

QUAD ETHICS & COMPLIANCE HOTLINE PRIVACY STATEMENT

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Introduction

This Ethics & Compliance Hotline Privacy Statement (“**Privacy Statement**”) applies to anyone using the Quad Ethics & Compliance Hotline (**the “Hotline”**), including anyone who makes a report by phone or online. Quad is committed to protecting the privacy and security of your personal data. Please read this statement carefully to understand our practices regarding how your personal data is collected and processed through the Hotline.

The Hotline is for individuals to report possible instances of illegal and improper conduct, broadly covering areas including: accounting, billing or financial controls; antitrust and anti-competitive conduct; data, privacy or confidential breaches; conflicts of interest; discrimination, harassment or mobbing; falsification or manipulation of company records; bribery, kickbacks or improper gifts; political contributions; fraud or money laundering; inside trading or other securities violations; theft or misappropriation; copyright infringement, intellectual property issues or software piracy; import/export violations; improper environmental, health or safety practices; or retaliation.

Quad/Graphics, Inc. (“**Quad**”, “**we**”, “**our**”, “**us**”) administers the Hotline for itself and on behalf of its worldwide subsidiaries and affiliates, including Quad/Graphics Europe Sp. z o.o. or Marin’s International. You can find out more about all of the Quad entities worldwide by visiting www.quad.com.

The use of the Hotline is entirely voluntary. You can also report your concerns to any manager or any member of Quad’s Human Resources, Compliance or Legal departments. Quad strictly prohibits any retaliation for making a report through the Hotline.

If you do make a voluntary report using the Hotline, Quad/Graphics, Inc., N61 W23044 Harry’s Way Sussex, WI 53089-3995 United States, 1-414-566-2056 will be the controller of any of your personal data that is collected through the report. Quad uses independent third party, NAVEX, whose headquarters in Oregon, USA, to operate the Hotline, including the system and servers on which reports are stored. [NAVEX’s privacy statement](#) explains their data handling practices

INFORMATION COLLECTED FROM YOU

We may collect and process the following data about you:

- Information that you provide in your report to the Hotline, whether by phone or online, including your name, email address, phone number, your relationship with Quad (*e.g.*, whether you are an employee, contractor, vendor, supplier or other), unless you report anonymously, and any other personal data you disclose within your report, including the circumstances of the incident and personal data of the persons you name in your report.
- Employee information, including your Quad identification number, work contact information and a record of your correspondence with NAVEX and/or Quad.
- Your location and/or office of work, unless you report anonymously.
- Details of your visits to the program’s website including traffic data, location data, IP addresses and other communications data, and the resources that you access.

Sensitive Information: Some information you provide may include what some countries refer to as ‘special category personal data’, such as medical information (including occupational health requirements, accident reports, drug and alcohol test results) and information which may reveal race or ethnicity, sexual orientation or gender identity, religious or philosophical beliefs, trade union membership, and information relating to actual or suspected criminal convictions and offences (collectively, “**Sensitive Information**”). In the People’s Republic of China, Sensitive Information also includes private telephone numbers, financial information, email addresses and identity information. We will process Sensitive Information only when necessary and permitted to do so by law, on the basis outlined in this Privacy Statement.

IP ADDRESSES AND COOKIES

NAVEX may collect information about your access to the webpage, including, where available, your IP address, operating system and browser type for system administration purposes and to report aggregate information to NAVEX

and service providers for NAVEX. NAVEX may obtain information about your general internet use by using a cookie file which is stored on the hard drive of the computer you are using. Cookies contain information that is transferred to your computer's hard drive. They help improve the system and to deliver a better and more personalized service. You can find out more about this type of technology through your internet browser.

For example:

- If you use Internet Explorer click 'Help' on the toolbar then search on 'Cookies' in the box which appears
- If you use Safari click 'Safari' then 'Preferences' then 'Security'. You can then click 'Help' to learn more about cookies and the options your browser gives you.
- If you use Mozilla Firefox you can find out more here - <http://support.mozilla.com/en-US/kb/Enabling+and+disabling+cookies>

NAVEX's privacy statement tells you more about how it uses cookie technology and how it stores data. You may refuse to accept cookies by changing the settings on your browser. However, if you change the settings to refuse cookies you may be unable to access certain parts of the site. Unless you have adjusted your browser settings so that the browser refuses cookies, the system will issue cookies when you log on to the Hotline and website. The system may also use web beacons which are similar but not identical to cookies in the way they operate.

