

Privacy Policy

This Privacy Policy describes how **thyssenkrupp Materials Trading NA, LLC** (“we,” “us,” or “our”) collects, uses, shares, and protects personal information. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions.

By using our website or otherwise providing information to us, you consent to our collection, use, and disclosure of your information in accordance with this Privacy Policy. If you do not consent to such collection, use, and disclosure, you must discontinue your use of our website and mobile applications.

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Information We Collect

We collect information about you in a variety of ways depending on how you interact with us and our website, products, and services, including:

- Directly from you when you provide it to us, such as when you request a quote, sign up to receive communications from us, place an order/make a purchase, or contact us by phone, email, or otherwise.
- Automatically through the use of cookies, server logs, and other similar technologies when you interact with our website, advertisements, emails, or otherwise.
- From other sources, including, for example, our affiliates, business partners, online social media networks, financial institutions (e.g., your bank or credit card company), service providers, marketing partners, marketing or advertising networks, other third parties, and publicly available sources.

The following provides examples of the type of information that we collect in a variety of contexts and how we use that information.

Context	Types of Information	Primary Purpose for Collection and Use of Information
Client/Customer Information	We collect the name and contact information, such as postal, billing, shipping, and email address and/or telephone number, of our clients and their employees with whom we may interact.	We collect this information to contact our clients/customers and communicate with them concerning normal business administration, such as our products, services, and billing.
Vendor Information	We may collect information about the employees of companies with whom we	We collect this information to contact our vendors and their employees to

	do business, including name, email address, and mailing address.	communicate with them concerning normal business administration, such as orders, services, and billing, and to otherwise provide our products to our customers.
Cookies and First-Party Tracking	We use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a website is viewed. These first-party cookies may enable us to collect analytics data and remember user settings on our website.	We use cookies to ensure that our websites operate efficiently, to provide you with more customized offers and information, to customize our websites to match your personal preferences, to improve our services and products offered, and to prevent fraud.
Cookies and Third-Party Tracking	We may place tracking technology on our website that collects analytics, records how you interact with our website, or allows us to participate in behavior-based advertising. This means that a third party uses technology (e.g., a cookie) to collect information about your use of our website so that they can report analytics to us or provide advertising about products and services tailored to your interests. That third party might also collect information over time and across different websites in order to serve advertisements on our website or other websites.	We collect this information to analyze how our websites are being accessed and used, to improve user experience and the overall quality of our websites, and to customize advertising and content. Please see the <u>Your Choices</u> section below for information on how to disable targeted advertising.
Email Interconnectivity	If you receive email from us, we may use certain tools to capture data related to when you open our message, click on any links or banners it contains, and conduct business.	We collect this information to understand how you interact with our communications to you.
Inquiries, Comments, Feedback, and Support	If you provide us feedback or contact us for support or with inquiries regarding an order, we will collect your name and email address, as well as any other content that you send to us, in order to reply.	We collect this information to respond to or follow up on your comments, inquiries, and other requests.
Mobile Devices	We collect information from your mobile device, such as unique identifying information broadcast from your device when visiting our website. This may include your Media Access Control (“MAC”) address, device manufacturer and model, device identifier, screen resolution, and the type and version of your operating system and browser.	We collect this information to identify unique visitors and understand how users interact with us on their mobile devices.
Order Placement	We collect your name, billing address, shipping address, email address, payment information, and phone number, when you place an order.	We use your information to fulfill your order when you make a purchase, including arranging for shipping and providing you with invoices or order confirmations.

Public Health and Safety	In certain situations where a serious public health threat has been identified, we may collect information from customers, guests, and other individuals accessing our facilities. This may include medical and health information, such as body temperature, symptoms, and underlying health conditions.	We collect this information to protect the health and safety of our customers and visitors. In some jurisdictions, we may be required by law, regulation, or governmental order to collect and retain information related to issues of public health and safety.
Surveys	When you participate in a survey, we may collect information that you provide through the survey. If the survey is provided by a third-party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We collect this information to understand your opinions and collect information relevant to our organization.
Website Interactions	We use technology to monitor how you interact with our website. This may include which links you click on or information that you type into our online forms. This may also include information about your device or browser.	We collect this information to understand how you interact with our website, to better improve it, and to understand your preferences and interests in order to select offerings that you might find most useful. We also collect this information to detect and prevent fraud.
Web Logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the internet is used), domain name, click-activity, referring website, and/or a date/time stamp for your visit.	We collect this information to monitor our networks and the visitors to our website. Among other things, it helps us understand which of our services is the most popular and assess the impact of our marketing and advertising campaigns.

