

# Ferrolux Metals Co. Privacy Policy

**Updated: March 13, 2018**

## **Ferrolux Metals Co.'s Commitment to Privacy**

Ferrolux Metals Co. ("Ferrolux", "we", "our", and "us") respects your concerns about privacy, and is committed to complying with applicable privacy and personal data protection laws. This Ferrolux Privacy Policy (the "Policy") is intended to inform you about how the personal information that we collect through our website and webpages that post, specifically reference and incorporate this Policy (collectively, the "Site"), including all information that you may submit as a job applicant through the Site, and other Ferrolux recruiting channels, will be handled, shared, and protected by Ferrolux, whether accessed via computer, mobile device or other device (collectively, "Device").

This Policy also describes how you can reach us to update your personal information, access and control the use of the personal information, or get answers to questions you may have about our privacy practices at this Site. Please read this Policy carefully, because by accessing and using this Site you are acknowledging that you understand and agree to the terms of this Policy. In addition, please review our Terms of Use, which governs your use of this Site.

## **How We Use and Disclose Your Personal Information**

Ferrolux collects, discloses, and uses your personal information:

- for the purpose of determining your qualifications for employment and reaching a hiring decision;
- to comply with any legal process, applicable laws, and/or regulations;
- to defend ourselves in claims under such laws;
- to respond to your inquiries and fulfill your requests, such as to send you documents you request or e-mail;
- to send you important information regarding our relationship with you or regarding this Site, changes to our terms, conditions, and policies and/or other administrative information;
- for our business purposes, such as marketing new products and services, data analysis, audits, developing new products or services, enhancing our Site, improving our products and services, identifying Site usage trends, and determining the effectiveness of our Site;
- to our third party service providers who provide services such as website hosting and moderating, mobile application hosting, data analysis, infrastructure provision, credit card processing, IT services, e-mail services, marketing services, auditing services, and other services, in order to enable them to provide services;

- to a third party in the event of any reorganization, merger, sale, 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 proceedings); and
- when we otherwise have your consent.

In addition, we use and disclose personal information collected through this Site as we believe to be necessary or appropriate: (a) as permitted by applicable law, including laws outside your country of residence; (b) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (c) to enforce our Terms of Use; (d) to protect our operations or those of any of our affiliates; (e) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (f) to allow us to pursue available remedies or limit the damages that we may sustain.

Relevant portions of your personal information, if you are hired, also will be used to establish a basic employment record. We do not collect or use the personal information you submit as a job applicant via the online application for unrelated purposes.

Access to personal information that you provide via the online employment application will be restricted to those Ferrolux staff and designated agents who have a need to know the specific information in question in order to carry out their responsibilities with regard to recruitment or employment law. We do not disclose such applicant information to job banks, or to other companies or external parties.

### **How We Collect Personal Information about You**

Most of the personal information Ferrolux collects about you is collected directly from your submission of an online application and resume, which is stored on servers located in the United States. We also collect personal information you provide to us as described to you at the point of collection, such as when you (1) submit your name and e-mail address to receive product updates and marketing information, (2) contact us via the online “Contact” portal on the Site, and (3) send e-mail messages or feedback, or transmit other information by e-mail. When you elect to engage in such activities, we may ask that you provide us personal information, such as your first and last name, mailing address (including zip code), e-mail address, home and mobile telephone numbers, driver license number, and Social Security Number.

We may collect this type of information from you through other channels and the data may be stored on servers in other jurisdictions. We may also collect information about you from third parties, in order to: (a) verify information about your credentials, such as education and prior employment, (b) follow-up on references that you may provide, and (c) conduct background investigations. It is Ferrolux’s policy to collect such information from third parties only with your knowledge and agreement. Should Ferrolux wish to obtain such third party information about you, and you have not completed an employment application authorizing us to do so, we will contact you and request your authorization to proceed.

## Passive Information Collection and Use

As you navigate around this Site, certain information can be passively collected (that is, gathered without you actively providing the information), using various technologies. We passively collect and use information in a variety of ways, including:

- Through your browser: Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version, and Internet browser type and version. We may collect similar information, such as your device type and identifier, if you access this Site through a mobile Device.
- Cookies: Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to collect information such as browser type, time spent on this Site, pages visited, and language preferences. We and our service providers use the information for security purposes, to facilitate navigation, and display information more effectively. In addition, we use cookies to gather statistical information about Site usage in order to continually improve its design and functionality, understand how individuals use it, and to assist us with resolving questions regarding it.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies. If you set your browser to reject cookies, part of the Site may not work for you.

