

Privacy Policy – Retirees & Beneficiaries

1. **Introduction:** This Privacy Policy – Retirees & Beneficiaries provides additional information that is specific to the use of the websites and systems the Company operates (collectively referred to as the “Site”) as it relates to retirement benefits and process. The Privacy Policy – Retirees & Beneficiaries hereby incorporates the Privacy Policy – General by reference. To the extent that the Privacy Policy – General and the Privacy Policy – Retirees & Beneficiaries conflict, the Privacy Policy – Retirees & Beneficiaries supersedes the Privacy Policy – General only as it applies your use of the Site as a retiree.

2. **Who is processing my data?** Ball Corporation and its subsidiaries and affiliates process certain types of personal data from retirees for purposes of retirement benefits administration. Ball Benefits Central, administrated with Willis Towers Watson, and Rexam Pension Trustees Limited also processes certain types of personal data from retirees for purposes of retirement benefits administration. The Company may also contract with third parties to provide certain services on behalf of the Company, including performing ministerial, benefit payment administration, benefit auditing, and other retirement benefits functions. Ball takes steps to ensure that the third parties processing data on Ball’s behalf comply with data protection standards, including but not limited to, entering into contracts with the third parties, conducting security reviews of the third parties, and other similar efforts and processes.

3. **On what basis is my data being collected?** In addition to the information described in the Privacy Policy – General, Section 4, the Company may use the following additional bases for processing data relating to retirees:
 - a. **Legal Obligations:** Ball is required to collect certain information to comply with government requirements such as taxation purposes, government reporting requirements, financial regulatory compliance required of publicly traded companies, responding to valid government orders requesting information, and other similar types of legal obligations.
 - b. **Necessary to Fulfill a Contract:** Ball collects and processes data in order to comply with its obligations under employment contracts, plan documents, and other retirement benefit legal requirements. This includes the obligation to pay retiree applicable retirement and related benefits. This may include collecting information relating to the retiree’s beneficiaries, employment history, health, finances, and other types of personal data and sensitive personal data.
 - c. **Legitimate Business Reasons:** Ball also processes data for legitimate business reasons, including complying with fiduciary obligations relating to pension funding, administration, and operation of retirement plans such as identifying efficiencies in the administration of, or mitigating financial risks to retirement plans.
 - d. **Retiree Consent:** In very limited circumstances, Ball may collect retiree data based on the retiree’s consent. This may include obtaining more detailed financial, personal, health, and other personal and sensitive personal information during offers of enhanced transfer values and other similar benefit-related exercises that may be offered from time to time. Retirees providing

voluntary consent may withdraw their consent at any time by contacting the applicable Company data protection office as set out in the Privacy Policy – General [here](#).

e. Legal Defense: In certain circumstances your personal data will be processed as part of a legal defense.

4. **What data is the Company Processing?** In addition to the information described in the Privacy Policy – General, Section 5, the Company may use the following additional information as it relates to applicants:

a. Form Submissions: Ball uses all information provided through your submissions to determine your eligibility and qualifications for the retirement benefits for which you have applied. Ball may also use this information to contact you to obtain more information, seek clarification based on the information you have provided, or other purposes related to a retiree's eligibility for, qualification for, or administration of retirement benefits.

b. Retiree Personal Data: Personal data and sensitive personal data is used by Ball and applicable third parties to administer retirement benefits. This personal information may include a retiree's name, contact information, employment history, financial information, family information, beneficiary information, beneficiary contact information, health information, and other information necessary to administer applicable retirement plans for the benefit of the retiree and the retiree's beneficiaries.

5. **Are you sharing my personal data?** In addition to the information described in the Privacy Policy – General, Section 6, the Company may provide personal data and sensitive personal data to the following recipients:

a. Internal Recipients: Personal data processed by Ball is limited to departments and employees who have a "need to know" your personal data in order to fulfill their business and legal obligations (see Paragraph 3). Departments that are likely to process retiree personal data include human resources, pensions, compensation and benefits, and the law department. Other departments may obtain access to your information for specific limited reasons directly related to your employment on a need to know basis.

b. External Recipients: Certain types of data may also be transferred to third party processors. Retiree personal data may be transferred to the following types of third-party processors on a need to know basis when legally required, necessary to fulfill the Company's obligations in the employment relationship, or to fulfill business obligations further to your retirement:

- i. Third party administrators for retirement plans;
- ii. Third party auditors;
- iii. Third party financial advisors; and
- iv. Governmental bodies/regulators or labour authorities.

c. Other Unique Circumstances: It is also possible in rare circumstances that your information may be shared in connection with, or during negotiations of, any merger, sale of

company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company. Ball may also share retiree information to a competent authority if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation, or legal process. This may include law enforcement officials, government authority, or other third parties as may be deemed necessary to comply with legal processes or meet national security requirements. Your information may also be shared in the event of litigation to defend the rights, property, or safety of the Company, its business partners, you, or others.

d. ***Non-Personal Data***: Retiree and retiree beneficiary information may be shared when it has been aggregated, anonymized, and or de-identified so that it cannot reasonably be used to identify you.

6. **Will my data be transferred to different countries?** Ball is a global organization headquartered in the United States of America with offices in many countries throughout the world. As a result, Ball may transfer your personal data to Ball in the United States of America, to any Ball subsidiary worldwide, or to third parties and business partners as we have described in this Privacy Policy.

Ball Corporation has taken steps to provide adequate organizational and technical safeguards to protect your personal data, including by certifying under the EU-US and Swiss-US Privacy Shield programs, as well as entering into appropriate agreements with Ball entities and external organizations. You may review more information about Ball's EU-US and Swiss-US Privacy Shield certifications by clicking [here](#).

7. **What if I click on a link to another website that isn't administered by Ball?** This Site may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

8. **What happens if I refuse to provide my personal data?** In addition to the information described in the Privacy Policy – General, Section 12, refusing to provide the required personal data and sensitive personal data may result in the termination of benefits, incorrect administration of benefits, or other similar issues.

9. **What websites does this notice apply to?** In addition to the information described in the Privacy Policy – General, Section 13, this notice applies to www.ballbenefitscentral.ehr.com, www.rexampensionplan.co.uk, and others websites that may be added in the future.