How We Use Information

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you, or otherwise verify your identity, when you visit our website.
- In the normal course of business, for example by confirming your order, billing, and shipping information, processing payments or refunds, delivering products, and communicating with you regarding orders.
- To communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues, or feedback or to send you information regarding our website, changes to our terms, conditions, or policies, or other administrative matters.
- To send marketing materials, including information relating to our products and services..
- To detect and protect against malicious, deceptive, fraudulent, or illegal activity, including violation of our policies and terms and conditions, security incidents, and harm to the rights, property, or safety of our company and our users, employees, or others.
- To debug, identify, and repair errors that impair existing intended functionality of our website to ensure it operates properly and efficiently.
- To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.
- For internal administrative purposes, as well as to manage our relationships.

- For such other purposes as you may consent (from time to time).

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose.

To the extent we maintain and use personal information in a deidentified form, we will not attempt to reidentify the information, except for the purpose of determining whether our deidentification processes satisfy our legal obligations or to assist in the technical functions of our website.

How We Share Information

In addition to the specific situations discussed elsewhere in this Privacy Policy, we may disclose personal information in the following situations:

- **Affiliates and Acquisitions.** We may share information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, our business, or our assets, or merges or plans to merge with our company, we will also share information with that company, including at the negotiation stage. Your information may also be disclosed in the event of any reorganization, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).
- **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third-party intermediary.
- **Service Providers.** We may share your information with service providers. Among other things, service providers may help us to administer and host our website, store data, analyze data, conduct surveys, provide technical support and customer service, provide IT infrastructure, provide email delivery and administration, process payments, assist in the fulfillment of orders, and provide auditing or similar services.
- **Third-Party Advertising Companies.** We may place tracking technology on our website that collects analytics, records how you interact with our website, or allows us to participate in behavior-based advertising. These advertising companies may use information about your visit to our website to provide advertisements about goods and services that may be of interest to you and may place cookies or similar technologies on your browser.
- **Other Disclosures with Your Consent.** We may disclose your information to other third parties when we have your consent or direction to do so.

Your Choices

Some jurisdictions give you a right to make the following choices regarding your personal information:

- **Access to Your Personal Information.** You may request access to your personal information or confirmation that we have and process information about you. In certain limited circumstances, you may also request to receive access to your data in a portable, machine-readable format.
- **Changes to Your Personal Information.** You may ask us to correct information that is inaccurate or incomplete. Note that we may keep historical information in our backup files as permitted by law.
- **Deletion of Your Personal Information.** You may request that we delete your personal information. If required by law, we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another business purposes.

- **Opt-out of Targeted Advertising.** Although we do not “sell” your personal information for money, we may use some of your personal information for advertising performance analysis, use your information for audience modeling for ongoing advertising, disclose your information to data brokers, and/or participate in data co-ops, which may constitute a “sale” under certain privacy laws. You may opt out of online tracking-based targeted advertising (e.g., cookies) by clicking the cookie icon at the bottom right of your screen where you can select your preferences and toggle on “Do Not Sell or Share My Personal Information” indicating that you do not want us to sell your personal information or share your personal information for online targeted advertising activities.. Please note that if you change browsers or computers, or if you clear your browser’s cache, you may need to click the cookie icon again to apply your preference.
- **Objection to Certain Processing.** You may object to our use or disclosure of your personal information by contacting us at the address described below.
- **Online Tracking.** We do not currently recognize the “Do Not Track” signal.
- **Revocation of Consent.** Where we process your personal information based upon consent, you may revoke consent. If you revoke your consent for the processing of personal information, then we may no longer be able to provide you services.

Please note that not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. We will not discriminate against individuals who exercise their privacy rights under applicable law.

Submitting Requests

You may exercise the rights described above by contacting us as indicated in the **Contact Information** section below. If you disagree with how we handled a request, you may appeal our decision by contacting us with the subject line “Appeal.”

