



RELDAN PRIVACY POLICY

This Privacy Policy ("Privacy Policy") describes the types of personal information we, Abington Reldan Metals, LLC, ("Reldan", "us," our" or "we"), may collect about you in the context of your use of, and access to, our website located at <https://www.sibanyestillwater.com/business/americas/recycling/reldan/> and all other websites, mobile sites, services, applications, mobile applications, platforms and other tools where these terms appear or are otherwise referenced (collectively the "Website") and the features and functionality thereof (the "Service(s)"), the purposes for which we use the information, and the circumstances in which we may share such information.

When you visit the Website, we collect certain personal information about you. As used in this Privacy Policy, "personal information" means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, to you or your household.

By using the Website, you consent to the collection and use of your personal information as described in this Privacy Policy, and as applicable, our Terms of Use, and as permitted or required by law. If you do not agree with the terms set out in this Privacy Policy, please do not use our Website or Services.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to various laws in the United States and the General Data Protection Regulation which applies across the European Union (including in the United Kingdom), and we are responsible as "controller" of that personal information for the purposes of those laws.

Key Terms. It would be helpful to start by explaining some key terms used in this policy:

We, us, our

Abington Reldan Metals, LLC

Our representative in the EU according to Art 27 GDPR

Anaïs Morin
Address: Sibanye France SAS
Zone industrielle portuaire du Havre Port 5059
76430 Sandouville
France
Please add the following subject to all correspondence:
Privacy - US Recycling Operations

Our representative in the UK according to Art 27 UK-GDPR

Nicola Jackson
Sibanye-Stillwater UK Financing PLC
C/O Bracher Rawlins LLP
16 High Holborn
London WC1V6 BX
United Kingdom
Please add the following subject to all correspondence:
Privacy - US Recycling Operations

Our data protection officer

May be contacted at privacyEU@sibanyestillwater.com

Personal information

Any information relating to an identified or identifiable individual

Special category (sensitive) personal information

Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership
Genetic and biometric data
Data concerning health, sex life or sexual orientation

COLLECTION OF PERSONAL INFORMATION

The categories below describe the personal information we have collected and may have shared with one or more third parties in the past twelve months or may collect about you and may share with one or more third parties and the sources from which we collect those categories of personal information.

Category	Description	Source of Information
Personal Identifiers	name, email address; telephone number; postal or delivery address	you
Device and/or Online Identifiers	IP address; session ID; session timestamps	you; devices associated with you; third party information providers
Internet, Browser, and Network Activity	clickstream website tracking information; data related to user browser activity, including browser visits, page views, visits, and unique visitors data; and cookies or other similar technologies	you; devices associated with you; third party information providers
Log Information	Information automatically recorded by our servers, including but not limited to, your Internet Protocol address, operating system, browser type and language, referring URLs, access times, pages viewed, links clicked and other information about your activities on the Website;	you; devices associated with you; third party information providers
Mobile Device Information	hardware model, operating system and version, unique device identifiers, and mobile network information	devices associated with you; third party information providers
Cookies and Other Tracking Technology Information	See section below entitled "Cookies and Other Tracking Technologies" for a description of what cookies or other tracking technology may be employed on the Website.	devices associated with you; third party information providers
Location data	Region, country and city/municipality	you; devices associated with you; third party information providers
Professional, Employment or Educational information	Employer and employment status; Educational information that is not publicly available or personally identifiable, as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)	You, when you may inquire with us about employment or franchise opportunities; third party information providers we may use to validate information submitted in conjunction with an inquiry or application for employment
Inferences drawn from other personal information	Inferences drawn from any of the information identified above to create a user profile reflecting user preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	you; devices associated with you; third party information providers

This personal information is required to provide services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you.

