



Keter Privacy and Data Protection Policy and Notice

Last Updated: September 4, 2019

Keter Plastic Ltd, Keter UK Ltd, Keter US Inc, Curver Luxembourg Sarl and their affiliates (including wholly and partially owned subsidiaries) ("**Keter**", "**we**", "**our**" or the "**Company**", and their cognates) respects the privacy of its customers, employees and candidates, and is committed to protecting the personal information you share with us. We also protect the privacy of our website visitors, site visitors, followers, vendors, service providers, partners and others who come in contact with Keter (these and any others with respect to whom we collect personal data, shall collectively be referred to as "**Customers**" or "**you**" or "**Data Subjects**").

This Policy (the "**Privacy Policy**") explains the types of information we collect from you when you visit our physical stores, websites, including also at www.keter.com, www.curver.com and additional Keter group websites, our social media pages, or perform an online purchase on our online store, or you may provide us with such data in the course of your interest in our products, business transactions, conferences, sales and support, as well as in job applications, in the course of employment or provision of services. We are transparent about our practices regarding the information we may collect use, maintain and process and describe our practices in this policy and notice. This policy is also used as a public announcement to our data subjects regarding the collection of personal information and the manner in which it is used.

Please read the following carefully to understand our practices regarding your personal data and how we will process it.

For the purposes of EU's General Data Protection Regulation ("GDPR") and other applicable European Economic Area data protection law, (the "**Data Protection Law**"), Keter will usually be a data controller (the "**Controller**").

1. WHICH INFORMATION WE COLLECT?

There are several categories of information and data we collect from our Customers.

One type of Data is non-identifiable and anonymous information ("non-personal data"). We also collect several categories of personal data ("Personal Data"). Personal Data which is being gathered consists of any details which are personally identifiable provided consciously and voluntarily by you, or by an organization you represent or are associated with or through your use of the Keter website (as described below). This may include personal information, such as: your name (first and last), email address, phone numbers, picture, postal address, birthdate, gender, position and organization name, your bank account, credit card and other such payment and billing details, billing address, login credentials, your Keter account username and password and usage details, and other information you choose to provide to Keter.

Additionally, we may obtain location data related to the geographic location of your laptop, mobile device or other digital device on which the Keter website(s) is used.

You do not have any legal obligation to provide any information to Keter, however, we require certain information in order to perform contracts, such as sale or purchase, or to provide any services and

products. If you choose not to provide us with certain information, we may not be able to provide you with some or all of the services or fulfill your order for products.

Keter also collects the email addresses of people who communicate with Keter via email or via messenger services or other social media platforms or create accounts and login credentials.

By registering on Keter's website(s), or submitting requests for support or information via the website(s), Keter will collect details, including also your name, your company name, your phone number and the personal or company email you provided, your address, your birthdate and other such information. Keter uses this information to offer Keter's services and support, and will share this data across Keter group companies and affiliates to optimize its services.

You may create a Keter account on certain Keter websites. In some cases you may be able to access Keter services through login credentials of a designated third party website or service (each a "**Third Party Account**"), including but not limited to Google, LinkedIn, Facebook or Twitter. Doing so will enable you to link your Keter account and your Third-Party Account. If you choose this option, then you will be required to approve the connection as well as the provision of information (which may include Personal Information, such as your profile picture, gender, birthdate, headline, summary that appears in the profile, friends' lists, previous positions and organizations), that we obtain from your Third Party Account. Any data submitted to any Third-Party Account, even on and through Keter services, is managed directly by such third party and is not the responsibility of Keter.

Keter also collects Personal Data through the use of CCTV cameras and employee' site access cards. This consists of video images of you in the public spaces at Keter sites, as well as records of your entrances and exits of the Keter sites, buildings and office floors. It also includes identity verification systems and data. Keter may not be aware of the nature of the information collected through our services (for example, through our CCTV systems), and such information may include sensitive or special categories of Personal Data, but we do not knowingly collect such data about our Customers, members, site visitors etc.

