



Global Privacy Policy

Your privacy is of paramount importance to us

Company: Lightweight Containers
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Introduction

At Lightweight Containers we are committed to ensuring that your personal information is protected and never misused.

Our privacy policy explains what personal information we collect, why we collect it, how we use it, the control you have over your personal information and the procedures we have in place to protect your personal information. It applies to personal information we collect through our Lightweight Containers websites, through Lightweight Containers apps (including the KeyKeg (VR) App for iOS and Android) and in person at our Lightweight Containers stands and events.

By sharing your personal information with us, and by continuing to use our websites, apps and products, you confirm that you have read and understood the terms of this privacy policy. We take responsibility for the personal information we collect about you, and we aim to be transparent about how we handle it, and give you control over it.

In this privacy policy, when we refer to "Lightweight Containers", "us", "we" or "our", we mean the Lightweight Containers group company or companies which provide you with the Lightweight Containers websites, apps or products or which are responsible for stands or events in your country. In this privacy policy, when we refer to the "Lightweight Containers Group", we mean all Lightweight Containers group companies.

If you have any questions, comments or concerns about any aspect of this privacy policy or how Lightweight Containers handles your information, please email our Privacy Team at privacy@lightweight-containers.com.

Privacy principles

Privacy policies can be complicated. We have tried to make ours as clear and as accessible as possible. To help, we have also summarised how we handle your personal information at Lightweight Containers in our privacy principles below. These principles demonstrate our commitment to protecting your privacy and handling your personal information in the right way and as you would expect it to be handled.

At Lightweight Containers we:

1. Will only ask for or collect the personal information we need to provide and improve the service, products and experiences our customers expect.
2. Give you control over the personal information we hold about you to ensure it is accurate and reflects your preferences.
3. Make sure your personal information is always secure and protected.
4. Are fair and transparent about how we use the personal information we hold.
5. Only ever use your personal information for the purpose that you trusted us to use it for.
6. Will never sell your personal information and only share it as outlined in our privacy policy or when you ask us to.
7. Respect your choices and will inform you if there are important changes that affect your personal information or how we use it.
8. Take responsibility for the personal information that we hold about you.

Privacy policy

1. What personal information do we collect?

We are not interested in collecting every personal detail about you. Our main reason for collecting your personal information is to provide and improve the service, products and experiences that you and our customers expect from us.

Personal information is defined slightly differently across the world. To guarantee your privacy and the protection of your information, we define it as any information that could be used to identify you or another individual.

We collect personal information about you in a number of different ways. In this section, we explain the different ways we collect personal information about you and the ways in which that information will be used. For more detail on how we use your personal information, please see the section titled "[How do we use your personal information?](#)".

Information you share with us

We collect personal information that you share with us when you contact us or interact with us through our website, apps, email, phone, in person at our stands and events, or otherwise.

For example, you will provide information to us when you contact our sales teams, place an order, register to KeyKegUsers, complete a survey, competition or questionnaire, update your preferences and account information, connect through a Lightweight Containers app or apply for a job on our website.

Through these interactions you may share with us: your name, address, e-mail address, contact number and payment information. In some circumstances, we will need that information to be able to provide you with a product or service that you have asked for; for example, we need your payment information when you buy a product, and your address to deliver it to you.

You can also ask us to delete it at any time by contacting Lightweight Containers or by e-mailing our global privacy team at privacy@lightweight-containers.com.

If you share details of other people with us (for example, if you have bought a Lightweight Containers product for that other person or if you register another person for a Lightweight Containers app), then you will need to check with that person that they are happy for you to share their personal information with us, and for us to use it in accordance with this privacy policy.

Information from Lightweight Containers products

As well as the personal information you share with us about yourself and your Lightweight Containers product, we will collect and handle personal information directly from your Lightweight Containers products. This is possible with a Lightweight Containers product that works in combination with a Lightweight Containers app.

We will collect information about your use of our products (for example, when they are used and for how long).