USE OF PERSONAL INFORMATION

We may use your information for the following purposes:

- Sending you communications and administrative emails;
- Personalizing and tailoring the features, performance and support of the Website;
- Identifying you as a user on the Website;
- For the performance of a contract between you and us;
- Sending you promotional/marketing information, advertising, newsletters, offers or other information from us;
- Providing support related to your account or orders you may place on the Website;
- Providing you with opportunities and functionality that we think would be of particular interest;
- Analyzing, benchmarking and conducting research on user data and interactions with the Website;
- Processing services, resolving disputes, preventing fraud and verifying your identity;
- Monitoring, maintaining, administering and improving Website performance;
- Ensuring business policies are adhered to, e.g. policies covering security and internet use;
- Protecting your, our, or third parties' networks, systems, property, or physical safety;
- Complying with requests from regulatory agencies, law enforcement, and other public and government authorities, as well as with relevant industry standards and policies;
- Enforcing our contracts, terms, and conditions or otherwise exercising our legal rights; defending ourselves from claims; and complying with laws and regulations that apply to us or third parties with whom we work;
- Aggregating the information collected via cookies and similar technologies to use in statistical analysis to help us track trends, analyze patterns, and conduct research and product development;
- Statistical analysis to help us manage our business;
- Responding to your inquiries related to employment opportunities or other requests;
- Participating in any merger, acquisition, or other corporate transaction;
- Meeting our or third parties' audit and compliance requirements; and
- For any other purposes that we may specifically disclose at the time you provide or we collect your information.

The above list does not apply to special category personal or sensitive information, which we will only process with your explicit consent.

Anonymized or Aggregated Information

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual users) for various business purposes, where permissible under applicable laws and regulations, including for research, product development, and the purposes set forth above. We may publish or otherwise provide our research containing this aggregated data in our products and services to third parties. If you would like to opt out of inclusion of your information in such aggregated data, please email privacy@reldan.com.

SHARING OF PERSONAL INFORMATION WITH OTHER ENTITIES

We may share personal information about you with other entities, including entities that provide services to us. We do not disclose your personal information collected through the Website to other entities, except as described in this Privacy Policy.

We may share your personal information with the following types of entities or in the following situations:

Service providers: We engage service providers to facilitate our operation of the Website and provide the Services. These service providers analyze information about the Website and your use of the Website. Information disclosed for these purposes may include device and online identifiers, ISP information, session ID and /or session log data, information about your internet, browser, and network activity, and location data. We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you.

Legal authorities, emergency responders and other legal requirements: We may disclose personal information to third parties as permitted by, or to comply with, applicable laws, regulations, or legal obligations, including but not limited to responding to a subpoena or similar legal process, protecting against fraud, cooperating with law enforcement or regulatory authorities, protecting and defending the rights or property of Reldan, preventing or investigating possible wrongdoing in connection with the Website/Services, protecting the personal safety of users of the service or the public, and protecting against legal liability. Information disclosed for these purposes may include device and online identifiers, information about your internet, browser, and network activity, and location data.

For Business transfers: We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of our assets, financing, or acquisition of all or a portion of our business to another company.

Affiliates: We may share your personal information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

With Business partners: We may share your personal information with third party companies that are our business partners to offer you certain products, services or promotions.

Promotional Communications. We may use your personal information to send you updates by email about our services, including exclusive offers, promotions or new products or services.

We have a legitimate interest in processing your personal information for promotional purposes. This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

You have the right to opt out of receiving promotional communications at any time by contacting us at privacy@reldan.com.

Cookies and Other Tracking Technologies

We, our affiliates and/or other persons acting on our or their behalf use cookies and similar technology, such as web beacons (also known as clear GIFs or pixel tags), or similar technologies as they may develop over time to collect, use, and share information when you visit our online services or interact with us online, via email or through other electronic means.

Cookies are small pieces of data sent from a website and stored on a device. Cookies may enable us to capture and compile statistical information about how you use our online services, including information relating to your device's IP address, the frequency of your visits, readership data (such as

the average length of visits, which pages are viewed or shared during a visit or other interactions with our content, such as time spent viewing videos, PDFs read and links clicked), authentication information, acceptance or rejection of website terms, and periods of inactivity. To learn more about cookies, including information on what cookies have been set on your device and how cookies can be managed and deleted, visit <https://www.allaboutcookies.org/>.

Our online services also use web beacons. Web beacons are invisible tags and may be placed on a webpage, in advertisements, or in an email or other message. They usually work in conjunction with cookies, registering when a particular device visits a particular page.

