

Umicore Privacy Notice Addendum for California Residents

Effective Date: January 1, 2023

Last Reviewed on: March 18, 2024

1. Introduction

This Privacy Notice Addendum for California Residents (the “**California Privacy Addendum**”) supplements the information contained in Umicore Group’s (“**Umicore**,” “**us**,” “**we**,” or “**our**”) Privacy and Cookie Notice and describes our collection and use of Personal Information (as defined below). This California Privacy Addendum applies solely to all visitors, users, and others who reside in the State of California (“**Consumers**” or “**you**”). We adopt this notice 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 notice.

2. Scope of this California Privacy Addendum

This California Privacy Addendum applies to information that we collect online and offline when you attend one of our events or a trade show, contact us, visit our website, when you subscribe to our newsletter, etc. and 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**”). However, publicly available information that we collect from government records and deidentified or aggregated information (when deidentified or aggregated as described in the CPRA) are not considered Personal Information and this California Privacy Addendum does not apply to such information.

This California Privacy Addendum does not apply to employment-related Personal Information collected from our California-based employees, job applicants, contractors, or similar individuals (“**Personnel**”). Please contact your human resources department if you are part of our California Personnel and would like additional information about how we process your Personal Information.

This California Privacy Addendum also does not apply to Personal Information reflecting a written or verbal business-to-business communication (“**B2B Personal Information**”) from our suppliers and other vendors. Please see our California Privacy Addendum for B2B Personal Information for information regarding our practices regarding your B2B Personal Information.

This California Privacy Addendum also does not apply to certain Personal Information that is excluded from the scope of the CPRA, like: (a) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and (b) Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.



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

We collect, and over the prior twelve (12) months have collected, the following categories of Personal Information about Consumers:

Personal Information Category	Applicable Pieces of Personal Information Collected
A. Identifiers.	A real name; alias; postal address; unique personal identifier; online identifier; Internet Protocol address; email address; account name; and other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name; signature; address; telephone number; and employment. <i>Some Personal Information included in this category may overlap with other categories.</i>
D. Commercial information.	Records of property, products, or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
F. Internet or other similar network activity.	Browsing history; search history; information on a Consumer’s interaction with a website, application, or advertisement.
G. Geolocation data.	We collect IP-based geolocation information when you access our website. This information can only be used to identify your general location when you access our Website, such as town, city, and state. We do not collect precise geolocation information that can determine your location within 1850 feet.
I. Professional or employment-related information.	Current employer and title/position.

Umicore will not collect additional categories of Personal Information without providing you notice. As further described in [To Whom Do We Sell or Share Your Personal Information](#), we may “sell” any categories of Personal Information for monetary or other valuable consideration and we may “share” any categories of Personal Information for cross-context behavioral advertising.



4. Sources of Personal Information

We collect Personal Information about you from the sources described in our Privacy and Cookie Notice.

5. Purposes for Our Collection of Your Personal Information

We only use your Personal Information for the purposes described in our Privacy and Cookie Notice.

We may use, “sell” for monetary *or other valuable consideration*, “share” for the purposes of cross-context behavioral advertising, or disclose the Personal Information we collect and, over the prior twelve (12) months, have used, “sold” for monetary *or other valuable consideration*, shared for the purpose of cross-context behavioral advertising, or disclosed the Personal Information we have collected, for the purposes described in our Privacy and Cookie Notice as well as the following additional purposes:

- Short-term, transient use, provided the Personal Information that is not disclosed to another third-party and is not used to build a profile about you or otherwise alter your experience outside the current interaction.
- Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.

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 specific business purposes for which the Personal Information was disclosed, and requires the recipient to otherwise comply with the requirements of the CPRA.

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

Personal Information Category	Categories of Non-Service Provider and Non-Contractor Third Party Recipients
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A. Identifiers.	Service Providers; business partners; affiliates, parents, and subsidiary organizations of Umicore; social media companies; Internet cookie information recipients, such as analytics.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Service Providers; business partners; affiliates, parents, and subsidiary organizations of Umicore.
D. Commercial information.	Service Providers; business partners; affiliates, parents, and subsidiary organizations of Umicore.
F. Internet or other similar network activity.	Service Providers; business partners; affiliates, parents, and subsidiary organizations of Umicore; social media companies; Internet cookie information recipients, such as analytics and behavioral advertising services.
G. Geolocation data.	Service Providers; affiliates, parents, and subsidiary organizations of Umicore.
I. Professional or employment-related information.	Service Providers; affiliates, parents, and subsidiary organizations of Umicore.

