

Contact officer: Name: Nick Jansen Function: COO/ Director Europe	Information Security Management System Policy	Version: 1.0 Issue date: 01 2019 Review date: 01 2020
---	--	--

Introduction

LC Packaging International B.V. information security values are supported by three main principles: confidentiality, integrity and availability. LC Packaging International B.V. strives to ensure strong and rigid information security measures to protect its information and guarantee business continuity. One of the central topics within the following document is the protection of individual rights and freedoms. This is supported by our General Data Protection Regulation compliance and internal processes. We must protect all data within LC Packaging International B.V. operations and guarantee highest information security standards.

Purpose

This document addresses all our IT-related security objectives. These are supported by corresponding measures. The document is a comprehensive guide for management and employees to understand our current information security measures as a whole. Its purpose is to inform about the current situation and oblige all individuals within the scope to comply to these standards. Within this document terms 'data' and 'information' will be used interchangeably. For definitions, please refer to chapter 7.

Scope

The contents of this policy are intended for all employees, part time workers, interns, contractors of LC Packaging International B.V., its affiliates and FIBC production sites.

1.3 What are your rights as a data subject?

Data subjects have the right to be informed of the existence and purpose of their personal data that is being processed. You are entitled to request LC Packaging International B.V. details regarding your personal data. LC Packaging International B.V. will then notify you whether or not it is processing your personal data and inform you about the processing(s) for which your personal data is used.

If it appears that the personal data LC Packaging International B.V. processes of you are not (completely) correct, you can request rectification. You can also ask LC Packaging International B.V. to delete your data. LC Packaging International B.V. will implement this request, unless there are compelling, e.g. legal, obstacles to doing so. LC Packaging International B.V. will inform you about whether or not a rectification or data erasure has been made. You always have the right, due to your specific situation, to object to the processing and to request LC Packaging International B.V. to restrict or discontinue the processing. If there are no compelling obstacles, for example legal obstacles, we will honour your request. LC Packaging International B.V. will notify you of its decision.

Policy objectives

LC Packaging International B.V. aims to:

- Comply with the General Data Protection Regulation and any other applicable local laws and regulations that address information security;
- Implement a robust and safe framework for information security operations to reduce the risk of damage, misuse, theft, loss or abuse, based on standards of ISO27001;
- Educate employees regarding our current measures on information security and increase awareness of its importance;
- Ensure appropriate data retention and protection within LC Packaging International B.V. operations;
- Protect all personal data and respond to incidents in a timely manner;
- Implement high standard software, which ensures information security and protection from external hazards;
- Ensure information is protected by physical controls.

Policy measures

LC Packaging International B.V. strives to achieve its information security objectives with the following measures. The measures were categorised under different themes for the ease of comprehension.

General

- LC Packaging International B.V. ensures structured data classification under different confidentiality levels to ensure it is protected from unauthorised access. Please refer to Data Access Control for more details.
- LC Packaging International B.V. ensures its data protection by making use of anonymisation and pseudonymisation. This guarantees that only the necessary information is transferred to the recipient. Moreover, we have guidelines regarding the correct method of data disposal. Please refer to Data Anonymisation and Disposal Guidelines for more details.
- LC Packaging International B.V. has a Privacy Statement, which details our general processes with regard to personal data handling. This involves an explanation of the data we process and store of website visitors and for what purpose. Please refer to the following link:
 - <https://lcpackaging.com/privacystatement>
- LC Packaging International B.V. has a Disclaimer, Cookies & Privacy Policy, which lays out our procedures regarding privacy, intellectual property and cookies. It details personal rights and procedures with regards to personal data collected from website visitors. Please refer to the following link:
 - <https://lcpackaging.com/disclaimer-cookies-privacy>
- LC Packaging International B.V. supports its core production sites such as Dutch Bangla Pack Ltd. with an additional Information Technology Policy, which is written in the local language and helps all employees and management protect sensitive data.

GDPR Compliance

On May 25, 2018, the GDPR (General Data Protection Regulation) entered into force which applies throughout the European Union (EU). The GDPR regulates the protection of personal data in all countries of the EU and the same rules apply in each Member State.

- LC Packaging International B.V. has a GDPR contact person and a GDPR team that can be contacted by anyone with questions about the policy and procedures;
- LC Packaging International B.V. has an overview of all parties that process personal data. This includes both internal and external parties (data processors);
- LC Packaging International B.V. ensures to have an overview of all personal data held by the company including but not limited to processing activity purpose and category. Please refer to section 12.3 of the HR Manual for an overview of purposes regarding collecting personal data;
- LC Packaging International B.V. makes use of a processing register, which is kept up to date by the HR Manager.
- LC Packaging International B.V. has privacy statements made for employees, website visitors, and applicants which explains the data that we process and store of employees and for what purpose;
- LC Packaging International B.V. ensures that all data incidents are reported without undue delay and handled effectively in line with the GDPR standards. Please refer to Data Breach Procedure for more details.