Keter also collects data relating to employees. This is governed by a specific notice we have made available to our employees.

Keter also collects data relating to employment candidates. This includes CVs and the data contained therein, notes on meetings, standardized tests, reports, references, interviewer impressions and such industry standard data, as well as collecting data made publicly available or available to us on social networks. We collect such data based on the intention of the candidate to enter into an employment agreement with Keter.

2. HOW DO WE COLLECT PERSONAL DATA OF YOURS ON KETER FACILITIES AND SERVICES?

We collect Personal Data through your use of our websites. In other words, when you are using the websites, we are aware of it and will gather, collect and record the information relating to such usage, either independently or through the help of third-party services as detailed below. This may include technical information and behavioral information such as the User's Internet protocol (IP) address used to connect your computer to the Internet, your uniform resource locators (URL), operating system, type of browser, browser plug-in types and versions, screen resolution, Flash version, time zone setting, the User's 'clickstream' on the website, the period of time the User visited the website, methods used to browse away from a page, and any phone number used to call our customer service number. We likewise place cookies on your browsing devices through which you surf (see section 'Cookies' below).

We collect Personal Data required to provide services when you register interest, make an order and/or open an account. In addition, we collect your Personal Data, when you provide us such

information by entering it manually or automatically, or through your use of our websites, facilities and services, or in connection with site visits, in the course of preparing a contract, or otherwise in engaging with us. We also collect Personal Data through our CCTV recordings and through our card reader software, which automatically collect information about your presence in the Keter facilities.

3. WHAT ARE THE PURPOSES OF PERSONAL DATA WE COLLECT?

We will use Personal Data to provide and improve our services to our customers and others and meet our contractual, ethical and legal obligations, including for example:

- To enable us to meet our legal, contractual, ethical and business obligations as an employer and a potential employer for our employees and job applicants;
- Carrying out our obligations arising from any contracts entered into between you or your employer or organization and Keter and/or any contracts entered into with Keter and to provide you with the information, products and services that you request from Keter;
- Administering your account with Keter including to identify and authenticate you.
- Verifying and carry out financial transactions in relation to payments you make in connection with the products;
- Notifying you about changes to our service and products;
- Contacting you for the purpose of providing you with technical assistance and other related information about the products;
- Replying to your queries, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
- Contacting you to give you commercial and marketing information about events or promotions or additional services and products offered by Keter, including in other locations;
- Soliciting feedback in connection with your use of the services and the products purchased;
- Tracking use of Keter facilities and services to enable us to optimize them;
- Compliance and audit purposes, such as meeting our reporting obligations in our various jurisdictions, and for crime prevention and prosecution in so far as it relates to our staff, customers, facilities etc;
- If necessary, we will use personal data to enforce our terms, policies and legal agreements, to comply with court orders and warrants and assist law enforcement agencies as required by law, to collect debts, to prevent fraud, infringements, identity thefts and any other service misuse, and to take any action in any legal dispute and proceeding;
- For security purposes and to identify and authenticate your access to the parts of the facilities;
- We collect personal data of our clients' personnel which will be used for the purposes set out above;
- To detect and prevent damage to Keter, its employees and third parties.

4. SHARING DATA WITH THIRD PARTIES

We may transfer Personal Data to:

Members of our Group: This includes any member of our group, which means our subsidiaries - whether wholly or partially owned by Keter, in the EU, in Israel, in the US and elsewhere.

Third Parties. We transfer personal data to third parties in a variety of circumstances. We endeavor to ensure that these third parties use your information only to the extent necessary to perform their functions, and to have a contract in place with them to govern their processing on our behalf. These third parties include business partners, suppliers, affiliates, agents and/or sub-contractors for the performance of any contract we enter into with you. They may assist us in providing the products we offer, processing transactions, fulfilling requests for information, receiving and sending communications, analysing data, providing IT and other support services or in other tasks, from time

to time. These third parties may also include analytics and search engine providers that assist us in the improvement and optimisation of our website and our marketing.