Some of the information we collect from your use of our products and apps will enable us to determine the location of your product. In particular, you will need to enable location tracking on your phone (or other device) when you first register (otherwise, we will not be able to connect). It is useful for us to know your location so that we can understand the environmental conditions in which your product is used which helps us to optimise the performance of the product.



Information from your online interactions

We collect and store limited personal information and some anonymous, aggregate statistics from all visitors to our websites and users of our apps, whether you actively provide us with that information or merely browse our websites or use our apps. The information we collect includes the internet protocol (IP) address of the device you are using, the browser software you use, your operating system, the date and time of access, the internet address of the website from which you link through to our website and information on how you use our websites or apps.

We use this information so that we can see how well our websites and apps are working, how they are used and what users look at most.

We also collect and handle information about how you engage with our promotional campaigns and advertising online, outside of our own websites (for example, on Google, YouTube and on social media).

That information is, predominantly, collected through our use of cookies and similar technologies.

Cookies

We use cookies on our websites and apps. "Cookies" are small text files that websites save onto your device via your web browser. They've been around since the mid-1990's and are one of the most widely used technologies on the internet.

Some cookies that we use at Lightweight Containers will collect personal information about you. Any personal information that is collected will be used in accordance with this privacy policy. By continuing to use our websites and apps, you accept that cookies will be set on your device.

For further information, including on the types of cookies that we use and how to manage cookies placed on our websites, please refer to our cookies policy. Please note that we do not currently respond to Do Not Track (DNT) signals.

Email Communications

As a user of our products or services, we will send you support communications by e-mail. As long as you are happy for us to do so, we would also like to keep you posted on anything that's happening at Lightweight Containers which we think you might like to know about; whether it's our latest product announcements, owner offers or upcoming events, we want to make sure you're happy with the communications you receive from us. You can find out how to update or change whether you would like to hear from us, or stop us contacting you, in the section below titled '[How can you change the way that we contact you?](#)'.

We collect information about how you engage with our e-mails; including whether they are delivered to you, whether you open them, whether you choose to learn more about what's happening at Lightweight Containers (for example, by clicking on a link in our e-mail) and if you ask us not to contact you anymore (by clicking on the unsubscribe option included in all our e-mail correspondence).

We use that information by itself and in combination with your customer record (the information you share with us) to make sure that we stop sending you support or marketing communications when you ask us to. We also use it to make our e-mails as interesting as possible by providing you with content and experiences that we think you will be interested in based on how you have engaged with our previous e-mails; you have the right to object to our use of your information for this purpose (see the section below titled '[Your controls and choices](#)').

Social Media

We love interacting with you on social media. You may use social media to contact us about your Lightweight Containers products, or to let people know what you think about your Lightweight Containers product. We review publically available social media and online sites to get a better understanding of what people are saying about us, and our products, technology and services and to assist parties who prefer to contact us through social media.

The information we collect from social media and online sites, including Facebook, YouTube, Twitter, Instagram and LinkedIn, sometimes includes personal information that has been put online and is publically available. We make sure any information we use is properly credited to its source or is made anonymous.

These online and social media sites typically have their own privacy policies explaining how they use and share your personal information. You should carefully review those privacy policies before you use these sites to make sure that you are happy with how your personal information is being collected and shared.

Information we collect at our stands and events

You may share personal information with us when you visit us in person at our stands and events; such as your name, contact details and payment information (see the section above titled "[Information you share with us](#)").

We will also collect personal information about you through our use of security cameras (CCTV), filming and photography. Security cameras are primarily used for security purposes; in and around our headquarters and assembly lines. We will film and take photographs at some of our events and exhibitions (such as, when we launch a new product); we use film and photographs for our business purposes (for example, to post on our social media pages). We will display notices at those of our stands and events where we use security cameras, or where we intend to film or take photographs, to let you know that we will collect personal information about you. We will not display notices of security cameras of external parties (for example like the security cameras of exhibition halls).

If you have Wi-Fi or Bluetooth enabled on your phone (or other device) when you visit us at our stands and events, we will also collect limited personal information through your device.

