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Subject	LEGAL		
Subtitle	California Employee Privacy Notice		
Issue Date	1/1/2023	Effective Date	1/1/2023
Applies to Employee Type	All Employees Who Are California Residents		
Applies to Business Unit	All U.S. Business Unit/Regions, Divisions, Corporate Offices and Service Centers		

I. INTRODUCTION AND PURPOSE

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (collectively referred to herein as the “CCPA” or “Act”) grants residents of the State of California (hereinafter “you” or “consumer”) certain privacy rights in their personal information. This Privacy Notice is intended to meet the requirements of the CCPA on behalf of Joseph T. Ryerson & Son, Inc. and its subsidiaries and divisions (collectively “Ryerson,” “us,” “we,” or “our”).

This Privacy Notice describes the categories of personal information that we collect, how we use your personal information how we secure your personal information, and when we may disclose your personal information to third parties.

This Privacy Notice only applies to residents of the State of California.

Additional information about our privacy practices and your rights under the CCPA can be found in our Online Privacy Policy at: <https://www.ryerson.com/privacypolicy>

II. PERSONAL INFORMATION

The CCPA defines personal information as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

We will only process your personal information in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

Personal information under the CCPA, however, does not include:

- Deidentified or aggregated consumer information.
- Publicly available information from federal, state or local government records.
- Information excluded from the scope of the CCPA:
 - (i) Medical or health information covered by the Health Insurance and Portability and Accountability Act of 1966 (“HIPAA”) and the California Confidentiality of Medical Information Act (“CMIA”) or clinical trial data.

(ii) Personal information covered by certain sector-specific privacy laws such as 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.

This chart identifies categories or examples of personal information covered by the CCPA:

Category	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, 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, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO

E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
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F. Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	NO
G. Geolocation data	Physical location or movements.	NO
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	YES
I. Professional or employment-related information	Current or past job history or performance evaluations.	YES
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))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	NO

III. PURPOSES FOR WHICH YOUR INFORMATION MAY BE USED

You should know that:

- We do not and will not sell your personal information.
- We will not share your personal information with third parties for marketing purposes.
- We will not use your personal information to make any automated decisions affecting you.

Ryerson collects the personal information identified in Section II above to operate, manage, and maintain our business, for our employment purposes, and to otherwise accomplish our business purposes and objectives, as more fully set forth below.

- To recruit employees, including to conduct employment related background screening and checks and to evaluate your suitability for employment or any continuation thereof.
- To pay employees and reimburse for expenses, including salary administration, payroll management, including calculation of salary, and any withholding for state or federal taxes, social security payments and any benefits offered or required by Ryerson, payment of expenses, to administer other compensation related payments, including assigning amounts of bonus payments to individuals, administration of departmental bonus pools and administration of stock option payments.
- To evaluate and permit your participation in any retirement plan offered by Ryerson in which you are eligible to participate under the terms of that plan and to administer your participation in and payments made to or from any plan.
- To evaluate and administer benefits, such as medical, dental, optical, commuter, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, insurance and accident management, and to pay or dispute claims.
- For possible inclusion in any affirmative action programs for veterans or others.
- To track the use of vacation, sick days, disability or leave policies.
- To assist you in case of emergency, including maintenance of contact details for you, and your dependents in case of personal or business emergency.
- To conduct performance-related reviews, including performance appraisals, career planning, skills monitoring, job moves, promotions and staff re-structuring.
- To ensure a safe and efficient working environment, which includes Ryerson actions relating to disciplinary actions, and code of conduct processes and investigations.
- To maintain security on Ryerson websites and internet connected assets, which includes hosting and maintenance of computer systems and infrastructure; management of Our software and hardware computer assets; systems testing, such as development of new systems and end-user testing of computer systems; training; and monitoring email and Internet access.
- To monitor eligibility to work in the U.S., which means monitoring and ensuring compliance of employees' ability to work in the U.S.
- To conduct healthcare-related services, including reviewing pre-employment and employment-related medical screenings for return-to-work processes and medical case management needs; determining medical suitability for particular tasks; identifying health

needs of employees to plan and provide appropriate services, including operation of sickness policies and procedures.

- To comply with applicable law or regulatory requirements, such as legal (state and federal) and internal company reporting obligations, including headcount, affirmative action, management information, demographic and Health, Safety, Security and Environmental reporting, defend or prosecute a lawsuit, administrative proceeding, or any type of legal, regulatory or administrative claim, challenge or dispute which may include responding to discovery requests involving your information.
- To communicate with you or a related third party such as our insurer, any benefits or claims administrator or your agent, broker or a claim administrator about the status, developments or the outcome or our legal analysis of the claim or dispute.
- To fulfill or meet the reasons you provided us the information, including to process your requests, transactions or payments and to prevent transaction fraud.
- For any purpose related to any of the foregoing.

IV. CATEGORIES OF THIRD PARTIES WITH WHOM WE MAY SHARE YOUR PERSONAL DATA

We do not sell, rent or otherwise disclose personal information we collect to third parties for monetary or other valuable considerations. We will only disclose your personal information to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the recruitment process, including third-party service providers who provide services to us or on our behalf. We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification and background checks.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal information consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes in accordance with our instructions.

V. DATA SECURITY

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal information against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal information to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

VI. DATA RETENTION

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

If you are offered and accept employment with Ryerson, the personal information we collected during the application and recruitment process will become part of your employment record, and we may use it in connection with your employment consistent with our employee personal information policies. If you do not become an employee, or, once you are no longer an employee of Ryerson, we will retain and securely destroy your personal information in accordance with our document retention policy and applicable laws and regulations.

VII. RIGHT TO REQUEST DELETION OF INFORMATION

Employees have the right to request the deletion of their personal information held by Ryerson. To request such a deletion, contact us by email at ryersonprivacypolicy@ryerson.com or by phone at (312) 292-5121. Upon receipt of a verifiable request, Ryerson will provide a formal response to the request within 10 business days and will accomplish deletion within 45 business days. Ryerson reserves the right to retain information that is reasonably necessary for our business or necessary in order to comply with any legal obligation.

VIII. QUESTIONS

We welcome any questions about our privacy practices and this notice. If you have any questions, please contact us by email at ryersonprivacypolicy@ryerson.com or by phone at (312) 292-5121. You can also review our full Privacy Policy at <https://www.ryerson.com/ccpa>.