

## **AIM Metals and Alloys L.P.**

### **Global Privacy Policy**

**Effective Date: December 2024**

This online privacy policy ("Policy") of AIM Metals and Alloys L.P. and its affiliates, (collectively designated herein as "AIM", "We", "Our" or "Us"). This Policy describes the information We collect from you, the way We use that information and the choices you have regarding how your information is used and applies only to information collected by AIM through its Site (including all webpages therein, the "Site") and does not apply to information collected by AIM otherwise. For the purpose of this Policy, the term "Personal Information" means information about an individual that allows them to be identified, either directly or indirect, including, name, personal address, telephone number and e-mail address.

Your use of the Site indicates that you have read, understood, and accepted our privacy practices, as described more fully in this Policy. If you do not agree to the terms of this Policy, please do not use the Site. Please note that your use of the Site is also subject to the Terms of Use also published on the Site.

#### **Children Under 14**

AIM does not knowingly collect Personal Information from children under the age of 14. Children are not authorized to use the Site or services. AIM accordingly asks that children under the age of 14 not submit any Personal Information to AIM or the Site. If we are notified that we have collected or received Personal Information from a child under the age of 14, we will delete that information. Since information regarding children under the age of 14 is not intentionally collected, AIM does not intentionally distribute Personal Information regarding children under the age of 14.

#### **Information gathered by AIM**

AIM collects certain information regarding the usage of the Site. This information is not associated with you as an individual, by itself or in combination with other information. This information is gathered to evaluate Site performance and to help us determine which features and services are most important to visitors. The anonymous information collected by the Site may include information such as the type of browser you are using, the Site's pages viewed, your IP address and the time spent on our Site.

You may also be asked to provide Personal Information on the Site. Personal Information can be gathered when you fill out and send feedback forms or send e-mails to AIM or when you register for a press release and publication list and/or when you communicate with Us by means of the "Contact Us" webpage. By providing Personal Information to AIM, you are consenting to its collection, use and disclosure in accordance with this Policy. Personal Information is only collected on the Site when you voluntarily submit Personal Information to Us.

#### **Use of Personal Information**

The following lists the types of Personal Information that may be collected by us on the Site:

- your first and last name\*;
- your phone number;
- your city\*;
- your region/state/province\*; and,

- your email address\*.

These types of Personal Information are collected in the “Contact Us” section once you have agreed to provide this information to us. Only the items with an asterisk (\*) are required to proceed with the information request on the “Contact Us” section.

The Personal Information collected by us on the Site is used solely to:

- process requests, and to keep you informed about your request status;
- deliver press releases and publication to you by e-mail or by post;
- respond to your inquiries;
- notify you of products or special offers that may be of interest to you;
- enforce the Site's Terms of Use; and
- prevent potentially prohibited or illegal activities.

### **Disclosure of Personal Information**

AIM may use and/or disclose anonymous "aggregated data" to third parties to tailor your experience of the Site, help AIM analyze interest in areas of the Site, the browsing behaviour of its users in order to improve the content, function and design of the Site and obtain data to make improvements to the Site.

AIM does not sell, rent, or share Personal Information with any third parties except as set forth in the present Policy. We occasionally hire third parties to provide limited services on our behalf, such as Site hosting, administering surveys, processing, mailing and delivering orders, and sending information about our products and services. However, such third parties are obligated to maintain the confidentiality of Personal Information and are not authorized to use Personal Information for any purpose except for providing those services.

Furthermore, we may disclose Personal Information when required by law. For instance, we may disclose Personal Information to:

- respond to a subpoena, court order, a law enforcement or governmental agency's request;
- verify or enforce compliance with the policies and applicable laws governing the Site; or
- protect against misuse or unauthorized use of the Site.

We also reserve the right to share, assign, or transfer your Personal Information to any of Our affiliates or to any successor in interest to our business by merger, sale of assets, reorganization, operation of law or otherwise. We also reserve the right to share anonymized and aggregated information with potential sale or merger parties, parties providing financing to us and their respective advisors.

Your Personal Information may be held at our offices, and those of the authorized third parties mentioned above. Some of these third parties may be based or share your information outside of your region of residence. By submitting Personal Information to us, you consent to the communication of your Personal Information to, and the storage of that Personal Information, outside of your region of residence. While such Personal Information is outside of your region of residence, it is subject to the

laws of the jurisdiction in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other jurisdictions pursuant to local laws.

Additionally, if you provide AIM with content for publishing or feedback, we may publish your username, name and/or location with your consent.