Information we collect from third party data providers

We collect company information, including business sector and company size that provide insights into market developments, from third party data providers who help us to give you a more relevant owner experience by enabling us to provide offers at the right time, and to give you more relevant services and advice.

2. How do we use your personal information?

Our main reason for collecting and using your personal information is to provide and improve the service, products and experiences that you expect from us.

Information you share with us

We use the personal information you share with us in the following ways:

- To respond to your queries and requests;
- To communicate with you;
- To provide services and support for our products;



- For customer satisfaction surveys to enable us to identify where service and product improvements can be made and to allow us to improve your experience should you need support from one of our experts;
- To provide updates to you about any changes to Lightweight Containers' policies, terms and conditions and any other matters which we may need to tell you;
- As long as you are happy for us to do so, to tell you about our other products and services;
- To provide you with essential service updates about your Lightweight Containers products; and
- To customise and improve your 'journey' with us in the future; for example, by showing you products and offers that we think you might like, both on our websites and apps and on certain third party websites (including on social media platforms).

Information from Lightweight Containers products

We use the personal information we collect from Lightweight Containers products, by itself and in combination with other personal information that we collect about you, in the following ways:

- To monitor your use of our products so that we can optimise their performance and your experience of using them;
- To improve our products, technology and services generally;

We also want to be able to monitor your use of our products, so that we can:

- Customise and improve the way that we engage with you in future (for example, by showing you products and offers online that we think you might like); and
- (as long as you are happy for us to do so) send you more relevant and interesting marketing communications.

You have the right to object to our monitoring of your use of our products and apps for these purposes. For more information on how to exercise your right to object, see the section below titled '[Your controls and choices](#)'.

Information from your online interactions

We use the personal information from your online interactions, by itself and in combination with other personal information that we collect about you to identify any part of our websites or apps that aren't working as well as they should be – so that we can fix things and make our websites and apps better for you and other users;

We also want to be able to monitor your use of our websites and apps, and how you engage with our promotional campaigns and advertising online, so that we can:

- Customise and improve the way that you shop with us in future (for example, by showing you products and offers that we think you might like); and
- (as long as you are happy for us to do so) send you more relevant and interesting marketing communications.

You have the right to object to our monitoring of your use of our websites and apps, and how you engage with our promotional campaigns and advertising online for these purposes. For more information on how to exercise your right to object, see the section below titled '[Your controls and choices](#)'.

Other potential uses of your personal information

We use your personal information:

- To assist in any disputes, claims or investigations relating to your Lightweight Containers product or warranty matters;

- To detect and prevent fraudulent transactions;
- To comply with our legal obligations; and
- For profiling and statistical analysis. As part of this activity we combine different categories of personal information that we collect about you. For example, we combine personal information from your online interactions, information you share with us, or information from Lightweight Containers products, for the profiling and statistical analysis of product popularity, of your behaviour when you use our website or apps or of how our products are used. You have the right to object to the processing of personal information in this way. For more information on how to exercise your right to object, see the section below titled '[Your controls and choices](#)'.

What is our justification for handling your personal information in this way?

Data protection and privacy laws in some countries require us to have what's called a "legal basis" or "lawful ground" for handling personal information. Broadly, that means that we have to have a legal justification for handling your personal information. For the most part, we need to handle your personal information to be able to:

- provide you with the products or services that you have asked for; and
- for our products, websites and apps to be able to work properly and to do all the things that you expect them to.

Sometimes, our use of your personal information is not strictly necessary for us to be able to provide you with our products and services, or for them to work properly. In those circumstances, we have what's called a "legitimate interest" in handling your personal information; our "legitimate interest" may be to:

- detect and prevent fraud;
- keep our websites, apps, products and IT systems secure;
- ensure that our own processes, procedures and systems are as efficient as possible;
- analyse and enhance the information that we collect;
- determine the effectiveness of our promotional campaigns and advertising; and
- customise and improve the way that you shop and engage with us in future.

