

PRIVACY POLICY

OF

AIM Metals & Alloys, Inc., its affiliates and subsidiaries (“AIM”)

DATE OF LAST MODIFICATION

August 1, 2019

At AIM, our customers’ privacy is paramount. AIM does not collect any personally identifiable information about its Site visitors unless such information is submitted voluntarily, in which case it will act in a responsible manner to protect your personal information. The privacy practices described in this document (the “**Privacy Policy**”) apply to Personally Identifiable Information (as defined below) that we collect in connection with all products, services and website(s) (collectively, “**the Site**”) offered by AIM. By visiting the Site you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree, please do not use or access the Site. AIM reserves the right to change this Privacy Policy without prior notice. Any changes to our Privacy Policy will become effective upon our posting of the revised Policy on the Site. Use of the Site following such changes constitutes your acceptance of the revised Privacy Policy in effect at the time.

For those of you accessing this website from the European Union, AIM, a Canadian-based company having its headquarters at 9100 boul. Henri Bourassa East, Montreal, QC, H1E 2S4, Canada is the responsible body and controller as defined by data protection laws:

General Data Protection Regulation (“GDPR”) Compliance:

When contacting individuals who reside in the European Union, AIM complies with the GDPR. AIM is wholly committed to upholding your personal rights under GDPR as evidenced herein and allows you to:

- i. obtain information on how AIM handles your personal data (as defined at Art. 4(1)(1) of the GDPR) and documents containing any personal data;
- ii. request that AIM corrects or updates inaccurate personal data;
- iii. erase personal data held by AIM that is no longer necessary in relation to the purposes for which it was collected or if you object to its collection or if it may have been unlawfully processed by AIM;
- iv. restrict processing by AIM to storage only where you oppose the deletion of your personal data and prefer restriction of processing instead or where you object to the processing by AIM on the basis of legitimate interests;
- v. to transmit personal data that you submitted to us back to you or to another organization in certain circumstances;
- vi. if we rely on your consent you may withdraw your consent at any time.

Should you have any questions or concerns about any of these rights please see below and/or contact the Data Protection Officer at datapolicies@aimsolder.com.

Personally Identifiable Information:

"Personally Identifiable Information" ("**PII**") is information that identifies you as an individual. AIM may collect Personally Identifiable Information in a number of ways. The two most common are during Site registration/personalization and/or product/service registration or enrollment. In many instances, you may visit the Site and use some of AIM’s services without providing PII. The PII requested may vary depending on which product, service or Site you are using or accessing. AIM asks for PII about you, such as name, email address,

postal address, telephone fax numbers, and job title. In addition to the PII we obtain at the initial stage of registration, we may ask you for PII at other times. In most cases, the more specific information you provide, the better we are able to personalize your experience with AIM. Non-Personally Identifiable Information" (or "**Non-PII**") is aggregated information, demographic information and any other information that does not reveal your specific identity. AIM and its service providers collect Non-PII which does not identify you, through "cookies," environmental variables, pixel tags and other technologies, your communications with us and other information you voluntarily provide.

AIM uses this information to better understand our customer base so that we may continually improve our products and services. AIM may use customer information to send you information and advertising about its products and services. For example, AIM may use your mailing address to send its marketing materials to keep you updated on its most current products and services and email addresses may be used to communicate information of interest to you about AIM. This includes general information, specific customer alerts from one of our subsidiaries or promotional emails. You may elect to opt out of any or all of these emails at any time by using the unsubscribe mechanism(s) made available. Emails may be sent to you by AIM or an authorized agent working for AIM. AIM reserves the right, but not the obligation, to contact you regarding changes to this Privacy Policy and other matters relevant to the Site.

Information Automatically Collected:

When you visit the Site, we automatically collect some information of a general nature. By collecting this information, AIM obtains a better understanding of your needs and preferences, products and services AIM can develop to meet those needs, and how well AIM's Site functions. Some of the information AIM automatically collects is necessary for the proper functioning of the Site, such as cookies (see below). AIM treats information collected by cookies and other technologies as Non-PII information. Similarly, to the extent that Non-PII is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

Links, Embedded Content, and Buttons:

AIM may keep track of how you interact with links across our services, including our email notifications. AIM does this to improve its services, provide information and advertising, and to analyze aggregate click statistics such as the amount of times a particular link was clicked on. The Site may contain links to other websites, content embedded in the Site that comes from or relates to other websites and services, and buttons from other websites and services such as social media websites like YouTube, Facebook, Twitter, LinkedIn, Instagram, etcetera. You can identify these social media buttons and the companies they represent by their logos.

Several third parties may use cookies or other tracking devices to collect and track information about you over time and across the Internet. AIM is not responsible for the privacy practices or the content of these other websites or their data collection practices. You should check the privacy policies of these other websites when providing PII or to find out what other information they collect from users, whether on their platform or website or in relation to links, buttons, or embedded media. It is reasonable to assume that a direct connection to the services of the provider is established and that at least your IP address and device-related information are collected and used. Service providers might also attempt to save cookies on the device.