- Pixel tags, web beacons, clear GIFs, or other similar technologies: These may be used in connection with some Site pages to, among other things, track the actions of Site users and compile statistics about Site usage and response rates.
- IP Address: Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits this Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many web sites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering this Site.
- Device Information: We may collect information about your Device, such as a unique device identifier.

## **Your Access to Your Personal Information**

Once your resume is submitted for a specific opening, you will not be able to update the information contained in that copy of your resume. A new resume may be submitted when applying for other positions.

We give you choices regarding our use and disclosure of your personal information. You may opt-out of our collection of your personal information at any time by contacting us as specified below. We will seek to comply with your request(s) as soon as reasonably practicable.

If applicable and you would like to review, correct, update, or delete the personal information that you have provided via this Site, please contact us as specified below. We will try to comply with your request as soon as reasonably practicable.

### **Retention and Deletion of Your Personal Information**

Ferrolux retains your personal information only as long as is necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required to fulfill a legal obligation or to comply with applicable laws. After this time, your information is deleted, unless you consent to retaining the information for a longer period of time.

### **Safeguards**

Ferrolux uses reasonable administrative, technical, personnel, and physical measures under our control to safeguard your personal information against loss, theft, and unauthorized use or modification. In addition, we exercise certain special precautions in dealing with applicant personal data defined as sensitive by law. For example, when satisfactory completion of a medical examination is a condition for being hired, no medical information, apart from overall suitability or unsuitability for employment, is provided to hiring managers or stored in a new employee's personnel file.

Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised. We will take other steps in accordance with any applicable laws and regulations. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance the section below.

### **Communications from FMT**

Ferrolux may contact you, using the contact information you have provided, for purposes of responding to your application for a particular job or jobs. In addition, you may be notified about new jobs matching your preferences and other events and announcements.

### **Inquiries or Questions**

If you have questions or concerns about Ferrolux's policies and practices for handling applicant personal information, or otherwise, please contact us:

- By telephone - (734) 727-6161
- By email – 27800 W. Jefferson Ave., Gibraltar, MI 48173
- By mail – info@ferrolux.com

### **Changes to This Policy**

From time to time Ferrolux may revise this Policy. Should we do so, we will also change the date indicated above. We encourage you to check back at this Site periodically, in order to be aware of the most recent version of Policy. Any changes to this Policy will become effective when we post the revised Policy on this Site. Your use of this Site following these changes means that you accept the revised Policy.

### **Consent to process personal information**

By using the Site, you accept the terms of this Policy, thereby consenting to our collection, use, disclosure, and retention of your personal information as described in this Policy.

### **Accuracy**

It is your responsibility to provide Ferrolux with accurate personal information. Except as otherwise set forth in this Policy, Ferrolux shall only use personal information in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. To the extent necessary for these purposes, Ferrolux shall take reasonable steps to ensure that personal information is accurate, complete, current and relevant to its intended use.

### **Third Party Sites**

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or web property (including, without limitation, any application) that is available through this Site or to which this Site contains a link. The availability of, or inclusion of a link to, any such site or property on this Site does not imply endorsement of it by us or by our affiliates.

### **Use of Site by Minors**

We do not intentionally collect information from individuals under the age of 13. The Site is not directed to individuals under the age of 13 and we request that these individuals not provide personal information through this Site.

### **Compliance with Local Laws**

This Policy is meant to guide Ferrolux with respect to personal information collected from or about you at this Site. While this Policy applies to personal information generally, the local laws, rules and regulations of jurisdictions that are applicable to Ferrolux (“Local Laws”) may require standards which are stricter than this Policy and, in such event, Ferrolux will comply with applicable Local Laws. Specific privacy policies may be adopted to address the specific privacy requirements of particular jurisdictions.

### **Cross-Border Transfer**

Your personal information may be stored and processed in any country where we have facilities or service providers, and by using our Site or by providing consent to us (where required by law), you specifically acknowledge and agree to the transfer of information to countries outside of your country of residence, including to the United States, which may provide for different data protection rules, and a lower standard of required protection, than in your country.

### **Response to Do Not Track signals**

Some web browsers incorporate a “Do Not Track” (DNT) or similar feature that signals to digital devices that a visitor does not want to have his/her online activity tracked. Because not all web browsers offer DNT options and DNT signals are not yet uniform, we and many other digital service operators do not respond to DNT signals.

### **Compliance**

Ferrolux will use a self-assessment approach to verify compliance with this Policy and periodically verify that the Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, implemented and accessible.

If you believe that your personal information has been processed or disclosed in violation of this Policy, Ferrolux encourages you to raise any concerns using the contact information provided in this Policy. Ferrolux will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information.