

Umicore Privacy Statement for California Umicore Applicants

Effective Date: January 1, 2023

Last Reviewed on: April 10, 2023

1. Introduction

This Privacy Statement for California Umicore Applicants (the “**California Applicant Privacy Statement**”) applies solely to all job applicants (if you are made an offer, including a conditional offer, up until the time when you accept your offer) to the Umicore Group (“**Umicore**,” “**we**,” “**us**,” or “**our**”) who reside in the State of California (“**Applicant**” or “**you**”), including through the recruiting process. If you are applying online through a Umicore Group career website (a “**Career Website**”), the provisions our website’s general privacy statement at <https://www.umicore.com/en/privacy-and-cookie-notice/> and its terms of use at <https://www.umicore.com/en/terms-of-use/> should be read together with this California Applicant Privacy Statement and are incorporated herein by reference. We adopt this California Applicant Privacy Statement to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively, the “**CPRA**”) and any terms defined in the CPRA have the same meaning when used in this California Applicant Privacy Statement.

If you are applying online through a Career Website, the Career Website is operated by Umicore in order to support its recruitment efforts. The Career Website is not intended for distribution or use in any jurisdiction or country where such distribution or use would be contrary to local law or regulation. Also, applying on a Career Website does not extend binding offers or terms or conditions of employment. Any employment offer that may result from your submitting information in response to a job opening listed on a Career Website is in accordance with the specific terms of that offer and is not based in any way on the description of the job on a Career Website. Except as otherwise prohibited by law, nothing on a Career Website shall be construed as a contract of employment or as a guarantee of continued employment or employment for any specific duration. Employment with Umicore in the United States is “at will” and that generally cannot be modified by an employee or representative of Umicore. This means if you are hired, either you or Umicore can separate your employment at any time without notice or cause.

Umicore operates in different locations throughout the world: <https://www.umicore.com/en/careers/>. You understand and agree that, by applying through a Career Website for a particular position(s), your application also may be considered for other positions or other positions may be recommended to you based on your qualifications.

2. Scope of this California Applicant Privacy Statement

This California Applicant Privacy Statement applies to information that we collect about Applicants that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your device



(“**Personal Information**”). “Personal Information” includes all “Sensitive Personal Information” as defined below. However, publicly available information that we collect from government records and deidentified or aggregated information (when deidentified or aggregated as required under the CPRA) are not considered Personal Information and this California Applicant Privacy Statement does not apply.

This California Applicant Privacy Statement does not apply outside of the context of your relationship with Umicore as a Umicore Applicant or to certain Personal Information that is excluded from the scope of the CPRA, like Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA) and the Driver’s Privacy Protection Act of 1994. Some of these exclusions may be applicable to the Personal Information we collect about you as part of background checks. If you have any questions on whether one of these exceptions apply to your Personal Information, please contact the Human Resources department at the location you are applying for.

3. Information We Collect About You and How We Collect It

Umicore collects, and over the prior twelve (12) months has collected, the following categories of Personal Information about Applicants:

Category	Applicable Pieces of Personal Information Collected
A. Identifiers.	A real name; alias; postal address; online identifier; Internet Protocol address; email address; username; and other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name; signature; physical characteristics or description (if you voluntarily include it in your resume); address; telephone number; education; employment; and employment history. <i>NOTE: Some Personal Information included in this category may overlap with other categories.</i>
C. Protected classification characteristics under California or federal law.	Optional: Age (40 years or older); national origin; race; color; ancestry; religion or creed; marital status; medical condition; physical or mental disability; sex (including gender; gender identity; gender expression; pregnancy or childbirth and related medical conditions); sexual orientation; and veteran or military status. <i>NOTE: As an Applicant, providing this information is completely optional at your discretion, and we will collect this information only to the extent you choose to provide it in your resume or provide it during the recruitment process. If you are employed by Umicore, some of this information may be required to provide you benefits.</i>



