

California Privacy Policy

Metal One America, Inc. (“**Company**”) takes your privacy seriously. We want you to know how we collect, use, disclose, and retain your personal information.

California Notice at Collection: Company collects the personal information identified in Section 1 for the purposes identified in Section 3 and retains it for the period described in Section 5. We do not sell your personal information or disclose it for cross-context behavioral advertising. We also do not collect or process sensitive personal information for the purpose inferring characteristics about you. To the extent you provide Company with personal information about other California residents, you are responsible for providing this notice to them.

Assistance For the Disabled

Alternative formats of this Privacy Policy are available to individuals with a disability. Please contact privacy.policy@mtlo.com for assistance.

This Privacy Policy explains:

1. What categories of personal information we collect
2. The categories of sources from which we collect this personal information
3. The purposes for which we use your personal information
4. How we may disclose your personal information
5. How long we keep your personal information
6. Privacy rights for California residents
7. Changes to this Privacy Policy

CHILDREN’S ONLINE PRIVACY PROTECTION ACT COMPLIANCE

We do not collect information from anyone under 13 years of age. The products and/or services we provide, together with our Site, are all directed to individuals who are at least 13 years old. If you are under the age of 13, you are not authorized to use our services or the Site.

Scope

This Privacy Policy applies to the personal information of individuals (“**you**”, “**your**”, or “**yours**”) collected by Company, including the personal information collected when you visit our website <https://www.metaloneamerica.com/> as it may be modified, relocated and/or redirected from time to time (the “**Site**”). This Privacy Policy does not apply to the personal information of individuals in their capacity as prospective, current, or former employees, contract workers, board members, or owners of Metal One America, Inc., or their emergency contacts, dependents, or beneficiaries.

“**Personal information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

Other web sites

The Site may contain links to other web sites not operated or controlled by use (“**Third Party Sites**”). The policies and procedures we describe here do not apply to Third Party Sites. The links from the Site do not imply that we endorse or have reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

1) WHAT CATEGORIES OF PERSONAL INFORMATION WE COLLECT

- a) **Identifiers**, for example: real name, telephone number, postal address, e-mail address, and signature.
- b) **Commercial Information**, for example: records of products or services purchased and purchasing or consuming histories.
- c) **Internet Activity Information**, for example: information about your usage of the Site, such as the pages you viewed, the services and features you used or interacted with; your browser type and details about any links or

communications with which you interacted; internet protocol (IP); browser plug-in types and versions; and operating systems and platform.

- d) **Professional Information**, for example: business contact information and title.
- e) **Sensory or Surveillance Data**, for example: voicemails and recordings as described below in “User Content”.
- f) **User Content**, includes content you submit when you contact Company. This may include recordings you create, including audio recordings or voicemail you submit when you contact Company.
- g) **Communications Data**, for example: during our communications with you, we collect the content of these communications as well as metadata about the communications, *i.e.*, date and time of the call or text (SMS or MMS) message and phone numbers.

Note on Sensitive Personal Information: Company does not infer characteristics from sensitive personal information. Company only uses sensitive personal information as necessary to perform the services or provide the goods the average person would reasonably expect when requesting those goods or services, to ensure security and integrity, short term transient use, to maintain the quality of our products and services, or for other purposes permitted by the California Privacy Rights Act and implementing regulations (“**CPRA**”) without the right to opt out.

Do We Use Cookies?

Yes. Cookies are small files that the Site or our service provider transfers to your computer’s hard drive through your Web browser that enables the Site’s or service provider’s systems to recognize your browser and capture and remember certain information. We use cookies to help us understand how users use the Site. For example, cookies gather information about how long you spend on a web page so that we can understand what web pages are of most interest to users.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies by adjusting your browser settings. If you turn off your cookies, some of the features on the Site may not function properly.

Tracking Across Time and Different Sites

The Site does not track your online activities over time and across websites or online services on an individually identifiable basis. We do not allow third parties to use our Site to track your activities over time or across other websites.

Do Not Track Setting

Some web browsers incorporate a “Do Not Track” feature (DNT) that signals to the websites that you visit that you do not want to have your online activity tracked. Many websites and applications, including our site, do not currently respond to web browser DNT signals because such signals are not yet uniform. For more information about DNT signals, please visit <http://allaboutdnt.com>

2) THE CATEGORIES OF SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

- **You**, for example, when you contact us or when you otherwise provide information directly to us.
- **Service providers**, for example, analytics providers, IT, and system administration services.
- **Affiliated companies**, for example, so that we can assist other companies in the Metal One or Mitsubishi family of companies in providing you with products or services.
- **Automated technologies**, for example, browsing activity collected by automated technologies on the Site.
- **Third parties**, for example, lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- **Public sources**, for example, public databases.
- **Marketing/advertising companies**, for example, from social media platforms, consumer research companies, and analytics or marketing/advertising companies.
- **Surveillance/recording technologies installed by Company**, for example, video surveillance in common areas of Company facilities, voicemail technologies, and audio recording technologies with consent to the extent required by law.

- **Government or administrative agencies**, for example, law enforcement, public health officials, and other government authorities.
- **Acquired entity**, if Company acquired another entity, Company might collect personal information from that entity.

3) THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

Providing Products and Services, including:

- To deliver our products and administer our services.
- To communicate with you.
- To improve our products and services, develop new products and services, and conduct research on further improvements.
- To enhance your experience using our products and services and to personalize your online experience.

