have given. It is not possible to draw conclusions about a specific person.

Your personal data will only be transmitted to third parties for the following purposes. Transmission does not take place for other reasons:

Personal data of the user is only passed on to third parties if:

- The user has given his/her express consent in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR
- Disclosure in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR is required for the assertion, exercise or defence of legal claims and there is no reason to assume that you have an overriding legitimate interest in the non-disclosure of your data
- In the event that a legal obligation for disclosure exists in accordance with Art. 6 para. 1 sentence 1 lit. c GDPR, and
- This is legally permissible and required for processing contractual relationships with the user in accordance with Art. 6. para. 1 sentence 1 lit. b GDPR

Cookies

We use cookies on our website. Cookies are small (text) files that are generated and stored on the end device of the user (for instance, smartphone, laptop, tablet, PC). Most cookies are so-called "session cookies" that are deleted at the end of the visit. In specific cases, however, these cookies provide information that allows for automatic recognition of the

user. By using a so-called cookie ID, websites and servers can be assigned to the specific Internet browser where the cookie was stored.

Cookies are used to make our website more user friendly and to collect statistical data on the use of the website.

If you do not consent to the use of cookies, you have the option of restricting or completely deactivating their use in your browser settings. If cookies are restricted or deactivated, the use of this website may also be restricted.

Integration of third-party services and content

This website uses content from third-party providers. These can be YouTube videos or graphics from other websites, for instance. In such cases, the third-party provider uses your IP address to make it possible to display this content.

Registration function

Users have the option of registering. If personal data is collected during registration (for instance, name, e-mail address), this data is used exclusively for utilisation of the website. If desired, the user can request details about information relevant to the website or registration from the provider.

The following data is collected during registration: First name, surname, postal address, e-mail address.

Newsletter

The provider of this website uses the newsletter to inform about specific offers.

If users of this website wish to receive the newsletter, an e-mail address is required. The e-mail address will only be used if the user has expressly consented to this in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR. This e-mail address is verified to make sure that the user is also the owner/authorised user of the e-mail address. The data is used exclusively for sending the newsletter and will not be passed on to third parties. No other data is collected.

The IP address and the date of registration are stored when registering to receive the newsletter. Storage serves exclusively as a protective measure in the event that a third party has misused the address and registered for the newsletter without the knowledge of the owner or authorised person.

Consent for storage of data and its use can be revoked at any time using a link in the newsletter itself or by sending a message to the above-mentioned contacts or by e-mail to privacy@pawi.com.

MailChimp (newsletter)

When the e-mail distribution list is used, the e-mail address of the user is initially stored temporarily with "MailChimp". Storage takes place solely for the purpose of confirming registration as part of the "double opt-in" procedure. Once the e-mail address has been confirmed, it is stored permanently by MailChimp. It will be stored until the e-mail address is deleted by the user (owner of the e-mail address) or by the operator of this website. The date of registration and the IP address of the user are also stored. This storage serves the purpose of providing evidence in the event of accusation of unsolicited sending of e-mails. The IP address is not used for any other purpose.

Contact form

Users of this website can contact the provider using a contact form. If you contact us, we store your data for the purpose of processing your request. The data is not passed on to third parties. Personal data is processed in accordance with Art. 6. para. 1 sentence. 1 lit. a GDPR on the basis of your voluntarily given consent.

2. TRACKING

Google Analytics (with anonymisation function)

This website uses Google Analytics, a web analysis service of Google Inc. ("Google"), Google Analytics-component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA. Google Analytics uses so-called "cookies". These are text files that are stored on the computer of the user and allow the use of the website by the user to be analysed. The information generated by the cookie about the use of this website (including the IP address) is transmitted to a Google server in the US and stored there. Your IP address will continue to be processed in anonymised form using the `_anonymizeIp()` method if this website is accessed from a member state of the European Union or another contracting state of the Agreement on the European Economic Area. A reference to a person can therefore be ruled out. If the collected user data is personally identifiable, it is immediately barred. The personal data is deleted immediately.

Google uses the information to analyse the use of the website, to compile reports on the website activities for the website operators and to provide additional services related to the use of the website and the Internet. Google may also transmit this information to third parties where legally required to do so, or where such third parties process the information on the behalf of Google. Google does not associate the IP address of the user with any other data held by Google.