You can ask us to delete your information at any time by contacting Lightweight Containers or by e-mailing our global privacy team at privacy@lightweight-containers.com.

Finally, in some, relatively limited circumstances we will need to handle your personal information in a certain way to be able to comply with our legal obligations; for example, if we are requested to disclose your personal information to regulatory bodies or law enforcement authorities.

Ultimately, the reason we handle your personal information in the way we do is so that we can directly or indirectly, improve our products, services and your overall experience of Lightweight Containers as a business. Whatever our justification for handling your personal information (whether it is necessary for us to provide you with a certain product, or it is in our "legitimate interests"), we make sure that we take steps to honour our commitment to protect your privacy.



3. Lightweight Containers contact promise

We love to keep you posted, whether it's on our latest product announcements, owner offers, opportunities to test new Lightweight Containers products, or upcoming events.

We do this in various ways, including e-mail, post, SMS, in-app and push notifications, via social media platforms and by phone, but only if you are happy for us to do so. Ultimately, we want to make sure you're happy with the communications you receive from us.

We therefore promise to:

- Only send you marketing communications when you have told us it is ok to do so;
- Only allow another Lightweight Containers Group company to send you marketing communications if you have told us it is ok to do so;
- Never pass your personal information to anyone outside the Lightweight Containers Group for them to use for their own marketing purposes; and
- Give you the option to stop receiving support or marketing communications at any time.

4. Lightweight Containers owner support

From time-to-time, we use your personal information to help you with the Lightweight Containers products you own. We do this in various ways, including e-mail, post, SMS, phone and in-app and push notifications.

As a user of our products or services, we will send you the following support communications:

- Helpful information about your Lightweight Containers product or the Lightweight Containers service you use;
- Helpful information about your Lightweight Containers product for optimal performance;
- Alerts for recommended app updates or upgrades that we think will improve the performance of your product;
- Information about how and where to get help from Lightweight Containers experts should you need support;
- Alerts regarding any important product safety or recall announcements; and
- Requests for your feedback on how we perform after you have used a Lightweight Containers product or service.

We will send you support communications unless you change your preferences, or tell us that you want to stop receiving support communications from us. Please see the section below for more information about how to do this.

If your details change, please let us know so that we can continue to stay in touch.

5. How can you change the way that we contact you about our products, services and support?

We will only send you marketing communications when you have told us that you are happy for us to do so.

You can change the way that we contact you in the following ways:

Opt-In/Start Contacting Me

If you hadn't previously asked us to send you marketing communications, you can ask us to start contacting you (sometimes called an "opt-in") by:

- Contacting the Lightweight Containers sales team and stating that you would like to receive communications from us, or
- Opt-In your email address on our website.

Changing your preferences

If you have previously said that you would like us to contact you ("opted-in") but would like to change or update the way that we do so, you can update your preferences by:

- Contacting the Lightweight Containers sales team and stating that you would like to change or update the way that we contact you; or
- Using the update preferences option included in all our e-mail correspondence (on all marketing and support communications).

Opt-Out/Stop Contacting Me

If you want to stop receiving marketing or support communications from us (sometimes called "opting out"), you can do so at any time by:

- Contacting the Lightweight Containers sales team and stating that you no longer wish to receive such communications;
- Using the unsubscribe option included in all our e-mail correspondence (on all marketing and support communications), or
- Emailing our global marketing team at marketing@lightweight-containers.com or our global privacy team at privacy@lightweight-containers.com.

6. What personal information does Lightweight Containers share with third parties?

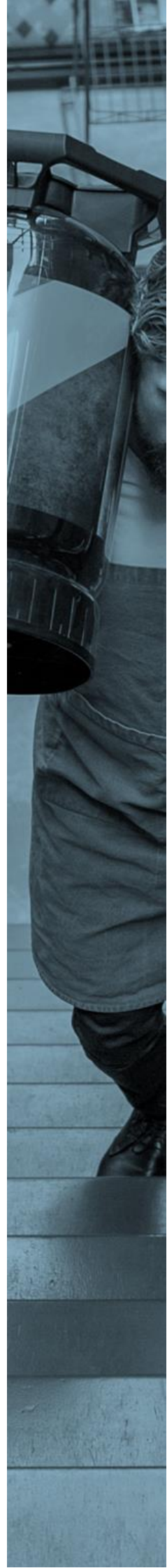
Most importantly, we never sell your personal information to anyone and only share it as outlined in this privacy policy or when you ask us to.

