

## Privacy Position

### Purpose

The following information is intended to inform our customers, business partners, and stakeholders on the policies and practices concerning how Atlantic manages personal information responsibly.

“**Personal information**” is information that identifies you as an individual. For example: First and Last Name, Personal Email Address, Personal Phone Number, Photograph.

As a manufacturing enterprise serving business customers, limited personal information may be shared with us in building business relationships (eg. names of an individual business contact, cell phone numbers which may be used for both business and personal use). As an employer, we do collect, store and handle personal information of our personnel for purposes linked to employment and benefits administration. Employee personal information may be shared with other organizations such as unions and insurance entities for the purposes of serving our role as the employer and as required by policy or regulation.

### Position

Personal information management practices are viewed as essential for Atlantic’s commitment to serving our customers as a reliable and trusted business partner.

Atlantic’s position is intended to serve the privacy principle of “openness”, with a clear and easy to understand description of the Atlantic’s responsibilities and commitment to data privacy and personal information management. Our responsibilities include:

- Obtaining meaningful **consent** to collect, store and use personal information
- **Training** front-line personnel on procedures for **responding** to an individual’s inquiries about their personal information
- Providing the following **information**, in easy-to-understand terms:
  - a) Information on policies, standards or codes
  - b) Information on how an individual can gain access to their personal information
  - c) Contact information where requests to access personal information should be sent
  - d) Contact information of the accountable officer for the Company’s policies and practices concerning data privacy and personal information management
  - e) Information on how an individual can raise a concern
  - f) Information of what personal information may be disclosed to other organizations, including subsidiaries and any Third Party, and why

As a trusted business partner, Atlantic has an **Information Classification** Policy and management system to classify and handle confidential information with care. We respect personal information as confidential and apply safeguarding practices.

Our corporate governance policies are based on the tenets of accountability and responsibility and are grounded on principles of ethical business conduct and compliance with relevant laws and regulations. Atlantic has a well-established **Code of Conduct and Whistleblower Policy** with governance to uphold ethical business conduct and foster our culture of respect and integrity. ‘The Code’ defines our Core Values and includes information on the Whistleblower reporting process to raise concerns without retaliation.

Atlantic also has a **Privacy Policy** that sets direction for “fair information practices” based on guiding principles of integrity, respect and fairness for secure collection, use and storage of personal information for business purposes. This includes the principle to restrict the collection, use, and sharing of personal information to that which is necessary for the company to do business.

For more on how an individual can gain access to their personal information, **requests to access personal information** should be sent through the following communication channels:

**Email:** [privacy@atlantic.ca](mailto:privacy@atlantic.ca)

Our General Inquiries toll free number is 1-800-268-5620 - for privacy-related calls please convey this is privacy-related or a ‘request to access Personal Information’

The same contact information above can be used to raise a concern. Employees also have access to the Whistleblower Hotline, with the full reporting process outlined in the Code of Conduct and Whistleblower Policy, which is regularly reviewed and subject to annual training campaigns.

The contact information of the accountable officer for the Company’s policies and practices concerning privacy compliance is:

**Chief Privacy Officer**

Heather Fedash

[heather\\_fedash@atlantic.ca](mailto:heather_fedash@atlantic.ca)

As your trusted business partner, we will continue to apply our Core Values that underpin our Code of Conduct and culture of integrity at Atlantic.



Ethical business practices are viewed as essential for Atlantic’s commitment to serving our customers as a reliable and trusted business partner.

**Document Information**

Version	Effective	Details
Version 2024 (Atlantic Packaging Products Ltd.)	September, 2024	Manage as a Controlled Document. Available to provide to customers/external stakeholders to respond to inquiries, RFIs, or other external assessment. Reference: <a href="https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/p_principle/principles/p_openness/">https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/p_principle/principles/p_openness/</a>