“Clickstream” data (e.g., information regarding which of our Website pages you access, the frequency of such access, and your product and service preferences) may be collected by Reldan itself, or by our service providers, using cookies, web beacons, page tags, or similar tools that are set when you visit the Website or when you view an advertisement we may have placed on another website. Clickstream data and similar information may be shared internally within Reldan and used for administrative purposes to assess the usage, value and performance of our online products and services; to improve your experience with the Website; and as otherwise permitted by applicable law or regulation. This information may be processed by us for the purposes described above, or on our behalf by other entities, solely in accordance with our instructions.

How We Use These Technologies

We, our services providers, and third party business partners may use information collected from cookies, web beacons, and similar technologies for the following purposes:

- to allow our online services to operate as you have requested;
- to understand how our online services are accessed and used;
- to recognize you when you return to our Website;
- to assess the effectiveness of advertising and readership content;
- to deliver marketing communications that may be of interest to you, including ads or offers tailored to you; and;
- for other purposes described above under “USE OF PERSONAL INFORMATION.”

We may combine the information that we collect through cookies, web beacons and similar technologies with other personal information we have collected from you from both online and offline sources.

We may work with service providers to promote our products and services both on the Website and other websites. For example, if you visit a page on the Website or third-party websites that provides information about one of our products or services, a cookie may be placed on your browser or device that identifies the product or service you viewed. This information allows us, our service providers, and our third-party business partners to deliver more relevant and tailored content, such as ads for that particular product or service.

Other than service providers, we do not allow unaffiliated third parties to collect personal information about your activities on the Website.

Managing Your Preferences

Web Browser Preferences

Many web browsers allow you to manage your preferences. You can set your browser to refuse cookies or delete certain cookies. Unless you have adjusted your browser setting so that it will reject cookies, our system may issue cookies when you access or use our online services. In the event you

refuse to accept cookies by adjusting your browser setting, some or all areas of our online services may not function properly or may not be accessible.

You can also opt out of online targeted advertising by companies participating in the Digital Advertising Alliance by visiting <https://www.aboutads.info/choices>.

Mobile Device Preferences

Your mobile device may give you the ability to opt out of the use of information about the mobile browsers or apps you use in order to serve you ads that are targeted to your interests. You can stop the collection of location information from your mobile device by changing the preferences on your mobile device.

Do Not Track Policy

Most browsers can be set to send signals to third party websites requesting them not to track the user's activities. At this time, we do not respond to "do not track" signals. Consequently, our third party service providers may indeed track and collect information about your online activities over time while navigating to, from and on our online services, notwithstanding any "do not track" signals we may receive.

Keeping Your Personal Information Secure. Our goal is to protect your personal information submitted to us through our Website or online services. We maintain appropriate reasonable physical, electronic, and procedural safeguards that comply with applicable law to guard nonpublic personal information about you against loss, misuse or unauthorized access, disclosure, alteration or destruction of the information you have provided to us through our online services. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We have internal policies governing the proper handling of consumer information by personnel and requiring third parties that provide support or marketing services on our behalf to adhere to appropriate security standards with respect to such information. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. The security of your personal information is important to us, but please note that no method of transmission over the Internet, or method of electronic storage is perfectly secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

Where Your Personal Information is Held. The Website and our Services are United States-based, and are controlled, operated and administered from our offices within the United States. However, Reldan, its operations, workforce, and service providers are located throughout the world. Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: "SHARING OF PERSONAL INFORMATION WITH OTHER ENTITIES"). Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: "Transferring Your Personal Information Out of the EEA". For more information on how specific service providers process personal information, see the section below "Detailed Information on the Processing of Your Personal Information".

If you have additional questions about how we protect your information, please contact us at privacy@reldan.com.

Links to Other Websites

This Privacy Policy only applies to the use and disclosure of information we collect through our online services. Our online services may contain links to other websites belonging to third parties that are not affiliated with us. The inclusion of any link on our Website or otherwise in our online services does not

imply our endorsement of the linked website or service. While we try to link only to websites that meet our standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other websites, or links posted on our online services. Information you disclose to other parties or through such sites is subject to the privacy and security practices and policies of those parties or websites. We disclaim all liability, to the extent permissible, with regard to your access to such linked websites. Access to any other websites is at your own discretion and we encourage you to read the privacy statements of each and every website or online services visited in order to learn how such third parties may treat your information.