Note that, as required by law, we will require you to prove your identity. We may verify your identity by email. Depending on your request, we will ask for information such as your name, the item(s) included in your last order from us, or the date of your last order from us. We may also ask you to provide a signed declaration confirming your identity. Following a request, we will use reasonable efforts to supply, correct, or delete personal information about you in our files.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. If you are an authorized agent submitting a request on behalf of an individual, you must attach a copy of written permission indicating that you are able to act on another person’s behalf.

How We Protect And Retain Information

No method of transmission over the internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

We retain your personal information for only as long as necessary to fulfill the purposes outlined in this Privacy Policy, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by law. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, the purposes for which we obtained the information and whether we can achieve those purposes through other means, as well as applicable legal requirements.

Transmission Of Information To Other Countries, States And Provinces

As a multi-national company, we transmit information between and among our affiliates. As a result, your information may be transferred to and processed in a foreign country, state, or province, including transfers of information out of Quebec and the EEA.

Third-Party Applications/Websites

For your convenience, we may provide links to, or otherwise make available through our website or applications, other websites, other applications, and third-party content or services that we do not own or operate. The websites and third-party content to which we link may have separate privacy notices or policies. Please note that we have no control over the privacy practices, websites, or services that we do not own. We encourage you to review the privacy policies of any third-party website or application for details about such third party's privacy practices.

Changes To This Privacy Policy

We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy. Our privacy policy includes an "effective" and "last updated" date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.

Contact Information

If you have any questions, comments, or complaints concerning our privacy practices, or if you need to access this Privacy Policy in an alternative format due to having a disability, please contact us at: tkMAT-na-steel@thyssenkrupp-materials.com or call us at: (713) 626-2900. We will attempt to respond to your requests and to provide you with additional privacy-related information.

Additional Information For California Residents

California law requires us to disclose the following additional information related to our privacy practices. If you are a California resident, the following privacy disclosures apply to you in addition to the rest of the Privacy Policy.

- **California Shine the Light.** If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing, please submit a written request to us using the information in the **Contact Information** section above.
- **Notice of Collection.** The table below describes the categories of personal information we collect, disclose for a business purpose, "sell" and/or "share" (as those terms are defined by California law). Please note that in addition to the recipients identified below, we may disclose any of the categories of personal information we collect with government entities, as may be needed to comply with law or prevent illegal activity. We do not knowingly sell the personal information of minors under 16 years of age. As discussed elsewhere in this Privacy Policy, we use cookies and similar tracking technologies for purposes of targeted advertising. For more information, please see the portions of this Privacy Policy discussing cookies and similar tracking technologies. For details regarding how we use personal information, please see the **Information We Collect** section of this Privacy Policy. For information regarding how long we retain personal information, please refer to the **How We Protect And Retain Information** section of this Privacy Policy.
- **California Sensitive Information Disclosure.** We do not collect categories of sensitive personal information (as defined under California law).

Category of Personal Information	Category of Recipients	
	Disclosures for a Business Purpose	Selling and/or Sharing for Cross-Context Behavioral Advertising
Identifiers – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, internet protocol (IP) address, device ID, or other similar identifiers.	<ul style="list-style-type: none">• Affiliates or subsidiaries• Business partners• Internet service providers• Operating systems and platforms• Other service providers• Payment processors and financial institutions	<ul style="list-style-type: none">• Advertising networks

	<ul style="list-style-type: none"> • Professional services organizations, which may include auditors and law firms • Social networks 	
Financial information – this may include bank account number, payment information, and other financial information.	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Government entities, as may be needed to comply with law or prevent illegal activity • Other service providers • Payment processors and financial institutions • Professional services organizations, which may include auditors and law firms 	N/A
Commercial information – this may include information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Other service providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms 	N/A
Internet or other electronic network activity information – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Other service providers • Professional services organizations, which may include auditors and law firms 	N/A
Inferences drawn from any of the information listed above	<ul style="list-style-type: none"> • Government entities, as may be needed to comply with law or prevent illegal activity • Other service providers • Professional services organizations, which may include auditors and law firms 	N/A

Effective Date: June 3, 2025

Last Update: June 3, 2025 (Ver. 1)