



website privacy and cookies policy

This Privacy and Cookies Policy applies to the website www.dssmith.com ("the Site") which is run by DS Smith plc ("the Company") of 350 Euston Road, Regent's Place, London NW1 3AX.

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The Company recognises the importance of honest and responsible use of your personal information. This Privacy and Cookies Policy ("Policy") explains how the Company collects, uses and discloses personal information about you when you visit this Site and when you contact the Company, whether by e-mail, post, fax or telephone using the contact options on this Site. The information you provide to us through the Site will initially be collected by DS Smith Plc, but may then be shared with other DS Smith Plc Group companies. All references to "the Company" in this Privacy and Cookies Policy therefore include DS Smith Plc and any of its Group companies ("the Group"), unless stated to the contrary. Depending upon your relationship with the Company we may separately provide you with further details about our use of your personal information.

It is important to us that you feel comfortable in visiting the Site.

what type of information does the company collect and why?

When you visit our Site, we may automatically collect standard internet and website log information and details of patterns about how website visitors behave. The information we may collect includes information about your Internet service provider, your operating system, browser type, domain name, the Internet protocol (IP) address of your computer (or other electronic Internet-enabled device), your access times, the website that referred you to us, the Web pages you request and the date and time of those requests. This may allow us to find out which parts of the Site are popular or need changing. This is done in a way which does not identify any individual and we do not try to identify visitors to our Site or to link this information with any personal information we collect.

If you use our Site search facility, queries and results are logged anonymously without any user specific details being collected. Our collection of website use information may also involve the use of cookies and Web beacons. Please see the "Cookies" section below for more information.

If you want to contact us or to use certain facilities we provide on this Site, you will need to provide us with some additional personal information so that we can liaise with you and deal with your request, query or application. If you do choose to provide us with your personal information, we will collect that information for our own use and for the purposes described in this Policy.

what type of personal information does the company collect?

Where you choose to provide personal details to us, we may collect the following personal information from you:

- > your full name, title and gender;
- > your work and home contact details eg address, fax number, telephone numbers and e-mail address;
- > the reason for your contact, which may be an enquiry, a request or enquiry on behalf of someone else, a customer service need, providing a comment, a job application, or details in relation to a possible or existing order or service contract;
- > if you create an account - your username, password, e-mail address and your full name, address and telephone numbers;
- > employment and personal and educational details you choose to provide to use as part of any application for employment eg your employee ID, including social security number, other governmental identity number, and if needed, driver's license number and/or passport number, your date of birth, place of birth, nationality (and where applicable dual or former nationality) and eligibility (including evidence) to work in the relevant country;
- > financial account information, such as credit card number and other payment information;
- > your contact and marketing preferences;
- > if you take a survey or interact with us in various other ways - demographics information and information about subjects that may interest you;
- > information necessary for legal compliance (including details of disability; and/or
- > where you "like" us or make posts on our pages on social networking websites.

This information will be collected primarily from you as information voluntarily provided to us, but we may also collect it where lawful to do so from (and combine it with information from) public sources, third party service providers, individuals whom you have indicated have agreed for you to provide their personal information, government, tax or law enforcement agencies, and other third parties. We may also collect personal information about you from your use of other Group services. How does the Company use information about you?

how does the company use information about you?

The Company may use information about you for purposes described in this Policy or disclosed to you on our Site or with our services. For example, we may use information about you for the following purposes:

- > to respond and/or deal with your request or enquiry;
- > to process and administer your job or similar application(s) (including placement or apprenticeship opportunities, as appropriate), your order(s) or purchase(s) of our products and/or services and/or your application for charitable funding;
- > to improve our products and services and to ensure that content from the Site is presented in the most effective manner for you and for your computer (or other electronic Internet-enabled device);
- > to administer the Site;
- > for internal record keeping;
- > to contact you (directly, either by the Company or by the Group or through a relevant partner or agent) by e-mail or phone for the above reasons;
- > subject to your consent where required under applicable laws, to carry out direct marketing and/or e-mail marketing that you have requested;
- > where necessary as part of any restructuring of the Company or sale of a relevant Group company's business or assets;
- > to perform any contract the Company has with you; and
- > for compliance with legal, regulatory and other good governance obligations.

This list is not intended to be exhaustive and may be updated from time to time as business needs and legal requirements dictate. Some of the personal information that the Company maintains will be kept in paper files, while other personal information will be included in computerised files and electronic databases as set out in more detail below. In most cases, the information the Company processes about you is required to deal with your request or registration, or required by law, or is necessary for the exercise of the Company's legitimate business interests and needs, in which case special care is taken to safeguard your rights and to ensure any such use is proportionate.

The Company or Group may also convert personal information into anonymous data and use it (normally on an aggregated statistical basis) for research and analysis to improve Company/Group performance.

does the company share personal information with third parties?