USES MADE OF THE INFORMATION

We use information provided or held about you in NAVEX's Hotline system in the following ways:

- to investigate any incident reported to us;
- to make any necessary reports to third parties, such as regulators or law enforcement;
- to support any criminal investigation into the conduct of the company, our employees or third parties;
- to support disciplinary or other proceedings against individuals breaching our Code of Conduct, breaking the law or interfering with our legal or contractual rights.

These uses may necessitate disclosure or transfers of information you provided or held about you to different jurisdictions and Quad subsidiaries and affiliates, as necessary.

LAWFUL BASIS FOR PROCESSING THIS INFORMATION

For EU and UK data subjects, we include the following lawful basis for each of our processing activities covered by the GDPR:

- consent: in some jurisdictions, we may rely primarily on consent to process your personal data;
- compliance with a legal obligation: in many countries, there is a legal obligation to take steps to prevent ethical violations, or to support criminal investigations into conduct of the company, our employees and/or third parties that makes it necessary for us to process your personal data; or
- if there is no explicit legal obligation to process your data, where our processing is necessary in our legitimate interests to investigate, prevent and appropriately handle ethical violations.

Depending on the nature and content of a report, we may be required to process Sensitive Information. We are required to process this with more care in accordance with applicable data protection laws, and those laws may require a different or additional legal basis for that processing, which may vary depending on the country in which you work. Where applicable, our lawful basis for this processing of Sensitive Information is with your explicit consent, where that is required, and/or that it is necessary for:

- the purposes of carrying out your or our obligations, or exercising your or our specific rights, in the field of employment, social security and/or social protection law, as permitted by law;
- reasons of substantial public interest (*e.g.*, equality of opportunity or treatment);
- the establishment, exercise or defense of legal claims;
- the purposes of occupational medicine; or
- a reason for which such processing is permitted expressly by law;

DISCLOSURE OF YOUR INFORMATION

NAVEX will send your report to the specific individuals on the Compliance team who manage the investigation of Hotline reports. Details from your report may be shared on a need-to-know basis with Quad subsidiaries and affiliates across the world to properly investigate and follow up on reports. The personal data you provide may be processed and/or accessed on a need-to-know basis by individuals in different Quad departments, such as Compliance, Legal,

Human Resources, Finance, Information Technology, Operations and/or Security. Those individuals may be located in the United States or elsewhere (see “Where We Store Your Personal Data” below for more information).

In some circumstances we will need to share the information with other parties (e.g., if we investigate an employee for misconduct, we may need to share sufficient information with that employee to enable them to tell us their version of events). Your personal data and the information you provide may also be disclosed as required by local authorities. We will take care to ensure that we use any information you give us proportionally and that we hold a valid lawful basis for any disclosure.

FOR CALIFORNIA RESIDENTS

The personal information about you that we may collect based on a report may include information in the below categories of data, which are defined by California state law. Inclusion of a category in the list below indicates only that we may collect some information within that category. It does not necessarily mean that we collect all information listed in a particular category in all instances. We do not sell your personal information, nor have we done so in the past 12 months.

Category	Source	Purpose of Collecting Information
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers	This information is collected directly from you, NAVEX and/or through the use of cookies and similar technologies.	This data is processed to complete our investigations and to provide you with updates, where necessary and appropriate
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.	This information is collected directly from you, NAVEX and/or through the use of cookies and similar technologies	This information may be collected and processed by NAVEX for data analytics
Professional or employment-related information	This information is collected directly from you or NAVEX	This data is processed as part our investigation, where relevant

WHERE WE STORE YOUR PERSONAL DATA

As NAVEX is headquartered in the United States, the data that we collect from you will be transferred to, and stored at, differing locations that are primarily NAVEX’s servers in the United States. If you are making a report from the EU or UK, your personal data will likely be transferred outside of the European Economic Area (EEA) and/or the UK. Your personal data will also be processed by Quad employees and NAVEX operating outside of the EEA and the UK in the United States. By submitting your personal data, you understand that this transfer, storing and processing will occur. Quad has adequate safeguards in place, including Standard Contractual Clauses, for these data transfers to outside the EEA and/or the UK. We take appropriate steps to ensure that your data is treated securely and in accordance with this privacy statement.

SECURITY

Where you have chosen a password that enables you to follow up on your report, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. The transmission of information via the

internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data and any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorized access.

