



UPM Privacy Notice

Revision: 1.0

We are United Performance Metals, with its principal place of business at 3475 Symmes Road, Hamilton, OH, USA 45015 and have a subsidiary United Performance Metals Limited, Ballyharry Business Park, 6 Berkshire Road, Newtownards, County Down, BT23-7HH.

United Performance Metals is committed to being transparent about how we collect and use personal data and to meeting our obligations with respect to protecting that information. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process personal data.

This document covers information we collect about you, whether via our customer service center, at our locations, or via our websites: www.upmet.uk or www.upmet.com.

Personal Information That We Collect

The personal data that we collect relating to you may include your:

- Name and Title;
- E-mail Address;
- Delivery and Billing Address;
- Telephone Number(s);
- Credit or debit card information and/or other payment information;
- Online identifiers such as an IP address; and
- Any other personal information that you elect to provide to us when you complete our contact forms or otherwise make contact with us.

We may collect information from you in the following ways:

- If you contact us via mail, email, fax or telephone and provide any personal data
- If you visit or browse our website in accordance with our cookie policy at the end of this notice
- If you complete an online contact form
- If you initiate an inquiry or place an order for products or services on our website
- If you provide your contact details to us when registering to use an online account for accessing your account status or placing orders
- Via your order history and any relevant business documentation (such as but not limited to purchase orders, order acknowledgements, product conformity certificates)

How We Use The Information About You

We use your personal data as follows:

- To maintain our relationship with you whilst you are a customer;
- To provide you with our products and services - process orders, manage your account, answer your inquiries and provide specific advice about our products and to obtain your feedback on our products and services;
- For invoicing and processing payments;
- For record keeping, internal reporting and research purposes;
- To notify you about quality issues or changes to our products or services;
- To decide on and notify you about changes to our products and services, including changes to prices and quantities;
- To address any complaints about our products or services, and to provide evidence in any dispute between you and us;
- For logistical purposes, including to plan and track deliveries of products;
- To personalize your repeated use of our website and improve your experience, or as we may deem otherwise necessary to support the operation of our websites;
- To obtain credit references, credit checks and for debt collection, fraud detection and prevention, and other risk management purposes;
- As required by applicable law.

We may also contact you for feedback on your use of our products, services or our website and may need to use your information to send important notices, such as updated document content where there have been regulation/law revisions or changes to our terms, conditions and policies.

United Performance Metals takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. We do not collect any information from anyone under 13 years of age and our website, products and services are all directed to people who are at least 13 years old or older.

Use of your personal data for any purpose other than as specified in this policy will only occur with your consent, which you are free to withdraw at any time. We may send you direct marketing in relation to our products and services, as long as this is in line with any marketing preferences you have provided to us. Where applicable, if you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

Legal Basis for Processing

Our legal basis for processing your personal information includes:

- Where you have provided us with consent, for direct marketing purposes;
- For the performance of our contract with you for goods or services, or to take steps prior to entering into a contract with you;
- To comply with our legal obligations, including in relation to government regulations, performing required checks or screenings, and to address complaints, investigations or litigation;
- Our legitimate interests in (i) managing your account and our relationship with you, communicating with you, and processing payments, (ii) operating our websites, (iii) our internal business purposes, including record keeping, data security, maintaining and ensuring the quality of our products and services, investigating and responding to complaints and inquiries, changing our pricing, debt collection, fraud detection and prevention, risk management and protecting our rights, property and safety.

Sharing and Disclosing Your Personal Information

We may share your personal information with:

- third party provider(s) who provide the following types of services to us: marketing, market research, warehousing and logistics, software, recruitment and customer relationship management;
- third party providers who process payments made to us;
- third parties who serve as our sales agents or to perform services on our behalf, who are provided with access to certain customer account details in order to process sales or provide services on our behalf;
- third party advertising partners;
- credit reference agencies, debt collection agencies and lawyers when we carry out credit checks, to report on your payment performance and/or or seek to recover debts due to us;
- our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;
- emergency services in the event that we need to report accidents or incidents or request emergency assistance;
- any Government Department, public body or other third party where we believe in good faith that the law requires this; in the interests of public health and safety; or in order to protect the rights, property, or safety of BOC, its employees or others;
- any other third parties, if authorised by you to do so.

All processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Your Rights



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Please keep us informed if any of your personal information changes so that our records can be updated. We cannot be held responsible for any errors in your personal information in this regard unless you have notified us of the relevant change.