Sharing within the Lightweight Containers Group

Most of Lightweight Containers' processes, procedures and systems are shared across the Lightweight Containers Group, which means that we need to share your personal information between us. We make sure that access to your personal information is limited to those of our staff who need it, and that all staff understand how and why we protect your personal information.

Third party service providers

We share your personal information with certain third party service providers. They only have access to the personal information they need to perform those services. They are required to keep your personal information confidential and may not use it other than as we ask them to and



always in accordance with this privacy policy. Those third party service providers fall into the following categories:

- Those helping us to deliver products to you;
- Third parties that help us with mailing services, processing product purchases, financial services, audit services, administrative services, IT technologies (e.g. data storage), security services and insurance claims; and
- Third parties that help us to provide services and responses to you.

Third parties that help us with our advertising and marketing

We want to make sure that our advertising and marketing is relevant and interesting to you and our other customers. That means that we work with third parties to help us to understand how well our online advertising works, or to reach people who are more interested in Lightweight Containers products. They do this by setting cookies on our website (more information on this can be found in our cookies policy).

We will also share limited personal information with:

- social media platforms (such as Facebook), who serve our advertising on their platforms and
- third party data providers and analytics companies, who perform data matching and/or data analysis on our behalf (such as Google Analytics).

Other third parties

We share certain personal information with third parties who help us to detect and prevent fraudulent transactions. The information we share with those third parties includes some of the information that you share with us (such as, your contact details and information about the transaction), and some of the information from your online interactions (such as the IP address of your device). That information is used to determine whether a transaction could be fraudulent. One of the third parties we use to help us detect and prevent fraudulent transactions is Atradius; they are responsible for their use of your personal information and will use it for the purposes set out in their privacy policy.

We will also share your personal information if we are required to do so by law, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.

If you would like more information on how we share your personal information, please email our Privacy Team at privacy@lightweight-containers.com.

7. Links to third party websites

We provide links to other websites which are not operated and controlled by Lightweight Containers. We have no control over and are not responsible for the content of those sites or how the third parties responsible for them collect and use your personal information. We do not endorse or make any representations about third party websites.

Third party websites usually have their own privacy policies explaining how they use and share your personal information. You should carefully review those privacy policies before you use these websites to make sure that you are happy with how your personal information is being collected and shared.

8. How long do we keep your personal information?

We only keep your personal information for as long as we need to, to be able to use it for the reasons given in this privacy policy, and for as long as we are required to keep it by law. The actual

period for which we store your personal information will vary depending on the type of personal information and how it is used.

9. Your controls and choices

Where possible, we give you control over the personal information we collect about you, to ensure it is accurate and reflects your preferences. You have the right to access, update and amend personal information that we hold about you; you can do that in relation to some of your personal information in your account. If you would like to change the way that we contact you, see the section above titled ['How can you change the way that we contact you about our products, services and support?'](#)

In certain circumstances, you can also:

- Object to our use of your personal information for certain purposes;
- Ask us to limit or restrict our use of your personal information;
- Ask us to correct, remove or delete personal information about you; or
- Ask us to provide your personal information to a third party provider of services.

Please note that those rights do not always apply and there are certain exceptions to them. We will also need to confirm identity before acting on certain requests.

If the law in your country allows us to impose a fee for giving you access to your personal information, or to exercise any of your other rights in relation to your personal information, we will let you know.

If you would like to exercise any of your rights in relation to your personal information, please email privacy@lightweight-containers.com.