F. Internet or other similar network activity.	Browsing history; search history; and information on your interaction with a Career Website.
G. Geolocation data.	IP-based information about your physical location or movements. This IP-based information can only identify your physical location or movements to a geographic region, such as town, city, state, and country, but cannot be used to identify your precise physical location or movements.
H. Sensory data.	Audio (voice messages); visual (pictures); or similar information, if you include it in your resume or as part of the recruitment process.
I. Professional or employment-related information.	Current or past job history.
K. Inferences drawn from other Personal Information.	Profile reflecting a person’s preferences; characteristics; psychological trends; predispositions; behavior; attitudes; intelligence; abilities, and aptitudes.
L. Sensitive Personal Information (“Sensitive Personal Information”)	<ul style="list-style-type: none"> • Complete account access credentials (usernames combined with required access/security code or password to access the Career Website); • Racial or ethnic origin (see note below); • Religious or philosophical beliefs (see note below); • Health; sex life; or sexual orientation information (see note below). <p>Note: <i>Providing information about your racial or ethnic origin, religious or philosophical beliefs, and health, sex life, or sexual orientation is completely optional at your discretion, and we will collect this information only to the extent you choose to provide it in your resume or as may be provided by a reference or other third party during reference and background checks.</i></p>

Umicore will not collect additional categories of Personal Information without providing you notice. We do not “sell” any categories of Personal Information for monetary or other valuable consideration and we do not “share” any categories of Personal Information for cross-context behavioral advertising.

4. Sources of Personal Information

We collect this Personal Information:

- Directly from you when you provide it to us;



- From third parties, such as prior employers, references, recruiters, and job-related social-media platforms, and other similar entities;
- When you use our Career Website or access our facilities as part of the recruitment process; and
- We also create this information during the course of the recruitment process.

Information You Provide to Us

We collect Personal Information when you apply for employment to Umicore, and during the recruitment process. This may include Personal Information you provide on your resume or during the recruitment process such as your name, address, work history, educational history, personal and work preferences (and any other information you may voluntarily disclose on your application or resume), personal email, and personal phone number.

We do not require, but you may also voluntarily choose to provide, other relevant information as part of your application. We would prefer that you avoid submitting the following sensitive information, except where such information is legally required, or needed for us to comply with our legal obligations and internal policies relating to diversity and anti-discrimination: medical or health conditions (i.e., for some positions, whether you can perform the essential functions for the position), veteran status, disabilities, gender, sexual orientation, race, ethnic origin, marital status, trade union membership, creed, nationality, national origin, and/or color.

Any information you submit must be true, complete, not misleading and you must have the lawful right to provide it. If not, this may lead to a rejection of your application during the application process or disciplinary action including immediate dismissal if you have been employed. If you intend to provide us with details of a reference or any other third party as part of your CV/résumé, it is your responsibility to obtain consent from that third party prior to passing the personal information to us. If you accept an offer for an employment relationship with Umicore, any Personal Information that you submit may become part of your employment file and may be used for other employment/work-related purposes as permitted by local law and as further set forth in our Employee Privacy Notice and California Personnel Privacy Addendum.

Information We Create About You

In addition to the Personal Information that you may provide to Umicore, Umicore also creates certain Personal Information about you and associates it with you. Umicore creates the following types of Personal Information about you: proposed job title, salary, expense, and other related compensation details.

Information We Collect Through Automatic Data Collection Technologies

As you use a Career Website, we may collect information about your use as necessary to protect our Career Websites and ensure that they are operating correctly and



efficiently. We may collect time, date, and location information of access to our Career Websites. We may also monitor, intercept, and review your activities when you use our Career Websites or apply for employment with Umicore, including but not limited to email (both outgoing and incoming) and documents you upload (such as your resume). Our facilities may also deploy video and other similar recording technologies which may be operated by a third party owner or operator of the buildings where our facilities are located.

Information We Collect from Third Parties

Umicore also collects Personal Information about you from third parties, such as prior employers, references, recruiters, and job-related social-media platforms, background check companies, and other similar entities. This may include Personal Information that is disclosed from your former employers, educational institutions, and other references you list on your application materials or that are referred to us. We may also collect Personal Information provided from recruiters and job-related social media platforms that you may use to submit your application, such as information on your resume or other information related to your previous or desired employment, if your application to us is provided through a recruiter or a job-related social media platform. To the extent permitted by applicable law, we may also collect Personal Information from general social media platforms.

5. Purposes for Our Collection of Your Personal Information

We may use the Personal Information we collect for one or more of the following purposes:

- recruiting, including identifying and evaluating Applicants, including assessing skills, qualifications, and interests for the purposes of determining suitability for the position for which you have applied or other suitable positions;
- to conduct applicant screening and maintaining records on such screening;
- communicating between you and Umicore;
- designing, implementing, and promoting Umicore's diversity and inclusion programs;
- compliance with applicable state and federal labor, employment, equal employment opportunity, and related laws;
- maintaining the security and safety of our facilities, personnel, and other assets, including to authenticate personnel to access our facilities or to a Career Website, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; and
- as described to you when collecting your Personal Information or as otherwise set forth in applicable law.