You have a number of statutory rights with respect to your personal data. Subject to certain conditions, and in certain circumstances, you have the right to:

- request access to your personal information - you can access and receive a copy of the personal information we hold about you and check that we are lawfully processing it;
- request rectification of your personal information - you may have any inaccurate or incomplete personal information we hold about you corrected;
- request the erasure of your personal information - you can ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected;
- restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information;
- object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground;
- data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact the UPM Compliance Manager. Please note that the rights described above are not absolute, and some rights may be subject to exceptions or qualifications

We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact UPM's Compliance Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.

Consent

If we are relying on consent for our legal basis for any processing, we will obtain your consent to positively opt-in prior to obtaining and processing your personal data and will clearly stipulate the type of data, the purpose for processing it and the ways in which it will be used. Records of consent will be kept and you have the right to withdraw consent at any time you choose.

Safeguarding Measures

United Performance Metals takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including (in line with our IT Security Policy):

Manage the Network Perimeter

Measures are deployed to limit access to network ports, protocols and applications filtering and inspecting all traffic at the network perimeter to ensure that only traffic which is required to support the business is being exchanged. All inbound and outbound network connections are controlled and managed. Technical controls are deployed to scan for malware and other malicious content.

Firewalls are deployed to form a buffer zone between the untrusted external network and the internal network used by the business. The firewall rule is set to deny traffic by default and a whitelist is applied that only allows authorised protocols, ports and applications to communicate with authorised networks and network addresses. This measure reduces the company's exposure of ICT systems to network based attacks.


Antivirus and malware checking solutions are deployed to examine both inbound and outbound data at the perimeter in addition to antivirus and malware protection that is deployed on internal networks and on host systems.

Protect the Internal Network

Measures are deployed to ensure that there is no direct network connectivity between internal systems and systems hosted on untrusted networks (such as the Internet), which limits the exposure of internal systems to network attacks from the Internet. Network traffic is monitored to detect and react to attempted or actual network intrusions.

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR)

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United Performance Metals transfers personal data outside of the EU for the below purposes:

- Authorising names and job titles that are contained within certificates of product conformity and that must accompany sold goods. Where we transfer personal information for the above reasons, we utilise the below safeguarding measures and mechanisms to ensure that your personal data is always safe and secure: -
 - restricted access
 - IT authentication
 - Firewalls
 - anti-virus/malware

We may also utilise some products or services (or parts of them) that may be hosted/stored in non-EU countries. We ensure that, where your personal information is transferred to any country outside the European Economic Area, this is done using “model clauses” (standard contractual clauses which have been approved by the European Commission as providing adequate safeguards to enable personal data to be transferred outside the EEA) or other specific legally-approved safeguards.

How Long We Keep Your Data

United Performance Metals retains personal information for as long as is necessary for the purposes for which the personal information was collected. We have strict review and retention policies in place to meet these obligations in line with legal requirements.

When determining the relevant retention periods, we will take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes, and
- guidelines issued by relevant data protection authorities, and
- Retention policies from your contracts’ quality system requirements, industry quality standards, and our UPM Quality Manual.

Otherwise, we securely erase your information once this is no longer needed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Consequences of Not Providing Your Data

Where we are relying on statutory/contractual requirement as our legal basis for processing your data, you are not obligated to provide your personal information to **United Performance Metals**. However, as this information is required for us to provide you with our products/services and meet our business obligations, we may not be able to provide you with our products/services without it.

Cookie Notice

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services.

We use cookies to:

Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some features will be disabled that may make your site experience more efficient, and your browser may not function properly. However, you will still be able to place orders.

Marketing

Consent

Occasionally, **United Performance Metals** would like to contact you with the products, services, or promotions that we provide. If you consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting **UNITED PERFORMANCE Metals** directly.

Legitimate Interests

United Performance Metals will occasionally send you products, services, or promotions by email, SMS, or post that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to opt-out/unsubscribe at any time.

Lodging A Complaint

United Performance Metals only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint.



Any objections should be made in writing to:

Compliance Manager, Brad Butler
 United Performance Metals
 3475 Symmes Road
 Hamilton, OH, USA
 45015
 bbutler@upmet.com

If you remain dissatisfied then you have the right to appeal directly to the Information Commissioner in the following countries for a decision.

- United Kingdom: www.ico.org.uk
- France: <https://www.cnil.fr>
- Poland: <https://giodo.gov.pl>
- Italy: <http://www.garanteprivacy.it>

| TABLE OF REVISIONS | | | | | | |
|--------------------|---------------|---------------|------------------|--------------------|--|----------------|
| Revision Number | Revision Date | Author | Revised Sections | Change Description | Review/ Approval of suitability & adequacy | Date of Review |
| 1.0 | 04/25/2018 | Rich Vanatsky | | First revision | | |
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