NB: If you are logged into Facebook at the same time, Facebook may be able to identify you as a visitor to a specific page.

Subject to change without notice, AIM has embedded the social media buttons of the following companies on its Site:

LinkedIn Corporation

Privacy Policy: <https://www.linkedin.com/legal/preview/privacy-policy>

Twitter, Inc.

Privacy Policy: <https://www.twitter.com/privacy>

YouTube, LLC

Privacy Policy: <https://www.youtube.com/privacy>

Facebook, Inc.

Privacy Policy: <https://www.facebook.com/about/privacy/update/printable>

You might leave our site when your click on these links. We have no controls over third party websites, hyperlinks, advertisements or news feeds and information provided or collected by those sites. WE DISCLAIM ALL LIABILITY FOR THE COLLECTION, USE AND SHARING OF INFORMATION OR OTHER PRACTICES UNDER THE PRIVACY POLICY OF THIRD PARTIES, EXTERNAL SERVICE PROVIDERS, ANY EXTERNAL SOCIAL NETWORK PLATFORM, ANY THIRD PARTY GIVING ACCESS TO THE EQUIPMENT OR OPERATING SYSTEMS ON WHICH THE SITE IS AVAILABLE, AND ANY THIRD PARTY MANAGING A WEBSITE TO WHICH REFER A LINK APPEARING ON THE SITE. IT MAY BE THAT YOU HAVE RIGHTS THAT CAN BE USED AGAINST THOSE THIRD PARTIES; THEREFORE, YOU ARE ADVISED TO FIND OUT MORE BY CONSULTING THEIR PRIVACY POLICIES.

Cookies

Cookies are pieces of information that a website sends to your browser, which may then be saved on your device. Some of AIM’s pages contain cookies to understand what areas of AIM’s Site are of interest to you. If you do not want your browser to accept cookies, you can set it to decline them.

AIM uses cookies that fall into the categories below and usually have specific purposes of use: Cookie Category	Purpose of Cookies
Strictly Necessary	These are general purpose platform session cookies, used to maintain an anonymous user session by the server.

Performance Based	These cookies are used for web analytics to identify repeat visits by unique users, sometimes by assigning a randomly generated number as a client identifier. These cookies can also identify session and campaign data for analytics reports. By default, these cookies are set to expire after 2 years, although this is customizable by website owners.
Functionality	These cookies are used to store the visitor's geolocation, to record location and update a page share count, and track how often a user interacts with a web widget. These cookies can also identify unique identifiers for each page and test whether a browser is set to accept first party cookies.
Targeting	These cookies are used for advertising, audience targeting, and provide a data management platform which enables cookies to capture real time profiling of visitor interests.
Unknown	These cookies help manage availability and performance of software applications and the impact on user experience in the form of deep transaction tracing, synthetic monitoring, real user monitoring, and network monitoring. These cookies are also associated with managing sessions on load balanced servers, to ensure user requests are routed consistently to the correct server, usually the one that it is hosted on, but not always. These unknown cookies do not always have names or descriptions. They can change for each page on the site and different users will have different cookies. Different countries have different tags as well.

Communications:

AIM and its service providers may also collect Non-PII in connection with how you communicated with AIM, including country domain, language, browser type, and your use of a secure or insecure web page.

AIM may use PII about you in the following ways:

Personalized Experience: One of AIM’s goals in collecting PII is to provide you, with a personalized experience on its Site. This includes personalization services (such as content that can be personalized by both you and AIM), interactive communications (such as surveys and email contact with account representatives), and other types of services.

To Fulfill Requests: PII is used by AIM and its service providers to respond to your requests and fulfill the purpose for which the PII was provided, (e.g., to process and fulfill your product, service or support requests) and for administrative purposes (e.g., customer service). AIM may use PII to ensure you are directed to the right Site, product and/or service for you.

Communications: If you sign up, AIM may use PII to provide you with information about products or services offered by AIM, to recommend AIM products and services and to enable you to take advantage of the many features they offer. Should you no longer wish to receive such marketing communications, you may opt-out of such communications as set forth in below. AIM may use PII about you to send important information regarding the Site or changes to its terms, conditions, and policies and/or to send you other administrative and/or

operational communications. Because this information may be important to your use of the Site, products or services, you may not opt-out of receiving such operational communications.

Non-PII and mixed information

Since Non-PII does not personally identify you, AIM may use such Non-PII for any purpose. For example, AIM may use Non-PII to get a better understanding of its subscriber base by analyzing users' demographics, interests, and behaviour(s). AIM reserves the right to share such Non-PII with third parties for any purpose.