We disclose your Personal Information to the categories of third parties listed above for the following business purposes:

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Helping to ensure security and integrity of our products, services, and IT infrastructure to the extent the use of the Personal Information is reasonably necessary and proportionate for these purposes.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us. Our agreements with third parties prohibit your Personal Information from disclosure to another third-party and from using your Personal Information to build a profile about you or otherwise alter your experience outside your current interaction with us.
- Performing services on behalf of us, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing,



providing analytic services, providing storage, or providing similar services on behalf of us.

- Providing advertising and marketing services, except for cross-context behavioral advertising, to Consumers.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by 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 for Monetary or Other Valuable Consideration

As noted in our Privacy and Cookie Notice, we do not sell Personal Information as the term “sell” is commonly understood to require an exchange for money. However, the use of advertising and analytics cookies on our Website is considered a “sale” of Personal Information as the term “sale” is broadly defined in the CPRA to include both monetary *and other valuable consideration*. Using this broad definition, our “sale” is limited to our use of third-party advertising and analytics cookies and their use in providing behavioral advertising and their use in understanding how people use and interact with our Website. Our “sales” of your Personal Information in this matter is subject to your right to opt-out of those sales (see [Your Choices Regarding our “Sale” or “Sharing” of your Personal Information](#)). The CPRA prohibits third parties who purchase the Personal Information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.



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

Umicore may “share” your Personal Information for the purpose of cross-context behavioral advertising, subject to your right to opt-out of that sharing (see [Your Choices Regarding our “Sale” or “Sharing” of your Personal Information](#)). Our “sharing” for the purpose of cross-context behavioral advertising would be limited to our use of third-party advertising cookies and their use in providing you cross-context behavioral advertising (i.e., advertising on other websites or in other mediums). When the recipients of your Personal Information disclosed for the purpose of cross-context behavioral advertising are also permitted to use your Personal Information to provide advertising to others, we also consider this disclosure as a “sale” for monetary or other valuable consideration under the CPRA.

In the preceding twelve (12) months, Umicore has “sold” for monetary or other valuable consideration, or “shared” for the purpose of cross-context behavioral advertising, the following categories of Personal Information to the following categories of third parties:

Personal Information Category	Sold or Shared	Business or Commercial Purpose for Sale or Sharing (as appropriate)	Categories of Third Parties To Whom Your Personal Information is Sold or Shared
A. Identifiers.	Sold and Shared	Analytics.	social media companies; Internet cookie information recipients, such as analytics and behavioral advertising services.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	No	N/A	N/A
D. Commercial information.	No	N/A	N/A
F. Internet or other similar network activity.	Sold and Shared	Analytics.	social media companies; Internet cookie information recipients, such as



			analytics and behavioral advertising services.
G. Geolocation data.	No	N/A	N/A
I. Professional or employment-related information.	No	N/A	N/A

Sale of Personal Information of Minors Under the Age of 16

We do not have any actual knowledge that we “sell” the Personal Information of minors under the age of 16 for monetary or other valuable consideration and we do not have any actual knowledge that we “share” such Personal Information for cross-context behavioral advertising without affirmative consent as required by the CPRA. More information on how minors under the age of 16 may change their choice regarding the “sale” or “sharing” of their Personal Information can be found in [Your Choices Regarding our “Sale” or “Sharing” of Your Personal Information](#).

8. Consumer Data Requests

The CPRA provides California residents with specific rights regarding their Personal Information. This section describes your CPRA 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**” Consumer 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**” Consumer 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 also not provide any information if the disclosure would create a substantial, articulable, and unreasonable risk to your Personal Information 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.
- **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 also 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 or if the Personal Information is subject to another exception under the CPRA.
- **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, but are not limited to, if we are required to retain your Personal Information to complete the transaction or provide you the goods and services for which we collected the Personal Information or otherwise perform under our contract with you, 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 goods or services; (b) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (c) provide you a different level or quality of goods or services; or (d) suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

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 us at data_protection@umicore.com.

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 Agent of such a person. This may include:
 - Requesting that you provide information (or portions of information) so that we compare it against information that we already have, such as your email address, part of your phone number, or other similar information.
- 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.

Making a Consumer Request does not require you to create an account with us.



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

For instructions on exercising sale opt-out rights, see [Your Choices Regarding our "Sale" or "Sharing" of Your Personal Information](#).

