



## HOWMET AEROSPACE INC. U.S.-EU PRIVACY SHIELD PRIVACY NOTICE NON-AFFILIATED EU INDIVIDUALS

Howmet Aerospace Inc., on behalf of itself and its controlled US subsidiaries (collectively “Howmet Aerospace”) recognizes and respects the privacy rights of individuals with regards to Personal Data the company obtains about them. Howmet Aerospace complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the European Union (“EU”), European Economic Area (“EEA”) or United Kingdom (“UK”). Howmet Aerospace has certified that it adheres to the Privacy Shield Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. Howmet Aerospace's Privacy Shield certification can be found at [www.privacyshield.gov/list](http://www.privacyshield.gov/list). For more information about the Privacy Shield Principles, please visit [www.privacyshield.gov](http://www.privacyshield.gov). For more information about Howmet Aerospace's processing of Non-Affiliated EU Individual Personal Data with respect to information collected on its websites, please visit Howmet Aerospace's Online Privacy Notice or other privacy notices published by the company.

**BACKGROUND:** These privacy principles consolidate earlier principles issued under previous certifications by Howmet Aerospace and expand the scope.

**SCOPE:** These principles apply to all Non-Affiliated EU Individual Personal Data received by Howmet Aerospace from the EU, EEA or UK under Howmet Aerospace’s consolidated Privacy Shield certification.

### DEFINITIONS

**Personal Data:** Personal Data means any information, including Sensitive Information, which is (i) about an identified or identifiable individual, (ii) received by Howmet Aerospace in the U.S. from the EU, EEA or UK, and (iii) recorded in any form.

**Sensitive Data:** Sensitive Data is Personal Data treated in European Union and United Kingdom data protection laws as posing special risks to individuals, such as information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health, or sex life. Other categories of Personal Data subject to special protections in some European Union countries and the UK include information about criminal history, civil judgments, administrative sanctions, government security measures, government-issued ID numbers, biometric data, genetic data, geo-location data, personality profiling, and information in the context of “whistleblowing.”

**Data Controller:** A Data Controller is a party or entity that determines the purposes and means of the processing of Personal Data. A company functions as a Data Controller when it decides how such data is to be used, and then uses that data accordingly.

**Data Processor:** A Data Processor is a party or entity that processes Personal Data on behalf of a Data Controller. A company functions as a Data Processor when it acts as an agent of another company, following its instructions as to how that data should be handled and processed.

**Non-Affiliated EU Individual:** A Non-Affiliated EU Individual means any natural person who is located in the EU, EEA or UK, but excludes any individual acting in his or her capacity as an Employee of Howmet Aerospace or its subsidiaries and affiliates.

### HOWMET AEROSPACE’S ROLES IN HANDING PERSONAL DATA

For some Personal Data covered by these principles, Howmet Aerospace acts as a Data Controller, making decisions about the purposes and means of processing of the data received from the EU, EEA or UK, and then using the data for those purposes. For other Personal Data, Howmet Aerospace acts as a Data Processor, acting on instructions from a Data Controller, including maintaining data in data centers in the U.S. solely on behalf of its European subsidiaries and affiliates.

## APPLICABLE PRINCIPLES

A full statement of these principles, summarized below, may be found on the Privacy Shield website of the U.S. Dept. of Commerce provided above.

### Types of Personal Data Howmet Aerospace Collects

Howmet Aerospace obtains Personal Data, such as contact information, in connection with maintaining its customer relationships and providing products and services to customers. Howmet Aerospace also obtains Personal Data of its suppliers' representatives and consultants, such as contact information, financial statements and reputational data. Howmet Aerospace uses this information to manage its relationships with its suppliers and consultants and comply with applicable law or legal requirements. In addition, Howmet Aerospace collects Personal Data directly from Non-affiliated EU Individuals. This collection occurs, for example, when a individual visits Howmet Aerospace's websites and provides Personal Data to the company. The company may use this information to:

- Provide products and services;
- send promotional materials or other communications;
- communicate with customers about, and administer their participation in, special events, programs, offers, surveys and market research;
- respond to customer inquiries;
- perform data analyses (including anonymization and aggregation of Personal Data);
- operate, evaluate and improve the company's business (including developing new products and services; enhancing and improving the company's products and services; managing the company's communications; analyzing the company's products, services and communications; and performing accounting, auditing and other internal functions);
- management of customer services including management of negotiations, contracts, transactions, and customer accounts, budgeting, accounting, maintaining records related to customers financials analysis;
- protect against, identify and prevent cybersecurity and other security events, espionage, fraud and other unlawful activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards and the company's policies.