10. How do we protect your personal information?

We are committed to protecting your personal information. We use appropriate technical and organisational measures, including encryption, to protect your personal information and privacy, and review those regularly. We protect your personal information using a combination of physical and IT security controls, including access controls that restrict and manage the way in which your personal information and data is processed, managed and handled. We also ensure that our staff are adequately trained in protecting your personal information. Our procedures mean that we may occasionally request proof of identity before we share your personal information with you.

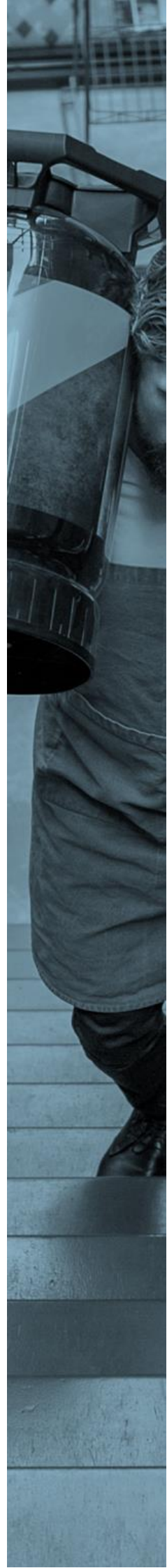
In the unlikely event that we do suffer a security breach which compromises our protection of your personal information and we need to let you know about it, we will do so immediately.

11. Data transfers, storage and the global handling of your personal information

The relevant Lightweight Containers group company or companies will collect personal information from you in the country in which you live. We, and those third parties that we share your personal information with, then host, store and otherwise handle that information in the Netherlands (at our headquarters and other third parties), in the countries within the European Economic Area ("EEA") and Switzerland or in any country outside of the EEA.

We will make sure that any transfers of your personal information from one country to another comply with those data protection and privacy laws which apply to us. European data protection laws, in particular, include specific rules on transferring personal information outside the EEA.

When transferring personal information outside the EEA, we will:



- include standard data protection clauses approved by the European Commission (“EC”) for transferring personal information outside the EEA into our contracts with those third parties (these are the clauses approved under Article 46.2 of the General Data Protection Regulation (“GDPR”)); or
- ensure that the country in which your personal information will be handled has been deemed "adequate" by the EC under Article 45 of the GDPR.

In any case, our transfer, storage and handling of your personal information will continue to be governed by this privacy policy. If you would like further information about the global handling of your personal information, please contact us at privacy@lightweight-containers.com.

You can find out further information about the rules on data transfers outside the EEA, including the mechanisms that we rely upon, on the EC website [here](https://ec.europa.eu/info/data-protection/for-business/adequacy-decisions).

12. Changes to this privacy policy

We will review this privacy policy at least once a year, update if necessary and will note the date it was last updated below.

If we change our privacy policy, we will post the details of the changes below. If we have your e-mail address, we may also e-mail you with information on those changes. If we need to, we will also ask you to confirm that you are happy with those changes.

This privacy policy was last reviewed and updated in May 2018.

13. Previous changes to this privacy policy

May 2018:

We updated our Global Privacy Policy to comply with the requirements of new European data protection laws (specifically, the GDPR).

14. Translations of this privacy policy

This privacy policy has been translated from Dutch into the official language of a number of different countries. We have done this to make sure that the policy is clear and accessible to all users of our websites, apps and products.

If there are any conflicts or inconsistencies between the translated versions of this privacy policy, the Dutch version will prevail.

15. Contact us

If you have any questions, comments or concerns, or would like to make a complaint about how we use the personal information we hold about you, please email, or write to, our Privacy Team at privacy@lightweight-containers.com.

You can also contact the relevant regulator or authority in your country that is responsible for handling complaints about the use of personal information.

You can contact our Privacy Team at any time by email at privacy@lightweight-containers.com or in writing at C/O The Privacy Team, Lightweight Containers, Koperslagersweg 4, 1786 RA Den Helder, The Netherlands. [You can also contact the relevant Data Protection Officer(s) in your country]. We will get back to you as soon as possible.