Users may prevent the use of cookies by making appropriate settings in their browser; however, please note that if you do this, you may not be able to use the full functionality of this website. By using this website, the user consents to the processing of data collected about him or her by Google in the manner and for the purposes described above.

Users can prevent the collection and transmission of their usage-related data (including their IP address) to Google and the processing of this data by Google by downloading and installing the browser plug-in at <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. Users can also prevent future collection by Google Analytics by clicking on "Deactivate Google Analytics". Future collection of data when visiting this website is prevented by the setting of a so-called opt-out cookie. Additional information on Google Analytics and the applicable data protection provisions of Google can be called up at <https://policies.google.com/privacy?hl=en&gl=en> and <http://www.google.com/analytics/terms.html>. Google Analytics is explained in more detail at this link https://www.google.com/intl/en_en/analytics/.

This website uses Google Universal Analytics. This makes it possible to analyse user behaviour across all devices. Evaluation takes place with a user ID. You can deactivate analysis of your usage across all devices in your customer account under "My data", "Personal data".

The supervisory authorities have not yet issued a statement on the use of Universal Analytics. This means there will be a certain degree of legal uncertainty until either a statement or, if applicable, a court judgement is available. In any event, the data subject must be informed about the extended use and given the chance to opt out.

Mailchimp Tracking

We use the service "Mailchimp", provided by Intuit Inc., USA, to send our newsletter. As part of the newsletter registration process, the user's email address is temporarily stored by Mailchimp in order to enable confirmation of the registration within the legally required

double opt-in procedure. Once the user has confirmed the registration, the email address is permanently stored in our Mailchimp distribution list. The data will be stored until the email address is deleted either by the user or by us as the operator of this website.

In addition, the date and time of registration as well as the user's IP address are stored during the sign-up process. This data is used exclusively to verify the lawful registration process in case of misuse and to prevent unauthorized or unwanted mailings. The IP address is not used for any other purpose.

Mailchimp processes the data on our behalf as an external service provider. As Mailchimp has its headquarters in the United States, data is transferred to a third country outside the EU. We expressly point out that an adequate level of data protection within the meaning of the GDPR cannot be guaranteed for the USA and that access by US authorities cannot be excluded. Mailchimp relies on the Standard Contractual Clauses (SCC) adopted by the European Commission in order to ensure the highest possible level of data protection.

Mailchimp may also process tracking information in connection with the sending of newsletters. This includes, for example, information about whether a newsletter was opened or which links were clicked. This data helps us to improve the content of our newsletters. The evaluations may be assigned to individual recipient profiles. This notice has been recommended internally and is therefore part of this declaration.

The user may revoke consent to the storage and processing of data at any time. This can be done via the unsubscribe link at the end of each newsletter or by contacting us using the contact details provided in this privacy policy. After unsubscribing, the email address will be deleted without delay, unless statutory retention obligations apply.

3. MARKETING

Google Adwords

This website uses Google Adwords for the placement of online advertising. Cookies are used both by Google and by third-party providers (for instance, double-click cookies), sometimes also in combination. This enables the placement of optimised ads on Google and third-party websites based on the previous visits of the user to this website.

This website uses the following Google AdWords functions:

- Remarketing
- Interest categories
- Similar target groups
- Conversion tracking
- Other types of interest-based advertising

The information of the user (including the IP address) generated by the cookies is transmitted to a Google server in the US and stored there. Google truncates the last 3 digits of the IP address, which prevents the IP address from being assigned. Google has joined the "Safe Harbour Agreement" and complies with its data protection provisions. Data is only transmitted to third parties by Google when this is required due to legal regulations or in the context of order data processing. Under no circumstances does Google combine user data with other data collected by Google.

This website also uses so-called "retargeting tags". These are JavaScript elements inserted in the source code of this website. When you visit a page on this website that contains a "retargeting tag", a cookie is placed on the computer of the user by an online advertising provider (for instance, Google) and assigned to a retargeting target group list. The placement of the cookie allows interest-based advertising to be displayed on other websites visited by the user.