Information Collected from Third Party Companies

We may receive personal information and/or anonymous data about you from companies that help us provide our Services or with whom we enter into a business relationship. We may add this information to the personal information we have already collected from you via the Website or Services in order to improve the Services we provide, the features we offer you, or the functionality of the Website.

Email Communications

We will periodically send you free newsletters and e-mails that directly promote our products, our business partners' products, the use of our Website or the Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Withdrawing your consent for one mailing list will not affect your receipt of messages from other mailing lists or of information concerning your purchases. Despite your indicated e-mail preferences, we may send you service related or administrative communications, including notices of any updates to our Terms of Use or Privacy Policy.

How Long Your Personal Information Will Be Kept. Personal Information shall be processed and stored for as long as required by the purpose they have been collected for. Personal Information collected for purposes related to the performance of a contract between the us and you shall be retained until such contract has been fully performed. Personal information collected for the purposes of our legitimate interests shall be retained as long as needed to fulfill such purposes. Reldan may be allowed to retain Personal information for a longer period whenever you have given consent to such processing, as long as such consent is not withdrawn. Furthermore, we may be obliged to retain Personal information for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority. Once the relevant personal information retention period expires, Personal information shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

Transferring Your Personal Information Out of the EEA. To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- With our offices, which are located outside the EEA;
- With your and our service providers located outside the EEA;
- If you are based outside the EEA; or
- Where there is an international dimension to the services we are providing to you or the contract between you and us.

These transfers are subject to special rules under European and UK data protection law. These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be

secure. If you would like further information, please contact us at privacy@reldan.com or see "How To Contact Us" below.

Detailed Information on the Processing of Your Personal Information

Our third-party service providers have access to your personal information only to perform their tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Website

We use Wordpress.com to power our Website. You can read more about how Automattic, Inc., the owner of Wordpress.com uses your Personal Information here: <https://automattic.com/privacy/>.

We use Google Cloud Platform to provide functionality and features on our Website. You can read more about how Google uses your Personal Information here: <https://policies.google.com/privacy>.

We use Google Analytics and Google Tag Manager to help us understand how our customers use our Website and to manage our website. You can read more about how Google uses your Personal Information here: <https://policies.google.com/privacy>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

Email Marketing & Communications

We may use third party email service providers to manage and send emails to you. We may use your personal information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt-out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us. Third party services that we used or may use in the future include Constant Contact. For more information about these services and their privacy policies, please visit their websites. (<https://www.constantcontact.com/legal/privacy-notice>)

Behavioral Advertising

As described above, we use your personal information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

We may use the following providers for such advertising. You can read more about how these providers use your personal information and you may opt out of targeted advertising from these providers by using the links below:

Google Privacy Policy:

<https://policies.google.com/privacy>

Google opt-out:

<https://www.google.com/settings/ads/anonymous>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

PROTECTING CHILDREN'S PRIVACY ONLINE

Protecting the privacy of minors is important to Reldan. We comply with the Children's Online Privacy Protection Act in the United States, and similar laws around the world, where applicable. The Website, and the Services are not directed to or intended for individuals under 18 years of age. We do not knowingly collect or solicit personal information from or about individuals under the age of 18, or the relevant minimum age under applicable local legal requirements, except as permitted under applicable law. If you become aware that we have collected personal information from a minor, please contact us at privacy@reldan.com so that we can promptly investigate and address the issue.

CALIFORNIA RESIDENTS

California residents should be aware that this section does not apply to: personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) and its implementing regulations, the California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994; or other information subject to a California Consumer Privacy Act (CCPA) exception.

