

# Privacy Policy

## Revised AK Tube LLC Privacy Policy: Effective May 25, 2018

AK Tube LLC, a subsidiary of AK Steel Holding Corporation, (“AK Tube”, “us”, “we”, or “our”) operates and controls this website (the “Site”). At AK Tube, your privacy is important to us. We are committed to maintaining the confidentiality, security and accuracy of your personally identifiable information. This Privacy Policy (the “Privacy Policy”) applies to the Site and on-line services owned or operated by AK Tube or by its service providers, and describes the information that we collect, how we use it and how and under what circumstances we share that information. We also explain what choices you can make about the way your information is collected and used.

This Privacy Policy applies to all visitors to our Site, our customers, and any others who access or use our products and services. This Privacy Policy does not create or confer on any individual or on AK Tube any rights, or impose on AK Tube any obligations beyond any rights conferred or obligations imposed by applicable law.

WHEN YOU ACCESS OUR WEBSITE, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, YOU SHOULD DISCONTINUE ACCESSING OUR WEBSITE AND USING OUR SERVICES.

If you have questions not answered in this policy, our Privacy Officer may be contacted directly at [privacyofficer@aksteel.com](mailto:privacyofficer@aksteel.com).

## Information We Collect

It is not necessary for you to supply any Personal Data when you visit our Site. However, when you register with our Site, we typically collect information that you voluntarily provide that personally identifies you or others (“Personal Data”) such as your name, home address, email address and any other information you provide to us. Additionally, when you visit our Site we automatically collect information that does not personally identify you or others (“non-personally identifiable information”).

**Personal Data:** Personal Data is a legal term that describes information that identifies a particular person and has special meaning under European Union law. For purposes of the EU’s General Data Protection Regulation (GDPR) personal data is any information that can identify you, either directly or indirectly, such as a name, an identification number, your IP address, data about your location, or information about your physical, physiological, genetic, mental, economic, cultural or social identity. Examples include:

- From employment applicants, we or our service provider will collect contact and identification information, such as name, address, telephone number, e-mail address, date and place of birth, and driver’s license number and employment and income information;

- From our customers, we or our service provider will collect information on products and services that you purchase, your credit and financial information such as billing and credit history or payment history; and
- Customer relationship information, such as customer service requests.

We do not automatically collect your Personal Data unless and until you have shared it with us. This Policy does not apply to information about our business customers that are not natural persons.

**Non-Personally Identifiable and Technical Information:** Whenever you use a website, mobile application, or other internet service, certain information is created and retained by the website or application. This happens with our Site as well. We collect technical information that does not personally identify you when you use our Site, or information that has been made anonymous, such as:

- Log data: Our servers automatically record information when you use our Site, such as your IP address, the type of browser you are using and its settings, the third party website you visited immediately prior to accessing our Site, the operating system you are using, the domain name of your Internet service provider, the search terms you use on our Site, the specific Site pages you visit, type of product selected, the brand, order, and product identifications, and the duration of your visits.
- Cookie data: Like many Sites, we use “cookies” to obtain certain types of information when your web browser accesses our Site. “Cookies” are small text files that we transfer to your computer's hard drive or your Web browser memory to enable our systems to recognize your browser and to provide convenience and other features to you, such as recognizing you as a frequent user of our Site. Some of the cookies we use are associated with your account with us (including Personal Data about you) if you have one, and other cookies are not.

We may use “session cookies” (cookies that last until you close your browser) or “persistent cookies” (cookies that last until you or your browser delete them). Examples of the information we collect and analyze from cookies include your activity on our Site, including the URL you come from and go to next (whether this URL is on our site or not). Remember that the cookies that we use do not contain and are not tied to Personal Data.

If you are concerned about the storage and use of cookies, you may be able to direct your internet browser to notify you and seek approval whenever a cookie is being sent to your Web browser or hard drive. You may also delete a cookie manually from your hard drive through your internet browser or other programs. Please note, however, that some parts of our Site will not function properly or be available to you if you refuse to accept a cookie or choose to disable the acceptance of cookies.

We may also collect information pertinent to the marketing of our products and services. This information may include marketing channels, User Market IDs (Centerpoint, TNMP, etc.), Site brands and product names, contract terms, financial information and other information.

## How We Use Information We Collect

**Personal Data: We will only use your personal data for the reasons we told you about when we collected it.** AK Tube will process (collect, store and use) the information you provide in compliance with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and will not keep it for longer than is necessary. We are required to retain certain information in accordance with applicable law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held longer depending on individual business needs.

AK Tube uses Personal Data it collects to allow us to evaluate your employment application, to provide the products and services you have chosen, or to manage and develop our business and operations, including:

- Establishing, managing and terminating business relations with you;
- Reviewing the products and services that we provide to you;
- Informing you of our products and services other than those that you have specifically requested;
- Informing you of products and services carefully selected third parties may wish to offer you;
- Responding to your comments or requests for information;
- Protecting us against error, fraud, theft, and damage to our goods and property;
- Enabling us to comply with applicable law or regulatory requirements; and
- Any other reasonable business purpose to which you consent.