Your personal information will be made available for the purposes mentioned above (or as otherwise notified to you from time to time), on a 'need-to-know' basis and only to responsible management, human resources, accounting, legal, logistics, audit, compliance, information technology and other corporate staff who properly need to know these details for their functions within the Group. Please note that certain individuals who will see your personal information may not be based at the Company or in your country (please see below).

We may share personal information within the Group as needed for reasonable management, analysis, planning and decision making, including in relation to taking decisions regarding the expansion and promotion of our product and service offering, order or customer request fulfilment and for use by those companies for the other purposes described in this Policy.

Your personal information may also be made available to third parties (within or outside the Group) providing relevant services under contract to the Company, or the Group (see below for further details), such as employment recruiters, human resources support services, credit card processors, auditors and compliance managers, providers or call centres and IT hosting and IT maintenance providers. These companies may use information about you to perform their functions on our behalf. The Company has put in place various security and data privacy measures, including with such third parties, in order to protect personal information and shall seek to comply with applicable legal requirements.

We may disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law and for tax or other purposes. Personal information may also be released to external parties in response to legal process, and when required to comply with laws, or to enforce our agreements, corporate policies, and terms of use, or to protect the rights, property or safety of the Company, our employees, agents, customers, and others, as well as to parties to whom you authorise the Company to release your personal information.

We will not sell your personal information to any third party other than as part of any restructuring of the Company or Group or sale of a relevant Group business.

will your personal information be transferred abroad?

Some transfers of personal information have been explained above. Individuals within the European Economic Area ("EEA") should be aware that recipients of their personal information, within the Group or third parties (as set out in this notice), may not be located within the EEA but instead located in countries which do not have equivalent protection for personal information to that within the EEA. Steps will be taken to protect your personal information in that instance consistent with applicable law.

what choices does the company offer you with regard to direct marketing?

The Company may wish to provide you with information about new products, services, promotions and offers, which may be of interest to you and may invite you to take part in market research or request feedback on our products and services and the Group's products and services. This communication may occur by e-mail, telephone, post or SMS. We will obtain your consent and advise you of how to opt-out of receiving such communications where we are required to do so in accordance with applicable law.

what safeguards are in place to protect your personal information?

The Company takes reasonable steps to maintain appropriate physical, technical and administrative security to help prevent loss, misuse, unauthorised access, disclosure or modification of personal information. While we take these reasonable efforts to safeguard your personal information, we cannot guarantee the security of any personal information you disclose online. You accept the inherent security implications of dealing online and will not hold us responsible for any breach of security unless such breach has been caused by the specific negligence of the Company, the Group or their agents.

what rights do you have to review and amend personal information?

You have the right to review your personal information held by the Company and have certain inaccurate information about you corrected. If you wish to do so, or to notify the Company of a change in your details, please contact your local data protection officer (DPO), by e-mail to matthew.jowett@dssmith.com and/or post to [DPO, DS Smith Plc, 350 Euston Road, Regent's Place, London NW1 3AX]. If applicable under local laws, such a request may need to be in writing and with payment of a statutory fee.

If you have a question about the use of your personal information, or wish to be in a complaint about it, please contact your local DPO, using the contact details set out above, in the first instance. In the event of any unresolved inquiry or an unsatisfactory response, you may contact Matthew Jowett, DS Smith Plc's Group General Counsel and Company Secretary.

keeping you informed

We will keep your details on record until we have completely dealt with your request, enquiry or application and then for a reasonable period afterwards, in accordance with data protection and other applicable legislation.

The Company may keep your details on record for up to [12] months during which time, we may contact you to let you know if the Company has any further information relating to your initial enquiry or application. At the end of that period we will securely delete your details and will not contact you again unless or until you request us to do so.

how we use cookies

We use cookies for certain areas of our Site. Cookies are small data files stored on your hard drive by a website. Cookies help us improve our Site and your experience. We use cookies to see which areas and features are popular and to count visits to our websites, to recognise you as a returning visitor and to tailor your experience of the Site according to your preferences. Overall, cookies help us provide you with better websites, by enabling us to monitor which pages you find useful and which you do not. We may also use cookies for targeting or advertising purposes. We may use Web beacons on our Site or in our e-mails. Web beacons are electronic images that may be used to deliver cookies, count visits, understand usage of Group websites and to tell if an e-mail has been opened and acted upon. Further details about cookie purposes and types are below. To delete or block cookies by browser settings at any time and for more general information about cookies including the difference between session and persistent cookies, visit www.allaboutcookies.org.

We also use Google Analytics on our Site to collect information about your online activity on the Site, such as the Web pages you visit, the links you click, and the searches you conduct on the Site. We use the information to compile reports and to help us improve the Site. The cookies collect information in an anonymous form, including the number of visitors to the Site, where visitors have come to the Site from and the pages they visited. For more information about the information gathered using Google Analytics please visit <http://www.google.com/intl/en/analytics/privacyoverview.html>. You can prevent these cookies by selecting the appropriate settings on your browser. If you do this you may not be able to use the full functionality of this Site. You may download and install the Google Analytics Opt-out Browser Add-on available here: <http://tools.google.com/dlpage/gaoptout>.

