



## HOWMET AEROSPACE INC. CALIFORNIA PRIVACY NOTICE FOR NON-AFFILIATED INDIVIDUALS

**Last Revised: May 7, 2021**

Howmet Aerospace Inc., recognizes and respects the privacy rights of individuals and is committed to protecting their personal information. Howmet Aerospace, on behalf of itself and its controlled US subsidiaries (collectively “Howmet Aerospace”, “we”, “us”, or “our”), provides this California Privacy Notice (this “Notice”) to notify California residents of their rights under the California Consumer Privacy Act of 2018 (the “CCPA”). This Notice applies to California residents only and does not apply to any Howmet Aerospace affiliated individuals, including our employees, owners, directors, or contractors.

This Notice supplements Howmet Aerospace’s Online Privacy Notice located at <https://www.howmet.com/privacy/> and provides similar details about our collection, use, and disclosure of personal information that we collect on Howmet Aerospace’s websites (the “Sites”). This Notice also specifically addresses how job applicants and visitors to Howmet Aerospace’s facilities who are California residents might have their information collected and processed. If you do not feel comfortable with the practices described in this Notice, you should refrain from using our Sites, applying for a job or visiting our locations.

As used in this Notice, “personal information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include deidentified, aggregated, or combined information, or data that is not reasonably capable of identifying you or being linked to you. Personal information does not include publicly available information (such as information that is lawfully made available from federal, state, or local government records).

### **Sources of Personal Information**

We may collect personal information directly from you, such as when you visit our Sites, inquire about our products or services, or when you market to or provide a service to us. We also may collect your personal information indirectly, such as when a third party freely shares your information with us, or through online tracking technologies such as cookies. For more information on our use of cookies please review Howmet Aerospace’s Cookie Notice located at <https://www.howmet.com/global/en/pdf/Howmet-Aerospace-Cookie-Policy.pdf>.

### **Categories of Personal Information Collected**

We may collect and retain the following categories of information in the following ways:

<b>Category</b>	<b>Examples</b>	<b>How We Collect This Information</b>
A. Identifiers	For job applicants, we may collect contact information such as full name, postal address, telephone number and email address, and IP address.  For visitors to Howmet Aerospace facilities, we may collect information such as full name, home address, email address, personal telephone number, company name, business contact information, citizenship/U.S. person status, government ID	Directly and/or indirectly from you.

	number, security clearance information, date of birth, passport and/or photograph.	
B. Protected classification characteristics under California or federal law (such as age, color, medical condition, sex)	For jobs applications with U.S.-based Howmet entities, or current or prospective suppliers or subcontractors, we may collect information on your ethnicity, race, gender and disability status.	Directly from you.
C. Internet or similar network activity	Login credentials for the Sites that you use to access our network, approximate location information from where you access our network and information about your device and browser. We may also collect information on your browsing history, search history, information regarding your interaction with our Sites.	Indirectly from you.
D. Professional or Employment-related information	For employment/consultant applications we may collect information such as name; title; division; personal and business address, fax number, phone number, and email address; W-8 BEN form; W-9 form; biography with work history; photo; banking information provided with invoices; and business reference information including name and contact information and employer.  We may also collect other personal information submitted by job applicants, such as a résumé or C.V., work authorization information, salary history, information about security clearances, citizenship information.	Directly from you.
E. Education information	From job applicants, we may collect information on your education history.	Directly and/or indirectly from you.

### How We Use Your Personal Information

We may collect, retain and use your personal information to:

- provide our products and services;
- send you promotional materials or other communications;
- communicate with you about, and administer your participation in, special events, programs, offers, surveys and market research;
- respond to your inquiries;
- process employment applications, including by assessing qualifications, verifying information, and conducting reference or other employment-related checks;
- evaluate potential customers, consultants, suppliers and subcontractors and manage our relationships with them;
- perform data analyses (including anonymization and aggregation of personal information);
- negotiate, perform, and evaluate contracts;
- operate, evaluate and improve our business (including developing new products and services; enhancing and improving our products and services; managing our communications; analyzing our products, services and communications; and performing accounting, auditing and other internal functions);
- protect against, identify and prevent cybersecurity and other security events, espionage, fraud and

- other unlawful activity, claims and other liabilities;
- comply with and enforce applicable legal requirements, relevant industry standards and our policies; and
- as described to you when we collect your personal information or as otherwise set forth in the CCPA, provided, however, that in no case will we sell your personal information.