Users of this website can object to the collection and storage of data at any time with effect for

the future. Deactivating cookies is possible using the following links

[Setting for Google advertising and double-click cookies](#)

[Setting for third-party cookies and double-click cookies](#)

Conversion tracking of Google

This website uses conversion tracking as part of "Google AdWords". This is an analysis service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

When you click on an ad placed by Google, a cookie for conversion tracking is stored on the computer of the user. These cookies are valid for 30 days and do not contain any personal data. This means personal identification is not possible. If you visit this website before the cookie expires, both Google and we can see that the user has clicked on a specific ad and has been redirected to this page. Cookies cannot be tracked through the websites of AdWords customers, as each AdWords customer receives a separate cookie.

The information can be used to create conversion statistics for AdWords customers. This includes, for instance, information about the total number of users who have clicked on the ad. It is not possible to personally identify users. Participation in tracking can be prevented by forbidding the installation of cookies with appropriate browser settings. Additional information and the Google privacy policy can be found at:

<http://www.google.com/policies/technologies/ads/>,

<https://policies.google.com/privacy?gl=en/>

Google AdSense

This website uses Google AdSense, a service for integrating ads.

Google AdSense uses so-called "cookies" and web beacons (invisible graphics). Cookies are small text files that are stored on the computer of the user. They enable analysis of website usage. Web beacons are invisible graphics that are used to analyse various information (such as user traffic). The information is transmitted to a Google server in the US and stored there. The collected information may also be passed on to contractual partners by Google. However, the IP address is not combined with other user data. Installation of cookies can be prevented by changing the relevant browser settings. In this case, however, it is possible that not all functions of this website can be used.

4. RIGHTS OF DATA SUBJECTS

Users of this website have the right to:

- **Revocation of consent in accordance with Art. 7 para. 3 GDPR.** In the event of revocation, processing of the personal data of the user based on this consent may no longer be continued in the future.
- **Information in accordance with Art. 15 GDPR** about the personal data we process. In particular, this includes information about the purposes of processing, the category of personal data, the categories of recipients to whom the data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right of appeal, the origin of the data if it was not collected by the provider of this website, as well as the existence of automated decision-making including profiling and, if applicable, meaningful information on the details here.
- **Correction of incorrect or completion of personal data stored by the provider in accordance with Art. 16 GDPR.**

- **Deletion of personal data in accordance with Art. 17 GDPR.** This only applies insofar as processing is required for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the assertion, exercise or defence of legal claims.
- **Restriction of the processing of personal data in accordance with Art. 18 GDPR.** The prerequisite is that the correctness of the data is disputed by the user, the processing is unlawful, but the user refuses to delete it and the provider of this website no longer needs the data, but you need it for the assertion, exercise or defence of legal claims or you have objected to processing in accordance with Art. 21 GDPR.
- **Right to data portability in accordance with Art. 20 GDPR.** This includes the right of the user to receive his/her personal data provided in a structured, commonly used and machine-readable format or to request transmission to another controller.
- **Complaint to a supervisory authority in accordance with Art. 77 GDPR.** As a rule, the complaint can be lodged directly with the supervisory authority of the usual place of residence or workplace of the user or with the supervisory authority of the registered office of the operator.

5. RIGHT OF OBJECTION

If personal data is processed on the basis of legitimate interests in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR, the user has the right to object to the processing of his/her personal data in accordance with Art. 21 GDPR. The prerequisite here is that there are reasons arising from a particular situation of the user or that the objection is directed against direct advertising. In the latter case, the user has a general right to object, which is granted by the operator of this website without specifying a particular situation.

If you would like to exercise your right of revocation or objection, simply send an e-mail to privacy@pawi.com

6. DATA SECURITY

When visiting this website, the SSL (Secure Socket Layer) procedure is used in combination with the highest encryption level supported by the browser used by the user. This is typically 256-bit encryption. 128-bit v3 technology is used if the browser used by the user does not support 256-bit encryption. The encrypted transmission of a page of this website can be identified by the key or lock symbol in the status bar of the browser.

In addition to SSL encryption, technical and organisational safeguards are used to protect data against accidental or intentional manipulation, loss, destruction or unauthorised access by third parties. These safeguards undergo continuous improvement in line with technological developments.

7. TOPICALITY AND AMENDMENT OF THIS PRIVACY POLICY

Due to a change in the legal situation, official requirements or advancement of this website and corresponding offers, an adaptation of this privacy policy may become necessary. In this case, the current privacy policy can be accessed and printed out at any time using the URL.