Howmet Aerospace also may use the information in other ways for which the company provides specific notice at the time of collection. The types of Personal Data Howmet Aerospace collects in connection with these activities includes:

- contact information (such as name, postal address, telephone number and email address);
- login credentials for the company's websites;
- photograph, electronic signature, and acknowledgements of company policy;
- other Personal Data submitted by current or prospective suppliers and subcontractors, such as Social Security number, federal tax ID number, and civil and criminal court history;
- bank account and financial details; and
- other Personal Data found in content that Non-affiliated Individuals provide.

Howmet Aerospace's privacy practices regarding the processing of Non-affiliated EU Individual Personal Data comply with the Privacy Shield Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability.

### 1. Notice

Howmet Aerospace provides information in this Notice and the company's Online Privacy Notice about its Non-Affiliated EU Individual Personal Data practices, including the types of Personal Data Howmet Aerospace collects, the types of third parties to which Howmet Aerospace discloses the Personal Data and the purposes for doing so, the rights and choices Non-affiliated EU Individuals have for limiting the use and disclosure of their Personal Data, and how to contact Howmet Aerospace about its practices concerning Personal Data. Privacy notices pertaining to specific data processing activities also may contain relevant information.

### 2. Choice

Howmet Aerospace generally offers Non-affiliated EU Individuals the opportunity to choose whether their Personal Data may be (i) disclosed to third-party Controllers or (ii) used for a purpose that is materially different from the purposes for which the information was originally collected or subsequently authorized by the relevant Non-affiliated EU Individual. To the extent required by the Privacy Shield Principles, Howmet Aerospace obtains opt-in consent for certain uses and disclosures of Sensitive Data. Non-affiliated EU Individuals may contact Howmet Aerospace as indicated below regarding the company's use or disclosure of their Personal Data. Unless Howmet Aerospace offers Non-affiliated EU Individuals an appropriate choice, the company uses Personal Data only for purposes that are materially the same as those indicated in this Notice or the company's Online Privacy Notice.

Howmet Aerospace may disclose Non-affiliated EU Individual Personal Data without offering an opportunity to opt out, and may be required to disclose the Personal Data, (i) to third-party Data Processors the company has retained to perform services on its behalf and pursuant to its instructions, (ii) if it is required to do so by law or legal process, or (iii) in response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements. Howmet Aerospace also reserves the right to transfer Personal Data in the event of an audit or if the company sells or transfers all or a portion of its business or assets (including in the event of a merger, acquisition, divestiture, joint venture, reorganization, dissolution or liquidation).

### **3. Onward Transfer**

This Notice and Howmet Aerospace's Online Privacy Notice describe Howmet Aerospace's sharing of Non-affiliated EU Individual Personal Data.

Except as permitted or required by applicable law, Howmet Aerospace provides Non-affiliated EU Individual with an opportunity to opt out of sharing their Personal Data with third-party Data Controllers. Howmet Aerospace requires third-party Data Controllers to whom it discloses Non-affiliated EU Individual Personal Data to contractually agree to (i) only process the Personal Data for limited and specified purposes, (ii) provide the same level of protection for Personal Data as is required by the Privacy Shield Principles, and (iii) notify Howmet Aerospace and cease processing Personal Data (or take other reasonable and appropriate remedial steps) if the third-party Data Controller determines that it cannot meet its obligation to provide the same level of protection for Personal Data as is required by the Privacy Shield Principles.

With respect to transfers of Non-affiliated EU Individual Personal Data to third-party Data Processors, Howmet Aerospace (i) enters into a contract with each relevant Data Processor, (ii) transfers Personal Data to each such Data Processor only for limited and specified purposes, (iii) ascertains that the Data Processor is obligated to provide the Personal Data with at least the same level of privacy protection as is required by the Privacy Shield Principles, (iv) takes reasonable and appropriate steps to ensure that the Data Processor effectively processes the Personal Data in a manner consistent with Howmet Aerospace's obligations under the Privacy Shield Principles, (v) requires the Data Processor to notify Howmet Aerospace if the Data Processor determines that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles, (vi) upon notice, including under (v) above, takes reasonable and appropriate steps to stop and remediate unauthorized processing of the Personal Data by the Data Processor, and (vii) provides a summary or representative copy of the relevant privacy provisions of the Data Processor contract to the Department of Commerce, upon request. Howmet Aerospace remains liable under the Privacy Shield Principles if the company's third-party Data Processor onward transfer recipients process relevant Personal Data in a manner inconsistent with the Privacy Shield Principles, unless Howmet Aerospace proves that it is not responsible for the event giving rise to the damage.