We periodically add and remove third party providers. At present third party providers to whom we transfer personal data include also the following:

- Website analytics (such as Google Analytics);
- Document management and sharing services (such as Microsoft Sharepoint);
- Customer ticketing and support (such as Signature);
- On-site and cloud-based database services (such as EnterpriseDB);
- Vendor and customer Interface (such as Nipendo);
- Payroll and pension management systems and providers (such as Mercer, ADP, Absal, Synel, Hargall), and other HR management software;
- Time and attendance software (such as Adeco, Winsarp);
- CRM software (such as Aventeam);
- ERP software (such as Oracle, Dynamix AX);
- Visitors registration system;
- Project Management system;
- Web VC and meeting room platforms;
- Call center systems;
- Customer service providers for Keter products
- Recruiting and applicant management software and partners;
- Our lawyers, accountants, and other standard business software and partners.

In addition, we may disclose your personal data to third parties: if some or all of our companies or assets are acquired by a third party including by way of a merger, share acquisition, asset purchase or any similar transaction, in which case personal data may be one of the transferred assets. Likewise, we may transfer personal data to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal or audit or compliance obligation, in the course of any legal or regulatory proceeding or investigation, or in order to enforce or apply our terms and other agreements with you or with a third party; or to assert or protect the rights, property, or safety of Keter, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

For avoidance of doubt, Keter transfers and discloses non-personal data to third parties at its own discretion.

5. WHERE DO WE STORE YOUR DATA?

We keep Personal Data in servers which will be owned or controlled by the Keter in our various sites, or processed by third parties on behalf of Keter, by reputable cloud-service providers. Including in any and all Keter group locations, such as USA, Israel, UK, EU, Australia, Brazil and many more.

6. INTERNATIONAL DATA TRANSFERS

Personal Data may be transferred to, and stored and used at, a destination outside the European Economic Area (EEA) that may not be subject to data protection laws deemed adequate by the EU. Where your Data is transferred outside of the EEA, we will take all steps reasonably necessary to ensure that your Data is subject to appropriate safeguards, and that it is treated securely and in accordance with this privacy policy. Keter transfers data from its various locations and jurisdictions to other jurisdictions as follows:

- To Israel. Keter headquarters are based in Israel. Israel is considered by the European Commission to offer an adequate level of protection for the personal information of EU

Member State residents; we may transfer data to other countries with an adequacy ruling too; and

- To the United States of America and additional non-EU locations. Transfer to the US and elsewhere is done subject to the Privacy Shield, or subject to Standard Contractual Clauses, or some other mechanism valid under GDPR; and
- Within / to the EU.

We may transfer your personal data outside of the EEA, in order to:

- Store or backup the information;
- Enable us to provide you with the services and products and fulfill our contract with you;
- Fulfill any legal, audit, ethical or compliance obligations which require us to make that transfer;
- Facilitate the operation of our group businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights;
- Serve our customers across multiple jurisdictions;
- Operate parent company, subsidiaries and affiliates in an efficient and optimal manner;
- Detect and prevent damage to Keter, its employees and third parties.

7. DATA RETENTION

Keter will retain personal data it processes only for as long as required in our view, to provide the services and as necessary to comply with our legal and other obligations, to resolve disputes and to enforce agreements. We will also retain personal data to meet any audit, compliance and business best-practices.

Data that is no longer retained may be anonymized or deleted. Likewise, some metadata and statistical information concerning the use of our services are not subject to the deletion procedures in this policy and may be retained by Keter. We will not be able to identify you from this data. Some data may also be retained on our third-party service providers' servers until deleted in accordance with their privacy policy and their retention policy.