Authorized Agents

You may authorize your agent to exercise your rights under the CPRA on your behalf by providing them with written authorization or with power of attorney to exercise your rights in accordance with applicable laws (an "**Authorized Agent**"). We may request that your Authorized Agent submit proof of identity and that they have been authorized 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 45 calendar days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

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 Request, 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 (or combination of the two) in a twelve (12) month period to be repetitive and/or excessive and require a fee. If we determine that your Consumer 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 "Sale" or "Sharing" of Your Personal Information

"Sale" of Your Personal Information

If you are 16 years of age or older, you have the right to direct us to not sell your Personal Information for monetary or other valuable consideration at any time (the "right to opt-



out”). We do not sell the Personal Information of Consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the “right to opt-in”) from either the Consumer who is between 13 and 16 years of age, or the parent or guardian of a Consumer less than 13 years of age. Consumers who opt-in to Personal Information sales may opt-out of future sales at any time.

“Sharing” of Your Personal Information

If you are 16 years of age or older, you have the right to direct us to not share your Personal Information for the purposes of cross-context behavioral advertising, which is showing advertising on other websites or other media based on your browsing history with our Website (the “right to opt-out”). We do not share the Personal Information of Consumers we actually know are less than 16 years of age for this purpose, unless we receive affirmative authorization from either the Consumer who is between 13 and 16 years of age, or the parent or guardian of a Consumer less than 13 years of age. Consumers who opt-in to our sharing of Personal Information for these purposes may opt-out of future such sharing at any time.

How You May Opt-Out of Our Sale or Sharing of Your Personal Information

To exercise the right to opt-out of the “sale” of your Personal Information for monetary or other valuable consideration and of “sharing” your Personal Information for the purposes of cross-context behavioral advertising, you (or your Authorized Agent) may opt-out of such sales by clicking the “Do Not Sell My Personal Information” link on our homepage, adjusting your cookie preferences by clicking the “Cookie Settings” link on our homepage, available at: <https://www.umicore.com/en/api/fw/cookie-consent/open/>, by configuring your browser to send us a privacy signal as described in more detail below. You may also set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. However, if you do not consent to our use of cookies or select this setting you may be unable to access certain parts of our Website or other websites. You can find more information about cookies at <http://www.allaboutcookies.org> and <http://youronlinechoices.eu>.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize our “sale” and “sharing” of your Personal Information. However, you may change your mind and opt back into the “sale” and “sharing” of Personal Information at any time by clicking the “Cookie Settings” link.

You do not need to create an account with us to exercise your opt-out rights. You may be required to provide us with additional contact information so that we may verify your request to opt-in to the sale of your Personal Information. We will only use Personal Information provided in an opt-out request to review and comply with the request.

If you (or your Authorized Agent) submit a request to opt-in to our “sale” or “sharing” of your Personal Information, we will use a two-step process in order to confirm that you want to opt-in for such “sale” or “sharing” of your Personal Information, such as requiring



you to confirm your cookie choices. By making a Consumer Request, you consent to us contacting you in one or more of these ways.

Browser Privacy Control Signals

You may also exercise your right to opt-out of the “sale” of your Personal Information for monetary or other valuable consideration and “sharing” your Personal Information for the purposes of cross-context behavioral advertising by setting the privacy control signal on your browser, if your browser supports it. We currently recognize and support the following privacy signals sent by browsers:

- Global privacy control (for more information on how to configure your browser to send this signal, please see <https://globalprivacycontrol.org/>).

When we receive one of these privacy control signals, we will opt you out of any further “sale” or “sharing” of your Personal Information when you interact with our Website through that browser and on that device.

When we receive a privacy control signal, we may also process it in a frictionless manner, which prohibits us from: (a) charging you a fee or requiring any valuable consideration; or (b) changing your experience with our products and services. We will also display a notification, pop-up, or other indicator to inform you of your choice to opt-out of the “sale” or “sharing” of your personal information. You may configure the privacy control signal to operate in a frictionless manner by consulting the documentation for your browser or plug-in that provides the privacy control signal.

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

We do not collect any Sensitive Personal Information.

11. Personal Information Retention Periods

We will retain your personal information only for as long as necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws. In general, this means that we store your personal information for as long as is required to deliver our services, except where we have a lawful basis for saving it for an extended period of time.

However, we may 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; or



- when necessary to help ensure the security and integrity of our Website and IT systems.

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

12. Changes to This CPRA Privacy Addendum

Umicore reserves the right to amend this California Privacy Addendum at our discretion and at any time. When we make changes to this California Privacy Addendum, we will post the updated addendum on the Website and update the addendum's effective date. **Your continued use of our Website or interactions with us following the posting of changes constitutes your acceptance of such changes.**

13. Contact Information

If you have any questions or comments about this California Privacy Addendum, the ways in which Umicore collects and uses your information described above and in the Privacy and Cookie Notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Email: data_protection@umicore.com.

