

East Coast Stainless Privacy Statement

INTRODUCTION

East Coast Stainless Inc. and its subsidiaries, affiliates and JV companies (together “East Coast Stainless”, “ECS”, “we”, “our” or “us”) are committed to protecting your privacy and complying with applicable data protection and privacy laws globally.

This statement details how we collect, use and manage the personal information provided to us, whether by individuals we do business with, job applicants or by visitors or users of our website.

We want to help you make informed decisions, so please take a few moments to read this statement.

DATA COLLECTION & USE

East Coast Stainless collects personal information from a range of individuals in the context of its business activities, including:

- Representatives of our counterparties and advisors
- Job applicants
- Users of our website
- Anyone who provides their personal information to us

Data collected directly from individuals

The types of personal information we may collect from you, includes:

- contact details such as your name, title, company name, job position, email address, telephone numbers and physical address
- photographic identification
- Information disclosed by you in communications via telephone, letter, email, social media or in meetings
- Information collected from due diligence checks and clearance questionnaires
- Attendance records where you attend our offices and sites
- Feedback from you about our products and services, including our websites
- Third party references and details of your education and employment history together with salary information and additional personal information as described in your CV if you are applying for a job

We collect personal information from you through our websites in the following situations:

- you complete one of the “Contact Us” forms which appear on many pages of our websites or you click on the “Email” tab
- you apply for a position with East Coast Stainless through the careers page of our website
- you use one of the customer or supplier tools available through our websites and submit your personal information through these tools
- you register with us to receive alerts

When collecting information that might be used to contact you about products or services, we give you the opportunity to opt out from receiving such communications.

We only use the personal information collected from you for legitimate business-related purposes, including:

- To respond to queries or requests submitted by you
- To process orders or applications submitted by you

- To perform any contract between you and us
- To manage accounts and records
- To conduct clearance procedures
- For demographic analysis and to personalize your web experience
- To support our corporate social responsibility activities and company policies
- To comply with any law or regulation

Data collected by automated means

We automatically collect certain standard information that is sent by your browser to our website when you use them. This includes technical information such as the type of internet browsers you use, the websites from which you linked to our websites, language and time zone settings, access times and your IP address, which may be recognized as personal information.

We use this information to administer our website and for legitimate internal operational reasons including troubleshooting, data analysis, testing, research and statistical and survey purposes.

We also collect limited personal information from cookies on our websites, which we explain more about below.

OUR USE OF COOKIES

Like many websites we use cookies for a variety of purposes.

A cookie is a small data file, which often includes an anonymous unique identifier that is sent to your browser from a website's computers and is stored on your computer's hard drive, if your browser settings allow it. These technologies collect information about your device hardware and interactions with our site. We use this information to help us to analyze how our site is used so we can continually improve its content and functionality and to remember your preferences in case you revisit our site. We do not use cookies to target advertising or to share information with social networking sites or other services.

To learn about what cookies and similar technologies are and how you can delete or reject cookies, we recommend that you visit the following third-party website: <http://www.allaboutcookies.org/>.

DISCLOSURE OF PERSONAL DATA

East Coast Stainless will only disclose personal information if absolutely necessary in all circumstances. We may disclose your personal information, strictly for the following purposes:

- To third-party providers who use your personal information to provide a service to us
- If East Coast Stainless decides to sell, buy, merge or otherwise reorganize its businesses
- To protect any intellectual property rights in any materials displayed or otherwise available from our websites, portals and apps
- To respond to a legal request or comply with a legal obligation

Any third-party provider we appoint must act in accordance with our written instructions when processing your personal information and must protect your personal information in accordance with contractually agreed security measures.

East Coast Stainless does not sell, trade or rent your personal information, or use or disclose it for marketing purposes, and does not give or distribute it to any third parties except as described above.

INTERNATIONAL TRANSFERS OF PERSONAL DATA

Personal information collected on our websites, portals and apps may be stored and processed in the United States or any other country in which East Coast Stainless operate worldwide.

Where we store or transfer your personal information to a third-party provider based outside of the European Economic Area, we take steps so that your personal information is adequately protected.

SECURITY

East Coast Stainless is committed to protecting the security of your personal information. Whilst no security measure can guarantee against a data breach, we use a variety of security technologies and procedures to help protect data from accidental or unlawful destruction, accidental loss, unauthorized access, destruction, misuse, modification or disclosure.

YOUR RIGHTS

You may, under certain circumstance and pursuant to applicable law, have the right to access the personal information we hold about you and ask for it to be rectified and deleted at any time. You can do so through the "Contact Us" page on our websites.

DATA RETENTION

We only hold your personal information for as long as necessary to fulfil the purposes for which it was collected, before making it non-identifiable or deleting it.

If you choose to unsubscribe from a service then we may keep a list containing your details so we know you have unsubscribed.

LINKS TO OTHER WEBSITES

Our websites may contain links to those of other third-party companies. These websites operate independently from our websites and are not subject to this Privacy Statement. You should review the privacy statements of those websites to determine how they use and protect personal data.

CHILDREN

Our websites are general audience sites, however East Coast Stainless does not seek to gather information about children through its websites and will not do so deliberately. If you are under 16 years old, please do not send us your personal information (for example your name, address and email address). If you are under 16 years old and you do wish to ask a question or use this website in anyway which requires you to submit your personal information please ask your parent or guardian to do so on your behalf.

QUESTIONS

If you have any questions or concerns regarding this privacy statement or our handling of personal information, please contact us through the "Contact Us" page on our websites.

CHANGES TO THIS PRIVACY STATEMENT

East Coast Stainless may update this privacy statement from time to time. When we do we will revise the effective date at the top of the privacy statement.