**Email communications:** If you send us an email with questions or comments, we may use your email address to respond to your questions or comments, and we may save your questions or comments for future reference. We may email you when:

- You have applied for employment with us;
- You request information about our company;
- It relates to purchases you have made from us (e.g., product updates, customer support, etc.);
- We are sending you information about our other products and services; or
- You consented to being contacted by email for a particular purpose.

**Non-personally Identifiable Information:** We use your non-personally identifiable information in a variety of ways, including to help analyze Site traffic, understand customer needs and trends, carry out targeted promotional activities, and to improve our products and services. We may use non-personally identifiable information by itself or aggregate it with similar

information we have obtained from others. We may share your non-personally identifiable information with our affiliates and other third parties to achieve these objectives.

We reserve the right to use IP addresses to identify a visitor when we feel it is necessary to enforce compliance with our Site's Terms of Use, or to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Site, or other users; or (d) in an emergency to protect the health and safety of our Site's users or the general public.

Preference Based Advertising, Analytics, and Services: We do not currently share information that we collect for preference based advertising purposes and we do not currently have any plans to do so through this Site. However, if we do in the future work with third parties then we will do so in accordance with this section and you can opt out as explained below. Such third parties may include third party advertising networks and website analysis firms who use cookies and web beacons to collect non-personally identifiable information when you visit our Site and third party sites. The non-personally identifiable information, collected through cookies and/or web beacons, including your IP address, web browser, pages viewed, time spent on pages, and links clicked, is often used by these advertising networks to serve you with advertisements, while you are on our Site and/or on third party sites, that better reflect your preferences and needs. This information may be used by AK Tube and these third parties to analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our products and services, and better understand your online activity. For more information on how this type of advertising works, go to <http://www.aboutads.info/>.

Opting Out: If you do not wish to participate in preference based advertising via these third party advertising networks, go to <http://www.aboutads.info/> and follow the simple opt-out process. A couple of important notes about this opt-out tool: (1) it includes all the advertising networks that we may work with, but also many that we do not work with; and (2) it may rely on cookies to ensure that a given advertising network does not collect information about you ("Opt-out Cookies"). Therefore, if you use or buy new computer equipment, change web browser or delete these Opt-out Cookies, you may need to perform the opt-out task again.

## How and When We Share Information

**Your consent:** By using our products and services, you consent to our sharing your Personal Data with our partners and affiliates as necessary to fulfill your order or to perform the services you have requested we perform.

For certain types of personal data, we may use the data for certain described purposes at the time you provided it. You may withdraw your consent at any time. When you give us your consent, you are giving us permission to process your personal data specifically for the purposes identified. Where we ask you for additional personal data, we will always tell you why and how the information will be used.

You may withdraw consent at any time by sending an email to [privacyofficer@aksteel.com](mailto:privacyofficer@aksteel.com), or by sending a letter to:

Privacy Officer  
AK Steel Corporation  
9227 Centre Point Drive  
West Chester, OH 45069

**Third Party Providers:** We may use third parties to assist in processing your employment applications, fulfilling purchases of our products, or providing other important information to you. We require all such services providers to act in compliance with this Privacy Policy. We may also share your Personal Data with third parties, including our affiliates, or with employees, contractors, consultants and other parties (including other members of the AK Steel family of companies) who require the information to assist us to establish, maintain and manage our business relationship with you. Further, we may share your Personal Data and non-Personal Data with our partners and affiliates to promote other services to you that you might like or to show you ads in which you might be interested.

**Social Sharing:** Our Site may offer social sharing features or other integrated tools, which let you share actions you take on our Site with other media, and vice versa. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the third party that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the third parties that provide these features.

**Email Communications:** We may share your email contact information with our partners to assist with marketing our products and services. You may unsubscribe from receiving future commercial email communications from us by clicking the "unsubscribe" link included at the bottom of any marketing emails we send, or by emailing us as provided in the "Contact Us" section below. However, we reserve the right to send you transactional emails such as customer service communications in connection with the products you have purchased. For security reasons, we do not recommend that you send Personal Data, such as passwords, social security numbers, or bank account information, to us by email.

**Transfer of Assets:** We do not sell or lease Personal Data or provide a list of our customers to third parties. However, as we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all (or substantially all) of our assets, the Personal Data and non-Personal Data we have about you will be transferred to and used by this acquiring entity. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

**Legal Necessity:** Notwithstanding anything herein to the contrary, we reserve the right to disclose any personally identifiable or non-Personal Data about you if we are required to do

so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, or our Site; or (d) in an emergency to protect the health and safety of our Site's users or the general public.

## Your Rights as a Data Subject

You have important rights that you may exercise to protect your personal data. You may access those rights at any time by contacting us at [privacyofficer@aksteel.com](mailto:privacyofficer@aksteel.com).

You have the following rights concerning your personal data that we hold and process that you can exercise at any time:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to judicial review: in the event that AK Tube refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the process below.

