



Data Protection at Multi-Color Corporation (MCC)





Commitment to Data Protection

At Multi-Color Corporation (MCC), we are committed to protecting the personal data of our employees, clients, suppliers, and business partners. We adhere to high standards of data protection and comply with the EU General Data Protection Regulation (GDPR) and other applicable laws.

Privacy Program Overview

Our privacy program is designed to ensure the secure collection, processing, and storage of personal data. We have implemented a centralized privacy model that allows us to maintain a consistent and efficient approach across all our operations.

Key Aspects of Our Privacy Program

A. Unified Strategy and Consistency:

- We maintain a consistent approach to data protection across all departments and subsidiaries.
- This ensures that our policies and procedures are harmonized, reducing the risk of discrepancies and non-compliance.

B. Efficient Resource Utilization:

By centralizing our data protection efforts, we can allocate resources more effectively, ensuring that our measures are not duplicated.

C. Expertise and Specialization:

Our Global Data Protection Officer (GDPO) provides high-level advice and guidance, ensuring compliance with evolving regulations.

D. Enhanced Oversight and Control:

Senior management has direct oversight of data protection practices, facilitating quick decision-making and effective implementation.

E. Effective Risk Management:

We manage risks more effectively by having a comprehensive view of data processing activities and potential vulnerabilities.

F. Regulatory Compliance:

Our proactive stance helps us adapt to new or amended data protection regulations, preventing regulatory infractions.



Safeguards for International Data Transfers

MCC ensures that international data transfers are conducted in a manner that protects privacy and complies with global data protection standards. We apply the following safeguards:

Adequacy Decisions: transfers to countries with an adequate level of data protection as deemed by the European Commission.

Intragroup Data Processing Agreements: ensuring protection across all MCC entities worldwide.

Standard Contractual Clauses (SCCs): legal mechanisms for transfers to countries without an adequacy decision.

Additional Technical and Organizational Measures: including encryption, pseudonymization, and regular security audits.

Transfer Impact Assessments (TIA): evaluations of potential risks to personal data in the destination country.

Transparency and Data Subject Rights

We are committed to full transparency regarding our data processing activities. Our privacy notices inform data subjects about:

The identity of the data controller

Processing purposes and legal bases

Data recipients and retention periods

Data subject rights, including access, rectification, erasure, restriction, objection, portability, and withdrawal of consent

Handling Complaints

MCC takes privacy complaints seriously. You can report any concerns or issues through the following channels:

- **Contacting the GDPR or Legal Department:** email us at legal@mcclabel.com
- **Using MCC's Ethics Line:** managed by an independent third-party vendor, ensuring confidentiality and anonymity. Available 24/7 online or by telephone.



Relationships with Third-Parties

When we authorize a supplier to process personal data on our behalf, we ensure they provide appropriate security measures. Our due diligence process includes:

- **Qualification of the third party (processor, sub-processor, joint-controller, or independent controller)**
- **Risk assessment to evaluate personal data protection levels**
- **Annual or biennial reassessments for high or low-risk third parties, respectively**

Data Security and Best Practices

We prioritize securing our digital and physical infrastructures to protect personal data. Our practices include:

- **Adhering to "data protection by design and by default"**
- **Implementing high-standard security measures for identification, authentication, and authorization**
- **Following best practices like ISO 27001 and 27701**

Continuous Improvement

Based on audits, KPIs, and employee feedback, we continuously enhance our privacy program by updating policies, enhancing training programs, and implementing new technologies.

By maintaining these high standards, MCC ensures the trust and confidence of our employees, clients, suppliers, and business partners.

Disclaimer

This document provides an overview of Multi-Color Corporation's (MCC) data protection policies and practices. It is intended for informational purposes only and should not be construed as legal advice. MCC does not accept any responsibility or liability for actions taken based on the information contained in this document.

For detailed and up-to-date information on our data protection policies and procedures, please refer to our official privacy notices or contact our Global Data Protection Officer.

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