HOW LONG WE WILL RETAIN YOUR DATA

If you report from the EU or UK, the personal data you provide will be kept as long as necessary to process your report and investigate it. Typically, we will delete your personal data within two months of completion of the investigation of the facts alleged in the report. Where we need to take follow-up actions, including corrective action or to meet legal or financial requirements, your personal data will be kept until the conclusion of those actions, as well as any period allowed for an appeal or further follow-up process. Quad and its subsidiaries and affiliates will delete personal data about you at your request, where such request conforms to the relevant legal requirements and is not otherwise limited, and in any case, upon expiration of the maximum retention period set forth by applicable law.

ACCESS AND CORRECTION OF INFORMATION

We can provide to you details of the information we hold about you at any time. You can access and correct much of the personal data the system holds on you by accessing your own report using the [‘Follow up on a Report’ function the Hotline website](#).

OTHER RIGHTS RELATED TO PERSONAL DATA

Depending on where you live, your current jurisdiction and applicable data protection laws, and subject to any relevant restrictions or exemptions, you may be entitled to certain rights with regard to our processing of your personal data. **Please note:** depending on the country you live in and the applicable data protection laws, you may only have access to some of the rights listed below.

You may review or request certain corrections to the personal data we store about you. You may also request the erasure of personal data about you or object to its processing. In addition, you may request a copy of personal data you provided as part of your report, as long as providing you a copy does not violate the right of others.

In limited circumstances, you may have data portability rights in relation to certain personal data we hold about you. These rights are not unlimited and the exercise of these rights, and the limits upon them, are briefly set out below.

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent, we will stop processing your personal data for that purpose, unless there is another lawful basis we need to rely on, in which case, we will let you know. Your withdrawal of your consent will not impact any of our processing up to that point.

Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. Please note however, that applicable law may not permit us to honor your request for erasure or your objection. If you do object, we will need to show a compelling reason why our processing should continue that overrides your interests or rights; that the processing is necessary for us to establish, exercise or defend a legal claim; or we have consent from you for such processing.

If you wish to exercise any of your rights, please submit your request at www.quad.com/submit-a-privacy-request/ in the first instance. You may also write to us at Quad/Graphics Inc., Attn: Compliance Department, N61 W23044 Harry's Way, Sussex, Wisconsin 53089-3995, United States of America.

In some countries, should you continue to have unanswered concerns, you also have the right to contact the relevant data protection authority with your concerns. However, before doing so, we request that you contact us directly in order to give us an opportunity to work directly with you to resolve any concerns about your privacy. If you are located in the EU, [you can find your relevant authority here](#). If you are in the UK, you have the right to complain to the [Information Commissioner's Office](#).

Please note that under California law, we are only obligated to respond to personal information access requests from the same consumer up to two times in a 12-month period.

Before providing information that you request in accordance with certain of these rights, we must be able to verify your identity. To verify your identity, you may need to submit information about yourself, including, to the extent

applicable, providing answers to security questions, your name, government identification number, date of birth, contact information, or other personal identifying information. We will match this information against information we have previously collected about you to verify your identity and your request. If we are unable to verify your identity as part of your request, we will not be able to satisfy your request. We are not obligated to collect additional information in order to enable you to verify your identity. For deletion requests, you will be required to submit a verifiable request for deletion.

If you would like to appoint an authorized agent to make a request on your behalf, you must provide the agent with written, signed permission to submit privacy right requests on your behalf, or provide a letter from your attorney. The agent or attorney must provide this authorization at the time of request. We may require you to verify your identity with us directly before we provide any requested information to your approved agent. Information collected for purposes of verifying your request will only be used for verification.

If you chose to exercise any of these rights, to the extent that they apply, U.S. state laws prohibit discrimination against you on the basis of choosing to exercise your privacy rights.

Under certain circumstances, by law you may have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason or legal obligation for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

CHILDREN UNDER THE AGE OF 17

The Hotline is not intended for children under 17 years of age. No one under age 17 may provide any information to the Hotline. We do not knowingly collect personal data from or about children under 17 and do not sell personal data about children under 17. If you are under 17, do not use or provide any information on the Hotline or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal data from a child under 17 without verification of parental consent, we will delete that information. If you believe we might have any information from a child under 17, please contact us in any manner set forth below in the Contact section.

CHANGES TO THIS PRIVACY STATEMENT

Any changes we may make to this Privacy Statement in the future will be posted on this page. This information may be expanded or updated as we change or develop the Hotline. For this reason, we recommend that you review this Privacy Statement from time-to-time to see if anything has changed.

CONTACT

If you have any questions, concerns, complaints or suggestions regarding our Privacy Statement or otherwise need to contact us, please contact Quad's Chief Privacy Officer Dana Gruen at compliancedept@qg.com.