### **4. Security**

Howmet Aerospace takes reasonable and appropriate precautions, including administrative, technical, personnel, and physical measures, to safeguard Personal Data against loss, misuse, theft, and unauthorized access, disclosure, alteration, and destruction. Howmet Aerospace's security policies, operating procedures, and technical controls, where applicable, generally adhere to commonly accepted standards for security of networks, infrastructure, applications, and data.

### **5. Data Integrity**

Howmet Aerospace limits its collection of Personal Data to that which is relevant for the intended business and legal purposes. Howmet Aerospace does not use the data in a way that is incompatible with the purposes for which it was



collected or subsequently authorized by the individual. To the extent necessary for those purposes, Howmet Aerospace takes reasonable steps to ensure that Personal Data is reliable for its intended use, accurate, complete, and current.

## **6. Access**

Howmet Aerospace provides individuals an opportunity to access Personal Data about them and to correct, amend, or delete that information where it is inaccurate, out-of-date or irrelevant, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy, or where the rights of persons other than the individual would be violated. Non-affiliated EU Individuals may request access to their Personal Data by contacting Howmet Aerospace as indicated below.

## **7. Enforcement**

Howmet Aerospace has mechanisms in place designed to help assure compliance with the Privacy Shield Principles. Howmet Aerospace conducts an annual self-assessment of its Non-affiliated EU Individual Personal Data practices to verify that the attestations and assertions the company makes about its Privacy Shield privacy practices are true and that the company's privacy practices have been implemented as represented and in accordance with the Privacy Shield Principles.

Non-affiliated EU Individuals may file a complaint concerning Howmet Aerospace's processing of their Personal Data. Howmet Aerospace will take steps to remedy issues arising out of its alleged failure to comply with the Privacy Shield Principles. Non-Affiliated EU Individuals may contact Howmet Aerospace as specified below about complaints regarding the company's Non-Affiliated EU Individual Personal Data practices.

If a Non-Affiliated EU Individual's complaint cannot be resolved through Howmet Aerospace's internal processes, Howmet Aerospace will cooperate with JAMS pursuant to the JAMS International Mediation Rules, available on the JAMS website at: [www.jamsadr.com/international-mediation-rules](http://www.jamsadr.com/international-mediation-rules). JAMS mediation may be commenced as provided for in the relevant JAMS rules. The mediator may propose any appropriate remedy, such as deletion of the relevant Personal Data, publicity for findings of noncompliance, payment of compensation for losses incurred as a result of noncompliance, or cessation of processing of the Personal Data of the Non-affiliated EU Individual who brought the complaint. The mediator or the Non-affiliated EU Individual also may refer the matter to the U.S. Federal Trade Commission, which has Privacy Shield investigatory and enforcement powers over Howmet Aerospace. Under certain circumstances, Non-affiliated EU Individual also may be able to invoke binding arbitration to address complaints regarding Howmet Aerospace's Privacy Shield compliance, not resolved by any of the other Privacy Shield mechanisms. For more information on binding arbitration, see U.S. Department of Commerce's Privacy Shield Framework Annex I (Binding Arbitration): <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

## **POINT OF CONTACT**

To contact Howmet Aerospace with questions or concerns about this Notice or Howmet Aerospace's Non-Affiliated EU Individual Personal Data practices:

Write to:

Barry Lombarts  
Data Protection Officer  
Howmet Aerospace Inc.  
Taxandriaweg 12c  
5142 PA Waalwijk  
The Netherlands

or

Email: [privacy@howmet.com](mailto:privacy@howmet.com)

**Privacy Shield Notice – Non-Affiliated Individuals**

**Effective July 15, 2020**

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**Howmet Aerospace Inc. and its controlled U.S. subsidiaries**