Umicore will not use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

6. Third Parties to Whom We Disclose Your Personal Information for Business Purposes

Umicore may disclose your Personal Information to third parties for one or more business purposes. When we disclose Personal Information to non-affiliated third parties for a business purpose, we enter a contract that describes the purpose, requires the recipient to both keep that Personal Information confidential and not use it for any purpose except for the purposes for which the Personal Information was disclosed and requires the recipient to otherwise comply with the requirements of the CPRA.

Umicore discloses and, in the preceding twelve (12) months, Umicore has disclosed the following categories of Personal Information of Applicants to the following categories of third parties for one or more of the business purposes described below:

Personal Information Category	Categories of Third Party Recipients
A. Identifiers.	Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems that we use to manage our recruitment process); building or property management and security personnel; and affiliates, parents, and subsidiary organizations of Umicore.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems that we use to manage our recruitment process); building or property management and security personnel; and affiliates, parents, and subsidiary organizations of Umicore.
C. Protected classification characteristics under California or federal law.	Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems that we use to manage our recruitment process); and affiliates, parents, and subsidiary organizations of Umicore.
F. Internet or other similar network activity.	Service providers (who manage our Career Websites, such as security providers and IT providers); and affiliates, parents, and subsidiary organizations of Umicore.
G. Geolocation data.	Service providers; and affiliates, parents, and subsidiary organizations of Umicore.
H. Sensory data.	Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems



	that we use to manage our recruitment process); and affiliates, parents, and subsidiary organizations of Umicore.
I. Professional or employment-related information.	Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems that we use to manage our recruitment process); and affiliates, parents, and subsidiary organizations of Umicore.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems that we use to manage our recruitment process); and affiliates, parents, and subsidiary organizations of Umicore.
K. Inferences drawn from other Personal Information.	Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems that we use to manage our recruitment process); and affiliates, parents, and subsidiary organizations of Umicore.

Sensitive Personal Information Category	Categories of Third Party Recipients
Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password)	Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems that we use to manage our recruitment process); and affiliates, parents, and subsidiary organizations of Umicore.
Racial or ethnic origin	If you choose to provide this in your application: Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems that we use to manage our recruitment process); affiliates, parents, and subsidiary organizations of Umicore; and government entities (for equal opportunity and other similar reporting purposes).
Religious or philosophical beliefs	We do not disclose this type of Personal Information.



<p>Health, sex life, or sexual orientation information</p>	<p>If you choose to provide this in your application: Service providers (who manage our applicant data, such as our enterprise resource planning systems and other systems that we use to manage our recruitment process); affiliates, parents, and subsidiary organizations of Umicore; and government entities (for equal opportunity and other similar reporting purposes).</p>
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We disclose your Personal Information to the categories of third parties listed above for the following business purposes:

- Helping to ensure security and integrity of our facilities and Career Websites to the extent the use of the Personal Information is reasonably necessary and proportionate for these purposes.
- Performing services on behalf of us, including maintaining or servicing accounts; providing recruitment services; verifying Personal Information from Umicore Applicants; providing analytic services; providing storage; or providing similar services to or on behalf of us.

In addition to the above, we may disclose any or all categories of Personal Information to any third party (including government entities and/or law enforcement entities) as necessary to:

- comply with federal, state, or local laws, or to comply with a court order or subpoena to provide information;
- comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- cooperate with law enforcement agencies concerning conduct or activities that we (or one of our service providers’) believe may violate federal, state, or local law;
- comply with certain government agency requests for emergency access to your Personal Information if you are at risk or danger of death or serious physical injury; or
- exercise or defend legal claims.

7. To Whom Do We Sell or Share Your Personal Information

“Sale” of Your Personal Information

In the preceding twelve (12) months, Umicore has not “sold” Personal Information of Applicants for either monetary *or* other valuable consideration, and we have not “sold” any Personal Information about minors under the age of 16.