The cookies used on our Site are categorised in accordance with the International Chamber of Commerce United Kingdom Cookie Guide as follows:

- > Cookies which are "strictly necessary" for functionality of the Site's platforms. These cookies are essential in order to enable users to move around the Site and use its features.
- > "Performance" cookies which collect information about how users navigate the Site, for example, which pages users access most frequently. They identify how users interact with our Site, any errors that occur, which pages are not used often, which pages take a long time to load, which pages users tend to visit and in what order. These cookies do not collect any information which could identify you and are only used to help us improve how our Site works and understand what interests our Site's users.
- > "Functionality" cookies which allow the Site to remember choices you make and your preferences as a logged in user (based on e.g. your user name).
- > "Targeting or advertising" cookies used to deliver adverts relevant to an identified machine or other device (not a named or otherwise identifiable person) which are tailored to interests associated with the website activity tied to that machine or device. For example, if a cookie on a third party website recognises that a particular product was purchased from a particular device, that cookie may "talk to" marketing cookies on the Site to ensure advertisements about similar products displayed on the Site are accessed from that device. These cookies are also used to limit the number of times a user sees an advertisement as well as to help measure the effectiveness of an advertising campaign. They may also remember that the Site has been visited from a device and share that information with marketing organisations. The marketing cookies on our Site are operated by third parties with our permission. Marketing cookies are used to monitor from which advertising source a user was directed towards our Site so that we know whether it is worth us investing in that particular advertising source.

cookie name/type	expiration period	purpose	category of cookie as defined in the ick cookie guide
SESSxxxID	Session (these cookies typically expire at the end of your session or at the latest within one week)	Authentication session to prevent having to login multiple times in one browser session. A unique ID that ties the current session to a database settings table	Strictly necessary/ Functionality
has_js	Session (these cookies typically expire at the end of your session ie when you close your browser)	This helps the website understand your Web browser's javascript functionality. An on/off flag that denotes whether or not the browser supports javascript.	Strictly necessary/ Functionality
cookie-agreed-en	4 months from set/update	Enables us to remember if you accept cookies from this website. An on/off flag that denotes whether or not you accept cookies.	Strictly necessary/ Functionality
Google Analytics utma	2 years from set/update	Provides a unique ID for each Web browser that visits this site.	Targeting/advertising
Google Analytics utmb	Session 30 minutes from set/update	Used to establish and continue a user session with this website.	Targeting/advertising
Google Analytics utmc	Session (these cookies typically expire at the end of your session ie when you close your browser)	Used to establish and continue a user session with this website.	Targeting/advertising
Google Analytics utmz	6 months from set/update	Used to calculate search engine traffic, ad campaigns and page navigation within this site.	Targeting/advertising

cookie settings

We will ask for your consent to the use of cookies set out in this Privacy and Cookies Policy when you first access the Site and if we introduce any new cookies to the Site. When you first visit the Site, a box/banner will appear asking you to agree to the cookies that we set on the Site. Your continued use of the Site will be treated as consent to the use of these cookies for the purposes described.

If you reject cookies by clicking on "No thanks", we will not set any further cookies on your device, except that we will set the "Strictly necessary" cookies detailed above (including a cookie to remember that you don't want any cookies set when you visit the Site).

You can usually choose to set your browser to warn you when a cookie is being sent or to remove or reject cookies. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookie settings. If you choose to remove or reject cookies, it will affect many features or services on our Site.

If you agree to cookies we have set on our Site by clicking on the "[I agree]" button), we will set cookies on your device. If you wish to delete the cookies we have set on your device, please refer to your browser Help menu.

If you do nothing to indicate your cookie preference for our Site (i.e. if you do not click on either "I agree" or "No thanks"), we will treat this as acceptance and set cookies on your device. To modify your cookie settings, please refer to the Help menu of your browser.

changes to this privacy and cookies policy

We keep this Policy under regular review. We may change this Policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. The date at the top of this Policy will be updated accordingly.

We encourage you to check the date of this Policy when you visit this Site for any updates or changes. We will notify you of any modified versions of this Policy that might materially affect the way we use or disclose your personal information.

By using our Site, submitting your personal information to us and/or registering an account, you consent to the use of your personal information as described in this Privacy and Cookies Policy (as amended from time to time).

contact/address details

If you have any questions about this Privacy Policy, please contact us at:

Matthew Jowett
Group General Counsel and Company Secretary
DS Smith Plc
350 Euston Road
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London
NW1 3AX

matthew.jowett@dssmith.com

More information regarding your rights can be obtained from your local data protection authority, details of which are available from your local DPO.

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