8. WEBSITE AND DATA COLLECTION AND COOKIES

When you access or use our website(s), Keter uses industry standard technologies such as cookies, pixels and similar technologies, which store certain information on your computer or browsing device and which will allow us to identify the computer or device from which you connect and in some cases to identify them with the user, and to enable automatic activation of certain features, and make your website experience more convenient and effortless. We use different types of cookies: some cookies are strictly necessary, they are required for the operation of our site(s) and under our terms with you; this includes for example, cookies that enable you to log into secure areas of our services. We also use analytical and performance monitoring cookies, which allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. Finally, we use functionality cookies which are used to recognise you when you return to our Site. This enables us to personalise content to your preferences, including for example, your choice of language or region.

Different cookies are kept for different periods. Session cookies are used to keep track of your activities online in a given browsing session; these cookies generally expire when the browser is closed but may be retained for a period on your device. Permanent cookies remain in operation even when you have closed the browser; they are used to remember your login details and password. Third-party cookies are installed by third parties with the aim of collecting certain information to research behaviour, demographics. Third party cookies on our site include, for example, Google Analytics. Likewise, pixels from Facebook and others enable integration of third party service providers (eg Twitter, Youtube, Pintrest, Instagram) are embedded on our site. Third party cookies will be retained

according to the terms of those third parties, and you can control those cookies in your browser settings.

We use cookies and other technologies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests of improving, optimizing and personalizing our services, and these are not overridden by your rights.

Most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you choose to block or erase cookies your online experience on our website(s) will be limited.

How to disable cookies: the effect of disabling cookies depends on which cookies you disable but, in general, the website and some services delivered through it may not operate properly, may not recognize your device, may not remember your preferences and so on, if cookies are disabled or removed. However, allowing or disabling cookies is your choice and in your control. If you want to disable cookies on our site, you need to change your browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies can be found here:

- Internet Explorer: <http://windows.microsoft.com/en-GB/internet-explorer/delete-manage-cookies>
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Safari: <http://help.apple.com/safari/mac/8.0/#/sfri11471>

Our websites may, from time to time, contain links to external sites. We are not responsible for the operation, privacy policies and practices or the content of such sites.

9. SECURITY AND STORAGE OF INFORMATION

We take great care in implementing, enforcing and maintaining the security of the personal data we process. Keter implements, enforces and maintains security measures, technologies and policies to prevent the unauthorized or accidental access to or destruction, loss, modification, use or disclosure of personal data. We likewise take steps to monitor compliance of such policies on an ongoing basis. Where we deem it necessary in light of the nature of the data in question and the risks to data subjects, we may encrypt data. Likewise, we take industry standard steps to ensure our websites are safe.

Note however, that no data security measures are perfect or impenetrable, and we cannot guarantee that unauthorized access, leaks, viruses and other data security breaches will never occur.

Within Keter, we endeavor to limit access to personal data to those of our personnel who: (i) require access in order for Keter to fulfil its obligations, including also under this Privacy Policy and its agreements, and (ii) have been appropriately and periodically trained on the requirements applicable to the processing, care and handling of the Personal Data, and (iii) are under confidentiality obligations as may be required under applicable law.

Keter shall act in accordance with its policies and with applicable law to promptly notify the relevant authorities and data subjects in the event that any personal data processed by Keter is lost, stolen, or where there has been any unauthorized access to it, all in accordance with applicable law and on the instructions of qualified authority. Keter shall promptly take reasonable remedial measures.

10. DATA SUBJECT RIGHTS

Data subjects with respect to whose data GDPR applies, have rights under GDPR and local laws, including, in different circumstances, rights to: data portability, access data, rectify data, object to processing, and erase data. It is clarified for the removal of doubt, that where personal data is provided by a customer being the data subject's employer, such data subject rights will have to be effected through that customer. In addition, data subject rights cannot be exercised in a manner inconsistent with the rights of Keter employees and staff, with Keter proprietary rights, and third party rights. As such, job references, reviews, internal notes and assessments, documents and notes including proprietary information or forms of intellectual property, cannot be accessed or erased or rectified. In addition, these rights may not be exercisable where they relate to data that is not in a structured form, for example emails, or where other exemptions apply. If processing occurs based on consent, data subjects may have a right to withdraw their consent.

