

[GLOBAL]
NOTICE OF DATA COLLECTION, PROCESSING AND TRANSFER
FOR EMPLOYEE ENGAGEMENT SURVEYS

Ball Corporation (the “Company”) and its operating groups, subsidiaries and affiliates (“Ball”, “we” or “us”) —including the corporate group member that is your employer — strive to deliver a world-class work experience. From time to time, Ball will conduct employee engagement surveys (“Survey”) to help us improve employee engagement and retention. Ball Corporation, on behalf of itself, and, if different, the corporate group member that is your employer, has retained WTW, Qualtrics, and other vendors (the “Survey Provider”), Ball’s third-party employee engagement consultant, to distribute and administer the Survey. Ball Corporation and, if different, the corporate group member that is your employer are the joint controllers of the Survey results. You can find your employer’s contact details here [<https://ballconnect.ball.com/home>].

We are committed to transparency and want to help you understand our practices surrounding the collection, use, disclosure, international transfer, and other Processing of the Personal Data you voluntarily provide when responding to the Survey.

This Notice of Data Collection, Processing and Transfer (“**Engagement Survey Notice**” or “**Notice**”) addresses the following topics about the administration of the Survey and the Processing of your Personal Data:

- Collection, Use and Disclosure
- International Transfers of Your Personal Data
- Legal Basis for Processing
- Retention
- Additional Information

For purposes of this Notice,

- “**Personal Data**” means any information concerning an identified or identifiable individual.
- “**Processing**” means any operation with respect to Personal Data, such as collection, retrieval, access, use, disclosure, storage or disposal of Personal Data.

Scope

This Notice applies only to Personal Data Processed for purposes of conducting the Survey. Additional information about how the Company and the other members of the Ball corporate group Process your Personal Data is detailed for employees in the Privacy Policy - Employees [[insert hyperlink to Privacy-Policy-Employees.pdf \(ball.com\)](#)].

Collection, Use, and Disclosure

Collection: The Survey is brief and voluntary. **Whether you choose to complete the voluntary Survey, or decline to do so, will have no effect on the terms and conditions of your employment.** The purpose of the Survey is to help Ball Corporation and your employer, if different, improve employee engagement and retain talent. If you choose to proceed with the Survey, you will be asked to answer a series of questions. None of the questions are mandatory, and you can choose which ones to answer or not. For open-ended questions, your comments will be reported exactly as written, so please do not sign your name or include the names of other individuals. Note that this Survey is not intended for reporting individual concerns requiring

personal follow-up. For those matters, please contact your Human Resources representative or the Compliance Alliance.

The Survey Provider will collect the following Personal Data, to the extent you choose to provide the information:

- **Demographic Details**, including Age Group, Gender and Ethnicity;
- **Work details**, including Organization Level, Job Function, Department, Class, Level/Grade, Work Location, Supervisor and Hierarchy, Tenure, and Employment Status.
- **Your opinions and rankings** with regards to your personal experience with Ball's workplace environment, corporate culture and your level of satisfaction.
- **Open-ended feedback** as to the reason(s) you continue to work for your employer and any reasons that would prompt you to leave.

We ask that you **do not** provide your name or include the names of other individuals in your Survey response, except where indicated (e.g., supervisor's name).

Purpose of Use and Disclosure:

The Survey Provider will collect the personal information submitted with your Survey response. The Survey Provider is an independent consultancy that will analyze the results and report them as statistical summaries based on groups of at least 10 respondents to maintain confidentiality. The Survey Provider will not report individual Survey responses to Ball and will not provide the raw data file to Ball, guaranteeing that your responses to the Survey will remain confidential.

Ball will use the statistical summaries to evaluate and improve employee satisfaction. Ball will not disclose the statistical summaries to any third party outside the Ball corporate group unless legally required to do so.

No Sale or Sharing

Ball does not sell or share your Personal Data where "share" means disclosing personal data to third parties for cross-context behavioral advertising.

International Transfers of Your Personal Data

Transfer to Survey Provider: The Survey Provider may store your Personal Data in the United States and onward transfer Personal Data to countries other than where you reside as may be necessary to prepare the statistical summaries. The Survey Provider is under written contract with Ball and performs its services subject to Ball's instructions. For employees who reside in the European Economic Area ("**EEA**"), Switzerland, or the United Kingdom, Ball and the Survey Provider have agreed to use standard contract clauses approved by the competent supervisory authority to ensure an adequate level of protection for Personal Data transferred to third countries, such as the United States. You can obtain a copy of any relevant provisions by submitting a request to [**insert appropriate e-mail address**].

Transfer within the Ball Corporate Group: Ball will share the statistical summaries within the corporate group with employees with a business need to access the statistical summaries. These other Ball corporate group members may be located in countries other than where you reside that have standards for the protection of Personal Data that differ from those in your country of residence. A list of the countries where these other Ball corporate group members are located

can be found here:

- Data Protection North America Critical Data Protection Team 9200 W 108th Cir., Westminster, CO 80021 cdpgov@ball.com
- Data Protection Europe, Middle East, & Africa Critical Data Protection Team 100 Capability Green Luton LU1 3LG United Kingdom cdpeu@ball.com
- Data Protection South America Critical Data Protection Team Avenida das Américas 3434- Condomínio Mario Henrique Simonsen Bloco 2/6 e 7 andares Barra da Tujica Rio de Janeiro 22640-102 Brasil cdpsa@ball.com

Legal Basis for Processing

The Processing of your Personal Data as described above is necessary for Ball to pursue our legitimate interests in conducting processing activities related to improving employee engagement, retaining talent, and creating a positive work environment.

Where necessary, Ball will rely on your consent. By selecting “Yes” from the drop-down box in Question 1, you consent to the processing of your Personal Data by the Survey Provider, on behalf of Ball, Processing, for the Survey as described in this Notice, including the collection of any sensitive personal information (e.g., ethnicity) and international transfer. Your consent will continue to apply to the collection, use, disclosure, international transfer, and other Processing of your Personal Data unless you withdraw your consent by contacting us at [compliancealliance@ball.com]. ***Please remember that the Survey is voluntary.***

Retention

Ball will retain the statistical reports for 5 years unless applicable law requires a longer or shorter retention period.

No Automated Decision Making:

No member of the Ball corporate group will make any decisions concerning the results of the Survey by automated means.

Additional Information

You can find additional information about the following topics in the Privacy Policy - Employees [[Privacy-Policy-Employees.pdf \(ball.com\)](#)]:

- Your rights with respect to your Personal Data
- Security of your Personal Data
- Contact information for any applicable data protection officer or person in charge