### **Third Party Sites**

Please be aware that the Site may contain links to other third-party websites. The privacy practices for the websites linked to the Site are not governed by this Policy and AIM is not responsible for them. If you provide any information to such third parties, different rules regarding the collection and use of your Personal Information may apply. We encourage you to read and review such third party's privacy policies before providing any data to them. These other Sites may send their own cookies or web beacons to users to collect data or solicit Personal Information.

Additionally, other companies which place advertising on the Site may collect information about you when you view or click on their advertising through the use of cookies or web beacons. We exercise no control over this collection of information. You should contact these entities directly if you have any questions about the use of the information that they collect.

### **Cookies, web beacons and analytical services**

Cookies constitute small bits of data that are deposited on your hard drive. Cookies allow you to store your password and other user information without having to constantly re-type this data. AIM and its marketing service providers utilizes Cookies to enhance your experience with the Site, identify repeat users, track usage behaviour and better serve users during future visits to the Site. Cookies can be disabled by turning them off in your browser. Consult your browser's documentation to discover how to do this. Please note that if you block cookies, some areas of the Site may not work properly.

Some of the Site's pages may contain web beacons and cookies. A web beacon is a technique used to monitor user activity across web pages for analytical purposes.

Moreover, AIM may, from time to time, use analytical platforms or services such as Google Analytics in conjunction with cookies or web beacons to, by way of example, display ads that may be of interest to you on the Site and on various sites that you may browse based on your age group, gender and interest categories.

You may terminate targeted content generated by analytical platforms by changing settings on your Google account and accessing opt-out pages maintained by third parties like the Network Advertising Initiative, the Digital Advertising Alliance of Canada and/or the Digital Advertising Alliance.

### **Security**

AIM has implemented physical, administrative and technical safeguards to protect Personal Information from unauthorized access, collection, use, disclosure, copying, modification or disposal in a manner commensurate with its sensitivity, the purpose for which it is to be used, its quantity, its distribution, its medium, its value and its criticality.

AIM employs generally accepted information security techniques, such as firewalls and access control procedures and complies with organizational controls such as the principle of least privilege, and technological controls such as computer passwords, and employee cyber security training to protect Personal Information against loss and unauthorized access.

While AIM implements reasonable precautions to protect Personal Information, we cannot guarantee at all times the security of such information. No method of transmitting or storing data is completely secure, particularly with respect to Internet applications.

## **Marketing Communications**

If you have requested to be on a mailing list and you wish to cancel that request, you can communicate with AIM's Communications Department by e-mail at [DataProtection@aimsolder.com](mailto:DataProtection@aimsolder.com), or if it's an e-mail mailing list, by clicking "unsubscribe" at the bottom of the e-mail.

Please keep in mind that, if you choose not to receive marketing communications, you will continue to receive transactional or account communications related to products or services that you have requested on our Site.

## **Your Rights**

Under certain circumstances and subject to applicable data protection laws, supported by a written request and proof of identification, you may consult the Personal Information that we have collected, used or shared, and/or ask that it be corrected, and/or withdraw your consent to our disclosure or use of personal information collected.

As required or permitted by law, you may be entitled to additional rights, including: (i) the right to control the dissemination of your Personal Information; (ii) the right to receive computerized Personal Information collected from you in a structured, commonly used and technological format and to have this information transferred directly to another organization; (iii) the right to be informed of and submit observations regarding automated decision-making; and (iv) the right to request information about data processing.

Finally, you also have a right to lodge a complaint with a competent data protection authority, in particular in the country/territory where you normally reside, where we are based or where an alleged infringement of data protection law has taken place, such as the *Commission d'accès à l'information du Québec*, or the Office of the Privacy Commissioner of Canada.

To exercise any of these rights, please contact us as set forth in the section below "Contact Us".

## **Policy Amendments**

AIM reserves the right to modify this Policy, along with related procedures, at any time. Modifications to the Policy will be published on the Site and will become effective on the date of publication. By using the Site following any such change, you agree to be bound by the revised terms and conditions of this Policy. For this reason, we encourage you to review this Policy whenever you use the Site, especially when you provide any Personal Information.

## **Contact us**

If you have any questions, requests or complaints regarding your Personal Information, this Policy or our practices related to this Site, please contact our Privacy Officer at:

**AIM Metals and Alloys L.P.**  
[DataProtection@aimsolder.com](mailto:DataProtection@aimsolder.com)  
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