### **How We Disclose Your Personal Information and to Whom**

Below are the categories of personal information we may have collected about you in the preceding 12 months:

- Category A: Identifiers;
- Category B: Protected classification characteristics under California or federal law;
- Category C: Internet or similar network activity;
- Category D: Professional or employment-related information;
- Category E: Education information.

We may share your personal information with the following categories of third parties for the business purposes described below:

- With our service providers, who provide services such as auditing, advising, or protecting our business. These include IT service providers who help manage our IT and back office systems; payment processors; financial institutions; and others to complete transactions and for authentication, security, and fraud prevention.
- With regulators and law enforcement, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies, and when we believe disclosure is necessary or appropriate to prevent harm or financial loss, or in connection with an investigation of suspected or actual espionage, cybersecurity or security events or other fraudulent or illegal activity; and/or
- With third parties in the event we consider a sale or transfer of all or a portion of our business or assets (including in the event of a reorganization, spin-off, dissolution or liquidation).

In the preceding 12 months, we disclosed the following categories of your personal information to third parties for a commercial purpose:

- Category A: Identifiers; and
- Category C: Internet or similar network activity.

### **Right to Know**

You have the right to request the following information about the personal information we have collected about you in the preceding 12 months:

- the categories and specific pieces of personal information we collected about you;
- the sources from which we collected such information;
- the purpose for collecting such information;
- and the categories of third parties with whom we shared your personal information.

Please note the right to know does not apply to job applicants. Others may contact us using the methods in the Contact Us section below to request their information.

### **Right to Delete**

You have the right to request that we delete the personal information we have collected and retained about you. However, this right may not apply in some cases, including in the following instances to:

- complete the transaction for which we collected your personal information, fulfill the terms of a

written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and Howmet Aerospace;

- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- debug to identify and repair errors that impair existing intended functionality;
- enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- comply with a legal obligation; or
- use your personal information internally in a lawful way that is compatible with the context in which you provided it.

Please note that the right to delete does not apply to job applicants. Others may contact us using the methods in Contact Us section below to request deletion of your personal information.

### **Right to Opt-Out of Selling**

We do not sell personal information to third parties, nor do we offer financial incentives for the collection, retention or sale of your personal information. Like many websites, we may share certain information, such as your IP address, device ID, click ID, or other similar online identifiers with certain third party advertising and analytics vendors to improve your user experience, to learn how you use our Sites, and to help deliver interest-based ads to you. However, we seek your consent prior to engaging in such sharing. For more information on our use of cookies and related technologies and how to adjust your cookie settings, please review Howmet Aerospace's Cookie Notice located at <https://www.howmet.com/global/en/pdf/Howmet-Aerospace-Cookie-Policy.pdf>.

### **Right to Non-Discrimination**

You have the right not to be discriminated against for exercising any of your CCPA rights. Unless permitted by the CCPA, if you exercise any of your privacy rights, we will not:

- deny you goods or services, or access to our Sites;
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- provide you a different level or quality of goods or services or access to our Sites;
- suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services because of your exercise of your CCPA rights.

### **Exercising Your Rights**

To exercise your rights under the CCPA, contact us at the methods described in the Contact Us section below. Please note that only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information. To process your CCPA request, we will need to verify your identity, and may contact you by phone or e-mail to do so. You may designate an authorized agent to submit a request on your behalf to access or delete your personal information. To do so, the agent must be registered with the California Secretary of State to act on your behalf. Additionally, the agent must provide evidence that you have provided them with power of attorney pursuant to California Probate Code section 4000 to 4465, or in the alternative, you must: (1) provide that authorized agent written and signed permission to submit the request; and (2) verify your own identity directly with us. Please note, we may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

### **Do Not Track Signals**

Currently, we do not monitor or take any action with respect to Do Not Track signals or other mechanisms, which



means that we may collect information about your online activity both while you are using and after you leave our Sites.

### **Contact Us**

You may exercise your rights or authorize another person to act on your behalf, or ask us any questions about your privacy rights, by contacting our Privacy Office in the following ways identified below.

Write to:

Howmet Aerospace Inc.

Attn: Privacy Office 201

Isabella St.

Pittsburgh, PA 15212

Email: [privacy@howmet.com](mailto:privacy@howmet.com)

Call us toll free: 1-866-840-9121