“Sharing” of Your Personal Information for Cross-Context Behavioral Advertising



In the preceding twelve (12) months, Umicore has not “shared” Personal Information of Applicants for the purpose of cross-context behavioral advertising, and we have not “shared” any Personal Information about minors under the age of 16.

8. Applicant Data Requests

The CPRA provides Applicants with specific rights regarding their Personal Information. This section describes these rights and explains how to exercise those rights. You may exercise these rights yourself or through your Authorized Agent. For more information on how you or your Authorized Agent can exercise your rights, please see [Exercising Your CPRA Privacy Rights](#).

- **Right to Know.** You have the right to request that Umicore disclose certain information to you about our collection and use of your Personal Information over the past 12 months (a “**Right to Know**” request). This includes: (a) the categories of Personal Information we have collected about you; (b) the categories of sources from which that Personal Information came from; (c) our purposes for collecting this Personal Information; (d) the categories of third parties with whom we have shared your Personal Information; and (e) if we have “sold” or “shared” or disclosed your Personal Information, a list of categories of third parties to whom we “sold” or “shared” your Personal Information, and a separate list of the categories of third parties to whom we disclosed your Personal Information to. You must specifically describe if you are making a Right to Know request or a Data Portability Request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge.
- **Access to Specific Pieces of Information (Data Portability).** You also have the right to request that Umicore provide you with a copy of the specific pieces of Personal Information that we have collected about you, including any Personal Information that we have created or otherwise received from a third party about you (a “**Data Portability**” request). If you make a Data Portability Consumer Request electronically, we will provide you with a copy of your Personal Information in a portable and, to the extent technically feasible, readily reusable format that allows you to transmit the Personal Information to another third party. You must specifically describe if you are making a Right to Know request or a Data Portability request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. We will not disclose your social security number, driver’s license number or other government-issued identification number, or your account password or security question or answers in response to a Data Portability Consumer Request. We will also not provide this information if the disclosure would create a substantial, articulable, and unreasonable risk to



your Personal Information, your relationship with Umicore as an Applicant, or the security of our systems or networks. We will also not disclose any Personal Information that may be subject to another exception under the CPRA. If we are unable to disclose certain pieces of your Personal Information, we will describe generally the types of Personal Information that we were unable to disclose and provide you a description of the reason we are unable to disclose it. You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge, although you may have other rights to access certain pieces of your Personal Information under applicable labor and employment laws.

- **Correction.** You have the right to request that we correct any incorrect Personal Information about you to ensure that it is complete, accurate, and as current as possible. You may request that we correct the Personal Information we have about you as described below under [Exercising Your CPRA Privacy Rights](#). In some cases, we may require you to provide reasonable documentation to show that the Personal Information we have about you is incorrect and what the correct Personal Information may be. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.
- **Deletion.** You have the right to request that Umicore delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your Consumer Request (see [Exercising Your CPRA Privacy Rights](#)), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies pursuant to the CPRA. Some exceptions to your right to delete include if we are required to retain your Personal Information to maintain your Applicant relationship with us, to detect security incidents or protect against other malicious activities, and to comply with legal obligations. We may also retain your Personal Information for other internal and lawful uses that are compatible with the context in which we collected it.
- **Non-Discrimination.** We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not do any of the following as a result of you exercising your CPRA rights: (a) deny you employment or other similar relationship; (b) provide you with different compensation, benefits, work hours, or terms of employment or other similar relationship if you were employed by Umicore; or (c) suggest that you may receive different compensation, benefits, work hours, or terms of employment or other similar relationship or be denied employment or other similar relationship.

Exercising Your CPRA Privacy Rights

To exercise the rights described above, please submit a request (a “**Consumer Request**”) to us by either:



- Calling us at 888-338-0858.
- Emailing Umicore's Data Protection Manager at data_protection@umicore.com.
- Submitting a form with the human resources contact for the business unit to which you applied.
- Submitting a form via US mail to the human resources contact for the business unit to which you applied.
- Accessing your application on a Career Website (note that this may only provide limited abilities to update or access your Personal Information due to security reasons). **Note:** An applicant may delete their profile on Umicore's careers webpage and if successful, the applicant will receive an e-mail confirming the deletion of their profile.

If you fail to make your Consumer Request in accordance with the ways described above, we may either treat your request as if it had been submitted with our methods described above or provide you with information on how to submit the request or remedy any deficiencies with your request.