In some instances, AIM may combine Non-PII with PII (such as combining your name with your geographic location). If AIM combines any Non-PII with PII, the combined information will be treated by AIM as PII if it is so combined and used.

With whom does AIM share PII?

Business Partners: If you submit PII AIM may share your PII with any partner or company with which it has a relationship for any of the purposes set out in the immediately preceding sentence and/or for any of the purposes set out in the section above. AIM shall require that any such partner or company comply with the provisions of this Privacy Policy in dealing with any PII AIM shares with them. **AIM IS NOT RESPONSIBLE OR LIABLE FOR THE USE OF PII ABOUT YOU BY SUCH PARTNERS, COMPANIES AND/OR RESELLERS.**

Special Cases: AIM may also use and/or disclose PII in other special cases when we have reason to believe that using and/or disclosing this PII is necessary to identify, contact, or if AIM deems necessary, bring legal action (including action outside your country of residence) against someone who may be violating AIM's Terms of Service, end user license agreements and/or intellectual property rights. The same policy applies in cases where we believe an individual may be causing injury to or interfering with (either intentionally or unintentionally) AIM's rights or property, other users of an AIM Site or service, or anyone else that could be harmed by such activities. AIM may disclose or access PII when we believe in good faith that the law (including laws outside your country of residence) requires it, to comply with the legal process, to respond to requests from public authorities including public authorities outside your country of residence and for administrative and other purposes that we deem necessary to maintain, service, and improve our products and services, to protect our operations and to permit us to pursue available remedies or limit the damages that we may sustain. This includes exchanging PII with other companies and organizations for fraud protection and credit risk reduction.

Service Providers: AIM occasionally employs other companies and individuals to perform functions on its behalf. Examples include fulfilling orders, sending postal mail and email, removing repetitive PII from customer lists, ensuring accuracy of PII, analyzing data, providing marketing assistance, fulfilling purchases and processing credit card payments. AIM may share PII about you with third parties for the purpose of enabling these third parties to perform such functions.

Third Party Websites: AIM's Site may contain links to other websites. These websites may have privacy practices that differ from AIM's. This Privacy Policy does not apply to those sites. Therefore, should you submit information to any such third-party site your information is governed by the privacy policies specific to said sites.

Your choices regarding the use of PII

Should you no longer wish to receive marketing information, or if you would prefer that AIM not share PII about you, you may opt-out of receiving such marketing-related information and/or from such sharing by submitting a request to change your marketing preferences.

Alternatively, you may email AIM at datapolicies@aimsolder.com. In all cases, please include your registered address with your request. Please specify clearly which of the following choices you are opting out of:

- i. Receiving marketing-related emails from AIM;
- ii. Allowing AIM to share PII about you with AIM's affiliates for their marketing purposes; and/or
- iii. Allowing AIM to share PII about you with partners for their marketing purposes.

AIM will endeavour to comply with your request as soon as reasonably practicable. Please note that if you opt-out as described above, AIM will not be able to remove PII about you from the databases or third parties with which AIM has already shared PII about you. If you wish to cease receiving marketing-related e-mails from such third parties, please contact such third parties directly or utilize any opt-out mechanisms set forth in their respective privacy policies or marketing-related emails.

Right to Receive, Correct, Block, Delete, and Object to Stored Data

You have the right to receive information about the personal data AIM holds about you at any time. You also have the right to the correction, blocking, or (except for the prescribed storage of data for business purposes or as otherwise legally required) deletion of your personal data. Please contact your AIM representative if you wish to request this. The contact details are provided at the end of this document.

To ensure data blocking all times, data must be kept in a block file for control purposes. You can also demand the deletion of data as long as the data in question is not subject to any legal archiving obligation. If an obligation of this kind does exist, AIM will block your data upon request.

You can make changes to or revoke your consent to the storage of your data at any time by notifying AIM accordingly.

Access to Personal Information for Reviewing, Editing, and/or Removing

Should you wish to discuss this Privacy Policy and the information AIM collects, you may contact AIM at the address provided in this Privacy Policy. The Site is not intended to solicit, collect or maintain personally identifiable information from users under the age of thirteen (13). If you are a parent or guardian, please contact AIM if you believe information regarding a child has been collected by through the Site.

Changes to this Policy

This Privacy Policy may change from time to time. Most changes will be minor, however, there may be changes that are more significant. Where appropriate and possible, AIM will notify you of such changes by email. Any changes to our Privacy Policy will be posted on our website www.aimsolder.com so that you are always informed about the type of information we collect, how we use it, under what circumstances and, if applicable, to whom we disclose it.

Contact us

For any other questions please contact AIM, referencing Data Protection at via email datapolicies@aimsolder.com or by mail at:

Inside the EU:

AIM Solder Europe, Sp. z.o.o. Ltd.
Ul. *Papiernicza 7*
Lodz 92-312, Poland

Outside the EU:

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