Data retention & access

- LC Packaging International B.V. clients that require processing of our personal data to provide us their services must gain our permission with personal data processing agreement before processing any personal data;
- LC Packaging International B.V. employees provide consent to our processing of their data by signing the employment contract which includes the HR manual where information on what we process and why is communicated;

- LC Packaging International B.V. has an overview of retention periods related to personal and business data. These retention periods are in line with General Data Protection Regulation. Please refer to Security Management for an overview of retention periods;
- LC Packaging International B.V. makes use of the Role System. It allows to assign different roles within the active directory to different employees. Consequently, employees are only able to access their job position related information;
- LC Packaging International B.V. ensures efficient personal data request handling in line with the GDPR standards. We provide a form with which data subjects can request their information. Please refer to Subject Access Request Procedure for more details;
- LC Packaging International B.V. supports its core production sites such as Dutch Bangla Pack Ltd. with an additional Procedure for Document and Record Control, which ensures that documents remain legible and are retained for their purpose.

Information security awareness & best practices

- LC Packaging International B.V. has an IT handbook within its HR manual. It addresses the code of conduct related to computer, network, e-mail, social media and internet usage for LC Packaging International B.V. employees. Please refer to section 13 of the HR Manual for network access and usage guidelines;
- LC Packaging International B.V. has created a training for its employees regarding information security, including information covered within the HR manual. It raises awareness of all current measures and highlights the importance of good IT practices. Please refer to Information Security Awareness Training for more details;

- LC Packaging International B.V. ensures that individuals are aware of their rights to their personal data. For website visitors, please refer to Disclaimer, Cookies and Privacy Policy (<https://lcpackaging.com/disclaimer-cookies-privacy>). For employees, please refer to 12.4 of the HR Manual;
- LC Packaging International B.V. educates its employees regarding password management within the organisation's operations. Please refer to Security Management for password guidelines.

Third-party management

- LC Packaging International B.V. ensures that all its data processors sign an agreement for processing data, see our Processor Agreements.

Information security software

- LC Packaging International B.V. obliges its employees to use Microsoft Authenticator App, if they can't use the app, a phone call or text message will be used as alternative. This ensures a two-step authentication for the linked account. It increases data protection and prevents undesired access.
- LC Packaging International B.V. makes use of Cisco Identity Services Engine, which is a network security product. It simplifies the identity management across diverse devices and enforces security by keeping unknown devices out.
- LC Packaging International B.V. makes use of Microsoft Intune, which increases cross-platform IT alignment and employs cutting edge information protection in Office 365.
- LC Packaging International B.V. makes use of two Cisco Firewalls (ASA-5525) which contain firepower and are maintained with Cisco Firesight, which blocks unwanted websites and prevent unauthorised access.
- LC Packaging International B.V. has installed on all LC windows devices virus scanner software, which guarantees end-point protection against malware, exploits and ransomware.
- LC Packaging International B.V. ensures that all Windows devices are scanned real time using the Windows Defender Antivirus software.

- LC Packaging International B.V. uses Windows 10 automatic monthly updates to make sure all Windows Devices are updated. For all mobile devices Intune is used, and for all programs within Windows the tool SCCM is used.
- LC Packaging International B.V. ensures data encryption with Microsoft Bitlocker encryption on all Windows devices.
- LC Packaging International B.V. ensures with Azure Active Directory Insights in access regarding the LC Packaging domain.
- LC Packaging International B.V. has a SLA with network supplier, Ask Roger, to ensure stability and security regarding the network.

Continuous controls

- LC Packaging International B.V. conducts periodic third-party information security audit controls such as the GDPR QuickCheck Report by Grant Thornton conducted in 2018.
- LC Packaging International B.V. conducts regular 'mystery hacks' to check employee compliance with the information security standards.
- LC Packaging International B.V. makes use of internal communication platform when specific information security risks are observed such as occurrences of phishing.
- LC Packaging International B.V. obliges its employees to reset their passwords on a six-monthly basis.
- LC Packaging International B.V. periodically checks its applications to prevent information security breaches. Please refer to IT Checklist for more information.

Physical protection

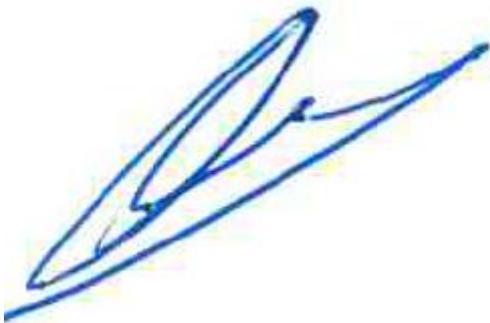
- LC Packaging International B.V. stores employee personal data in the personnel file, categorised per topic. It is stored in the HR office, in three places:
 - Digital personnel file on the F-drive;
 - Within office365 mailbox
 - Within personal Onedrive
 - Paper personnel file in the filing cabinet;
 - Documentation folders in the wall cabinet.
- LC Packaging International B.V. has a backups all office file data every night.
- LC Packaging International B.V. has a record of all its assets (physical and digital) in the TOPdesk system. This helps to create a comprehensive overview and allows efficient asset management.

Approval of policy

Name: Lucas Lammers, CEO LC Packaging

Date: 01 | 2019

Signature:

A handwritten signature in blue ink, appearing to be 'L. Lammers', written in a cursive style.