Support and Marketing, including:

- For customer support.
- To respond to any requests, queries, suggestions, feedback, or comments you may have.
- Where you have agreed to receive such information, to send you marketing information about our products and services, including notifying you of marketing events, membership and rewards programs, promotions, and sweepstakes.
- To inform you of any changes to the services, your account (if applicable), this Privacy Policy, or any other policies or terms in relation thereto.
- To perform operations to maintain the services, including to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends.

Monitoring, Security, and Compliance, including:

- To administer and protect our business and our Site (including troubleshooting, analysis, testing, system maintenance, support, reporting and hosting of data, and preventing fraud and abuse).
- To store, host, or backup (whether for disaster recovery or otherwise) our services or any data contained therein.
- To protect the rights, property, or safety of Company, you, or others.
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of Company or any of its subsidiaries or affiliates.
- To report suspected criminal conduct to law enforcement and cooperate in investigations.
- To exercise Company's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel.
- To ensure compliance with applicable laws and regulatory obligations.

Incidental Purposes: Any incidental purposes related to, or in connection with, the above.

4) HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

A. Disclosures Generally

Company discloses personal information as necessary for the purposes described in Section 3 above to the following categories of external recipients:

- **Service providers and contractors:** Company discloses your personal information to service providers and contractors for the purposes above to assist us in meeting our business needs and contractual and legal obligations.
 - Service providers and contractors include auditors, administrative service providers, law firms, and any other entity providing services to Company

- **Affiliated companies:** Other companies within the Metal One and Mitsubishi family, for example, to provide you with our products and services.
- **Government or administrative agencies:** For example, Company may report unlawful activity to law enforcement.
- **Public:** Company may disclose personal information to the public as part of a press release.
- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Company, our users, or others.
- **Corporate Transactions:** We reserve the right to disclose and transfer your personal information, including your personal information:
 - To a subsequent owner or co-owner.
 - In connection with a corporate merger, consolidation, bankruptcy, the sale of substantially all of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

B. Disclosures for Business Purposes

Company has disclosed each of the categories of personal information listed in Section 1, above, for the following “business purposes”, as that term is defined under the CPRA, in the last 12 months:

- **Service providers:** For the business purpose of performing services on Company’s behalf and, in particular, for the specific purposes described in Section 3, above.
- **Auditors, lawyers, consultants, and accountants engaged by Company:** For the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on Company’s behalf.
- **Affiliated companies:** To other companies within the Metal One and Mitsubishi family of companies for the business purposes of (1) auditing compliance with policies and applicable laws, (2) helping to ensure security and integrity, (3) debugging, (4) short-term transient use, (5) performing services on behalf of Company, (6) internal research, and (7) activities to maintain or improve the quality or safety of a service or device.

C. Sales and Sharing

We do not sell or share your personal information, where “share” means disclosing personal information to third parties for cross-context behavioral advertising. Without limiting the foregoing, we have not, and have no actual knowledge that we have sole or “shared” the personal information of individuals of any age, including the personal information of children under 16, in the last 12 months.

D. Aggregated and Deidentified Information

We may aggregate and/or deidentify information, use it internally, and disclose to third parties. Neither Aggregated Information nor Deidentified Information (defined below) is personal information.

- **“Aggregated Information”** refers to information about a group of individuals from which the individually identifiable information has been removed. An example of Aggregated Information would be the statistic that 20 people used our website’s contact form on a given day.
- **“Deidentified Information”** means information subjected to reasonable measures to ensure that the deidentified information cannot be associated with the individual. An example of Deidentified Information would be data point that an unidentified visitor first entered the Site through our main web page. We maintain Deidentified Information in a deidentified form and do not attempt to reidentify it, except that we may attempt to reidentify the information just to determine whether our deidentification processes function correctly. We prohibit vendors, by contract, from attempting to reidentify our Deidentified Information.

5) HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We retain your personal information for the duration of the customer relationship, if any. We also retain your personal information for 12 months after our last interaction with you. We will retain personal information longer as necessary to comply with legal, administrative, or procedural requirements, for example, a litigation hold.

6) PRIVACY RIGHTS FOR CALIFORNIA RESIDENTS

a) Your California Privacy Rights

Subject to applicable law, California residents have the following rights:

- **Right to Know:** You have the right to submit a verifiable request for copies of specific pieces of your personal information obtained from you and for information about Company's collection, use, and disclosure of your personal information. Please note that the CPRA's right to obtain copies does not grant a right to the whole of any document that contains personal information, but only to copies of "specific pieces" of personal information. Moreover, California residents generally just have a right to know categories, for example, categories of third parties to which personal information is disclosed, but not the individual third parties.
- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to Company.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by Company, taking into account the nature of the personal information and the purposes of processing the personal information.

b) How to Exercise Your Rights

Company will respond to request to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call 1-888-208-5889
-  [E-mail to privacy.policy@mtlo.com](mailto:privacy.policy@mtlo.com)

c) How We Will Verify Your Request

If you submit a request through an adequately secure password-protected account that you created before the date of your request, we will use the authentication mechanisms in the account to verify your identity. Otherwise, we match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (*e.g.*, a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond to your request, we will let you know promptly and explain why we cannot verify your identity.

d) Authorized Agents

If an authorized agent submits a request to know, correct, or delete on your behalf, the authorized agent must submit with the request either (a) a power of attorney that is valid under California law, or (b) document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity. You can obtain an "Authorized Agent Designation" form by contacting us at .

In the alternative, you can provide a power of attorney compliant with the California Probate Code.

e) Company's Non-Discrimination Policy

Company will not unlawfully discriminate against you for exercising your privacy rights under the California Privacy Rights Act.

7) CHANGES TO THIS PRIVACY POLICY

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

For More Information

For questions or concerns about Company's privacy policies and practices, please contact us at privacy.policy@mtlo.com.

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