All of the above requests will be forwarded on to other parties holding and processing your data where appropriate.

AK Tube may require the following forms of ID when information on your personal data is requested: Passport, Driver License, Birth Certificate, or any other means by which AK Tube can reasonably confirm your identity.

## What Choices Do You Have About Our Use of Your Information?

Our goal is to provide you with simple and meaningful choices about how your information is used. If you are a customer, you control your choices by your selections of our product and services.

**Accuracy of Personal Data:** It is important that the Personal Data AK Tube holds about you is accurate and current. AK Tube requires you to keep us informed of changes to any Personal Data. If your registration information changes, you can execute changes to your profile on our Site where you registered. We take reasonable steps to verify your identity prior to honoring any such requests to help protect your privacy and security.

**Accessing Your Personal Data:** If you want to know what Personal Data AK Tube holds about you or wish to change Personal Data that is inaccurate or out of date, or to withdraw your consent to the use of your Personal Data, please contact us at the address below. It may not always be possible to completely remove or modify information in our databases, although we will make reasonable efforts to do so upon your request. We do not control how our partners retain, store and destroy data they have accessed in connection with assisting with providing our services. You should check their websites for more information on their practices.

**Do Not Track Disclosures:** Certain browsers may offer you the option of providing notice to websites that you do not wish for your online activities to be tracked for preference based advertising purposes (“DNT Notice”). Some browsers are, by default, set to provide a DNT Notice, whether or not that reflects your preference. Providing DNT Notice is often touted as a means to ensure that cookies, web beacons and similar technology are not used for preference based advertising purposes – that is, to restrict the collection of information your online activities for advertising purposes. Unfortunately, given how preference-based advertising works, DNT Notices may not effectively accomplish this goal. For this and a variety of other reasons, with respect to our Site, we do not take any particular action based on browser based DNT Notices. However, we do not use third-party advertisers or engage in behavioral marketing data collection for resale. Rather, if you do not wish to participate in preference based advertising activities, you should follow the simple [opt-out process](#) identified above.

## Under What Circumstances will AK Tube Contact Me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

## Your California Privacy Rights

Residents of the State of California, under certain provisions of the California Civil Code, have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed certain Personal Data as defined under California law during the preceding year for third party direct marketing purposes. You are limited to one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. You may request the

information in writing at the address noted below. You may learn more about your rights under California's privacy laws at <http://www.privacyprotection.ca.gov>).

## Safeguarding Personal Data

AK Tube will endeavor to safeguard Personal Data using methods that are appropriate to the sensitivity of the information. We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the Personal Data under our control. However, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your Personal Data. In the unfortunate event that your information is compromised, we may notify you by e-mail to the last e-mail address you have provided us in the most expedient time reasonable under the circumstances. We may delay notification as necessary while we take measures to determine the scope of the breach and restore reasonable integrity to our system as well as for the legitimate needs of law enforcement. From time to time we evaluate new technology for protecting information, and when appropriate, we upgrade our information security systems.

## Privacy of Children's Information

Our Site is not directed to children. We do not sell products or services for purchase by children. We will not knowingly collect Personal Data from children. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed Personal Data to us, please contact us at the email address below. A parent or guardian of a child under the age of 13 may review and request deletion of such child's Personal Data as well as prohibit the use of that information.

## Linked Sites

This Policy does not apply to your use of unaffiliated websites to which our Site is linked. AK Tube is not responsible for the privacy practices or the content on linked sites. We recommend that you carefully read the privacy policies of each site you visit.

## Sole Statement

This Privacy Policy as posted on this Site is the sole statement of our privacy policy with respect to this Site, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy to the Site.

## Contacting Us

To get more information about AK Tube's Privacy Policy, or if you (a) have questions or comments about our Privacy Policy; (b) wish to make corrections to any Personal Data you



have provided; (c) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (d) wish to withdraw your consent to sharing your Personal Data with others, contact us in writing at the following address:

<b>Privacy Officer Contact Details</b>	
Address line 1:	AK Steel Corporation 9227 Centre Point Drive West Chester, OH 45069
Email	Privacyofficer@aksteel.com
<b>Supervisory Authority Contact Details</b>	
Name	Dutch Data Protection Authority
Address	Autoriteit Persoonsgegevens Postbus 93374 2509 AJ DEN HAAG
Fax	(+31) - (0)70 - 888 85 01
Phone	(+31) - (0)70 - 888 85 00

## Revisions to this Privacy Policy

AK Tube may from time to time make changes to this Privacy Policy to reflect changes in legal or regulatory obligations or changes in the manner in which we deal with Personal Data. We will post any revised version of this Privacy Policy on our website. Any changes will be effective on the effective date stated in the revised Privacy Policy. If there are significant changes we may provide more prominent notice or obtain your consent as required by law. If you do not wish to accept the changes, you should cease using the Site. Your continued use of the Site after we have posted a revised Privacy Policy indicates your agreement to the revisions.

This Privacy Policy was last updated on May 25, 2018.