Only you, or your Authorized Agent that you authorize to act on your behalf, may make a Consumer Request related to your Personal Information. To designate an Authorized Agent, see [Authorized Agents](#) below.

All Consumer Requests must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an Authorized Representative of such a person. This may include:
 - Showing your government issued photographic identification, if you make your request live; and
 - Providing other information about you that we have already collected about you.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm which Personal Information relates to you or the individual for whom you are making the request as their Authorized Agent.

You are not required to create an account on our Career Website to make a Consumer Request. However, we do consider requests made through your password-protected account on the Career Website to be sufficiently verified when the request relates to Personal Information associated with that specific account.



We will only use new Personal Information provided in a Consumer Request to verify the requestor's identity or authority to make the request.

Authorized Agents

You may authorize your agent to exercise your rights under the CPRA on your behalf by registering your agent with the California Secretary of State (an "**Authorized Agent**"). You may also provide your Authorized Agent with power of attorney to exercise your rights in accordance with applicable laws. We may request that your Authorized Agent submit proof of identity and that they have been authorized to exercise your rights on your behalf. We may deny a request from your Authorized Agent to exercise your rights on your behalf if they fail to submit adequate proof of identity or adequate proof that they have the authority to exercise your rights.

Response Timing and Format

We will confirm our receipt of your Consumer Request within ten (10) business days of its receipt. We will generally process these requests within forty-five (45) calendar days of its receipt. If we require more time (up to an additional calendar 45 days), we will inform you of the reason and extension period in writing.

In response to a Right to Know or Data Portability Consumer Request, we will provide you with all relevant information we have collected or maintained about you on or after January 1, 2022, unless an exception applies. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For Data Portability Consumer Requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your Consumer Request unless it is excessive, repetitive, or manifestly unfounded. We reserve the right to consider more than two (2) total Right to Know or Data Portability Consumer Requests in a twelve (12) month period to be repetitive and/or excessive and require a fee. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

9. Your Choices Regarding our Use and Disclosure of Your Sensitive Personal Information

We do not use or disclose your Sensitive Personal Information for any purpose other than the following:

- to evaluate your application as reasonably expected by an average consumer who wishes to be considered for an employment or similar relationship with us;
- to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Information, provided that our



use of your Personal Information is reasonably necessary and proportionate for such purposes;

- to resist malicious, deceptive, fraudulent, or illegal actions directed at Umicore and to prosecute those responsible for those actions, provided that our use of your Personal Information is reasonably necessary and proportionate for this purpose;
- to ensure the safety of natural persons, provided that our use of your Personal Information is reasonably necessary and proportionate for this purpose;
- for short-term, transient use;
- to perform services on behalf of us, such as maintaining or servicing accounts, verifying Applicant information, providing analytic services, providing storage, or providing similar services on behalf of us; and
- to verify or maintain the quality or safety of the Career Website, business operations of Umicore, or a location that is owned, leased by, or controlled by us, and to improve, upgrade, or enhance the Career Website, the business operations of Umicore, or location that is owned, leased by, or controlled by us.

10. Personal Information Retention Periods

We retain your Personal Information for only as long as necessary for the purposes it was collected for. In general, if you do not become an employee, this is a minimum of one (1) year after the last action on your application. However, we may also retain any or all categories of Personal Information when your information is subject to one of the following exceptions:

- When stored in our backup and disaster recovery systems. Your Personal Information will be deleted when the backup media your Personal Information is stored on expires or when our disaster recovery systems are updated.
- When necessary for us to exercise or defend legal claims.
- When necessary to comply with a legal obligation. Please note that we are obligated under state and federal law to keep certain documents that may contain your Personal Information for at least the periods set forth in in such laws.
- When necessary to help ensure the security and integrity of our Career Website and IT systems.

Your Personal Information will be deleted when we no longer require your Personal Information for any of the above purposes.

11. Changes to This California Applicant Privacy Statement

Umicore reserves the right to amend this California Applicant Privacy Statement at our discretion and at any time. When we make changes to this California Applicant Privacy Statement, we will notify you regarding the updated notice through Umicore's



communication channels, including through email or paper notices, and update the addendum's effective date.

12. Contact Information

If you have any questions or comments about this California Applicant Privacy Statement, the ways in which Umicore collects and uses your information described above, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us through the Human Resources contact at the business unit to which you have applied or through Umicore's Corporate Data Protection Manager.