Your Rights under the CCPA

Under this Privacy Policy, and by law if you are a resident of California, you may have the following rights:

Disclosure of Personal Information We Collect About You	You have the right to know: • The categories of personal information we have collected about you; • The categories of sources from which the personal information is collected; • Our business or commercial purpose for collecting or selling personal information; • The categories of third parties with whom we share personal information, if any; and • The specific pieces of personal information we have collected about you. Please note that we are not required to: • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or • Provide the personal information to you more than twice in a 12-month period.
Personal Information Sold, Shared or Used for a Business Purpose	In connection with any personal information we may sell, share or disclose to a third party for a business purpose, you have the right to know: • The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and • The categories of personal information that we disclosed about you for a business purpose. You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale or disclosure of your personal information. If you exercise your right to opt-out of the sale, sharing or disclosure of your personal information, we will refrain from selling your personal information, unless you subsequently provide express authorization for the sale of your personal information. To opt-out of the sale, sharing or disclosure of your personal information if you are a resident of California, you may do so by following the instructions below or by emailing us at privacy@reldan.com.
Right to Deletion	Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will: • Delete your personal information from our records; and • Direct any service providers to delete your personal information from their records. Please note that we may not delete your personal information if it is necessary to: • Complete the transaction for which the personal information was collected, 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 us; • Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; • Debug to identify and repair errors that impair existing intended functionality;

	• Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; • Comply with the California Electronic Communications Privacy Act; • Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent; • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; • Comply with an existing legal obligation; or • Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
Right to Correction	If we maintain inaccurate personal information about you, you have the right to request us to correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.
Protection Against Discrimination	You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things: • Deny goods or services to you; • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information.

Exercising Your CCPA Data Protection Rights

In order to exercise any of your rights under the CCPA, and if you are a California resident, you can email us at privacy@reldan.com.

California law requires us to verify the requests we receive from you when you exercise certain of the rights listed above. To verify your request, we will check the information you provide us in your request against third party identity verification tools. As part of this process, we may call you after you submit your request to verify information. You may also designate an authorized agent to exercise certain of the rights listed above on your behalf by providing the authorized agent with power of attorney pursuant to the California Probate Code. If an authorized agent submits a request on your behalf, we will contact you to verify that they represent you.

Reldan will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Do Not Sell My Personal Information

We do not sell personal information. However, the third party service providers we partner with (for example, our advertising partners) may use technology on the Website that shares or “sells” personal information as defined by the CCPA law. If you wish to opt out of the use of your personal information for interest-based advertising purposes and these potential sales as defined under CCPA law, you may do so by following the instructions below or by emailing us at privacy@reldan.com. Please note that any opt out is specific to the browser you use. You may need to opt out on every browser on every device that you use.

Website

You can opt out of receiving ads that are personalized as served by our service providers by emailing us at privacy@reldan.com.

Mobile Devices

Your mobile device may give you the ability to opt out of the use of information about the apps you use in order to serve you ads that are targeted to your interests:

- "Opt out of Interest-Based Ads" or "Opt out of Ads Personalization" on Android devices
- "Limit Ad Tracking" on iOS devices

You can also stop the collection of location information from Your mobile device by changing the preferences on your mobile device.

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Website does not respond to Do Not Track signals. However, some third-party websites do keep track of your browsing activities. If you are visiting such websites, you can set your preferences in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track signals by visiting the preferences or settings page of Your web browser.

Your California Privacy Rights (California's Shine the Light law)

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their personal information with third parties for the third parties' direct marketing purposes. If you'd like to request more information under the California Shine the Light law, and if you are a California resident, you can contact us by email at privacy@reldan.com.

COLORADO RESIDENTS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy. The provisions contained in this section apply to all users who are consumers residing in the State of Colorado, according to the "Colorado Privacy Act" (the "CPA"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy. This part of the document uses the term "personal data" as defined in the CPA. Colorado law gives Colorado consumers the right to (i) access, correct, delete, or obtain a copy of their personal information in a portable format, and (ii) to request that a company not sell their personal information. If you are a Colorado consumer and wish to exercise these rights, please submit your request by emailing us at privacy@reldan.com.

CONNECTICUT RESIDENTS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy. The provisions contained in this section apply to all who are consumers residing in the State of Connecticut, according to "An Act Concerning Personal Data Privacy and Online Monitoring " (also known as "The Connecticut Data Privacy Act" or the "CTDPA"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy. This part of the document uses the term "personal data" as defined in the CTDPA. Connecticut law gives Connecticut consumers the right to: (i) access, correct, delete, or obtain a copy of their personal information in a portable format, and (ii) opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. If you are a Connecticut consumer and wish to exercise these rights, please submit your request by emailing us at privacy@reldan.com.