If, for any reason, a data subject wishes to exercise these rights and modify, delete or retrieve their Personal Data, they may be able to do so by contacting Keter (privacy@keter.com). Note that Keter has to undertake a process to identify a data subject exercising their rights. Keter may keep details of such rights exercised for its own compliance and audit requirements. Please note that Personal Data may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Data, depending on technical commercial capability. Such information may continue to be used by Keter.

Data subjects in the EU have the right to lodge a complaint, with a data protection supervisory authority in the place of their habitual residence. Our lead supervisory authority is the National Commission for Data Protection ('CNPD') of the Grand Duchy of Luxembourg (complaints may be lodged at <https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html>). If the supervisory authority fails to deal with a complaint you may have the right to an effective judicial remedy.

11. YOUR CALIFORNIA PRIVACY RIGHTS

If you are a California resident, California Civil Code Section 1798.83 permits you to request in writing a list of the categories of personally identifiable information relating to third parties to which we have disclosed certain categories of personally identifiable information during the preceding year, for the third parties' direct marketing purposes, and to obtain such information free of charge up to twice in a 12-month period. You have the right to request disclosure from Keter of the following:

- a. The categories of personal information Keter has collected about you;
- b. The categories of sources from which the personal information is collected;
- c. The business or commercial purpose for collecting personal information;
- d. The categories of third parties with whom the business shares personal information; and
- e. The specific pieces of personal information Keter has collected about you.

To make any such requests, please contact us at: privacy@keter.com or call the toll-free phone number: 877-638-7056

Keter will not discriminate against a consumer because the consumer exercised any of the consumer's rights, including, but not limited to, by:

- a. Denying goods or services to the consumer.
- b. Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- c. Providing a different level or quality of goods or services to the consumer.
- d. Suggesting that the consumer will receive a different price or rate for goods or services or a different level or quality of goods or services.

12. GENERAL

Minors. We do not knowingly collect or solicit information or data from children age 16 or under or knowingly allow children age 16 or under to register for Keter services. If you are age 16 or under, do not register or attempt to register for any of the Keter Service or send any information about yourself to us. If we learn that we have collected or have been sent Personal Data or from a child age 16 or under, we will delete that Personal Data as soon as reasonably practicable without any liability to Keter. If you believe that we might have collected or been sent information from a minor age 16 or under, please contact us at: privacy@Keter.com, as soon as possible.

Do Not Sell Personal Information. Keter does not sell any data subjects' personal information.

Changes to this Privacy Policy. The terms of this Privacy Policy will govern the use of the services, and websites, and any information collected in connection with them. Keter may amend or update this Privacy Policy from time to time. The most current version of this Privacy Policy will be available at: <https://www.Keter.com/privacy/>. We will endeavor to provide notice of material changes to this policy on the homepage of the website or by other means during a period of thirty (30) days from such change. Material changes will take effect seven (7) days after such notice was provided. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date and your continued use of our services will constitute your active acceptance of, and agreement to be bound by, the changes to the Privacy Policy.

Translation. This Privacy Policy may be translated into many different languages for your convenience as a part of our transparency regarding our data practices. Mistranslations, or delays in translation and amendment of our policy as a result of the need for translation, may occur.

Keter aims to process only adequate, accurate and relevant data limited to the needs and purposes for which it is gathered. It also aims to store data for the time period necessary to fulfill the purpose for which the data is gathered. Keter only collects data in connection with a specific legitimate purpose and only processes data in accordance with this Privacy Policy. Our policies and practices are constantly evolving and improving, and we invite any suggestions for improvements, questions or comments concerning this Data Protection and Privacy Policy and Notice, you are welcome to contact us (details below) and we will make an effort to reply within a reasonable timeframe.

Keter and Keter's Data Protection Officer contact details: Keter Plastic Ltd., 1 Sapir Street Herzliya, Israel privacy@keter.com.

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