NEVADA RESIDENTS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy. The provisions contained in this section apply to all who are consumers residing in the State of Nevada, according to "Nevada Privacy of Information Collected on the Internet from Consumers Act" (also known as the "Nevada Privacy Law" or the "NPICICA"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy. The Nevada Privacy Law gives Nevada consumers the right to request that a company not sell their personal information. If you are a Nevada consumer and wish to exercise these rights, please submit your request by emailing us at privacy@reldan.com.

UTAH RESIDENTS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy. The provisions contained in this section apply to all who are consumers residing in the State of Utah, according to the "Utah Consumer Privacy Act" ("UCPA"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy. The UCPA gives Utah consumers the right to (i) access, delete, or obtain a copy of their personal information in a portable format, and (ii) opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data. If you are a Utah consumer and wish to exercise these rights, please submit your request by emailing us at privacy@reldan.com.

VIRGINIA RESIDENTS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy. The provisions contained in this section apply to all who are consumers residing in the State of Virginia, according to the "Virginia Consumer Data Protection Act" ("VCDPA"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy. The VCDPA gives Virginia consumers the right to (i) access, correct, delete, or obtain a copy of their personal information in a portable format, (ii) opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you, and (iii) not be discriminated against for exercising any of the data privacy rights granted. If you are a Virginia consumer and wish to exercise these rights, please submit your request by emailing us at privacy@reldan.com.

INTERNATIONAL USERS

Our online services are United States-based and are controlled, operated and administered by Reldan from its offices within the United States of America, and are made available to you on an unsolicited basis, without any marketing or promotion regarding these online services to you from Reldan or its personnel. This Privacy Policy is provided in accordance with and subject to applicable U.S. law. If you decide to continue to access our online services from your location outside the United States, you hereby agree that your use of those services is subject to this Privacy Policy and your personal information will be transferred to or processed within the United States.

GDPR Privacy

Legal Basis for Processing Personal Information under GDPR

We may process personal information under the following conditions:

- Consent - you have given your consent for processing personal information for one or more specific purposes.

- Performance of a contract - provision of personal information is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof.
- Legal obligations - processing personal information is necessary for compliance with a legal obligation to which we are subject.
- Vital interests - processing personal information is necessary in order to protect your vital interests or of another natural person.
- Public interests - processing personal information is related to a task that is carried out in the public interest or in the exercise of official authority vested in Reldan.
- Legitimate interests: processing personal information is necessary for the purposes of the legitimate interests pursued by the Reldan.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of personal information is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Rights under the GDPR

The Company undertakes to respect the confidentiality of your personal information and to enable you to exercise your rights under the GDPR.

Under this Privacy Policy, and by law if you are within the European Economic Area ("EEA"), you have the following rights:

Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

Exercising of Your GDPR Data Protection Rights

We hope that we or our Data Protection Officer can resolve any query or concern you raise about our use of your information. You may exercise your GDPR data protection rights by contacting us as set forth below. [clicking [here](#).] Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will try our best to respond to you as soon as possible.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

Contacting Our GDPR Data Protection Officer

We have designated a Data Protection Officer whom you have the right to contact with regard to all issues related to processing of your personal information and to the exercise of your rights under the GDPR. You may exercise your GDPR data protection rights by contacting us as set forth below. [clicking [here](#).]

EEA data subjects may contact the data protection officer with regard to all issues related to processing of their personal data and to the exercise of their rights under the GDPR.

Changes to This Privacy Notice.

We may change this privacy notice from time to time—when we do, we will inform you via our website or other means of contact such as email.

How to Contact Us. Please contact us, or our Data Protection Officer, by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Abington Reldan Metals, LLC

550 Old Bordentown Rd.
Fairless Hills, PA 19030

privacy@reldan.com

+1 800-764-9222

Do You Need Extra Help? If you would like this notice in another format (for example: audio, large print, braille) please contact us (see "How to contact us" above).