



Arconic Corporation - Privacy Notice

Arconic Corporation and its subsidiaries and affiliates (collectively, “Arconic”, the “Company”, “we”, “us”, “our”), take your privacy seriously. This Privacy Notice describes how we collect, use, disclose, transfer across borders and otherwise handle (collectively, “process”) your personal information. This Notice also describes your choices regarding our handling of your personal information and how you may contact us regarding our privacy practices.

The term “personal information” as used in this Notice means, unless specified otherwise, any information related to or about an identified or identifiable natural person.

This Notice contains the following sections:

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1. Scope of this Notice

You may interact with Arconic online and offline for a variety of reasons. This Notice applies to the personal information we process when you visit our website <https://www.arconic.com/> as it may be modified, relocated, or redirected from time to time (the “Website”), and when you interact with us in other ways, such as when you use any of our services, communicate with us or attend an event that we host.

This Notice also applies to personal information the Company may collect from or about: (1) job applicants, in the course of applying for employment with the Company through Arconic’s careers site (“Applicants”); and (2) the corporate representatives of customers, vendors, suppliers, business partners and others for the purposes of conducting our own business, such as contracting and invoicing (“Business Contacts”). Except where this Notice refers to one or more categories of individuals in particular, this Notice applies to all categories of individuals listed above collectively.

Except with respect to Applicants, this Notice does not apply with respect to the personal information processed by the Company in our capacity as an employer, including personal information of the Company's current or former employees. Arconic maintains separate policies, if and to the extent required by law, with respect to our processing of personal information as an employer.

Identification of the Data Controller

Depending on where you are located, the "data controller" or "business" responsible for processing your personal information may be different. A full list of Arconic locations is available [here](#) and Arconic's data controller for any of its locations can be contacted at privacy@arconic.com.

Third-Party Sites

Our Website may include links to, and plug-ins from, sites or applications operated by third-parties ("Third-Party Sites"). Arconic does not control any Third-Party Sites and is not responsible for any personal information they may collect. The data collection practices of Third-Party Sites are governed by their privacy policies. If you choose to enter any Third-Party Site from our Website, please refer to that site's privacy policy to learn more about their processing of your personal information.

Children's Online Privacy Protection Act Compliance

We do not collect information from anyone under 16 years of age. The products and/or services we provide and our Website are directed towards individuals who are at least 16 years old. If you are under the age of 16, you are not authorized to use our Website.

2. Personal Information We Collect

The types of personal information we collect will vary depending upon the reason that you are interacting with us and may include the following, with examples that are not exhaustive:

- (1) Identifiers:** name, mailing address, email address, phone number.
- (2) Professional or Employment-Related Information:** employer or company name, job title, business contact information (business email address, mailing address and phone number) and other information necessary to manage the relationship between Arconic and your employer. For Applicants, this includes your employment history (e.g., previous employers and positions held, dates, locations, supervisors, responsibilities), educational history, languages spoken and skills, professional memberships, resume and cover letter information, references and information obtained from them and information you disclose through your LinkedIn profile.
- (3) Commercial Information:** records of products and services purchased from Arconic, sign up or attendee information related to Arconic events.

- (4) Internet or Other Electronic Activity Information:** IP address or unique device identifier, browser characteristics, language preferences, operating system details, referring URLs, length of visits or pages viewed. When you browse our Website, this also includes cookies and other information collected through technology, described further below and in the Company's [Cookie Notice](#).
- (5) Sensory or Monitoring Data:** voicemails, recordings of customer support service calls.
- (6) Marketing and Communications Preferences:** products you are interested in, marketing preferences, interactions with our marketing communications.
- (7) Communications Feedback or Other Information Provided to Us:** correspondence with us, social media interactions with our accounts, comments provided on feedback forms or surveys or information you provide to us voluntarily (forms you may complete when attending our conferences or information provided when you contact customer support services).
- (8) Background and Screening Information:** citizenship/residency status, security clearance information, passport or other government ID number, and date of birth, only where this information is (i) necessary for compliance with Arconic's legal and regulatory obligations; and (ii) we have obtained your consent, as appropriate.
- (9) Application Information for Applicants Only:** eligibility to work in the country where you are applying, salary expectations, information you provide during our application or interview process.
- (10) Criminal History as Part of Post-Offer, Pre-Employment Process Only:** we, or a third-party background check company under our direction, may check criminal history records for information about convictions, but only with your consent and to the extent permitted by applicable law.

Additional Information We Collect About Applicants

When you apply for a position in the U.S. or indicate the U.S. as a preferred location when registering your profile, you will have the opportunity to provide information about your protected classification (gender, race/ethnic origin and/or veteran status) for us to conduct equal opportunity monitoring. The provision of this information is voluntary. If you decline to provide this information, your application(s) will not be affected in any way. If you choose to provide this information, you consent to our using it for equal employment opportunity monitoring purposes. This information will be held and stored anonymously and will not be used to evaluate your application for employment or to infer any characteristics about you. If the Company conducts a post-offer medical examination or if you request an accommodation in connection with the hiring process, we may collect medical information about you.

Except as described above, we will not request or collect information about your health, race or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership,

sexual orientation, genetic information or biometric information through the application process unless the law requires us to do so.

Information Collected Automatically on the Website

When you use our Websites, we may collect certain information technologies such as cookies, web server logs, web beacons and JavaScript. For more information on how we collect and use this information, please review our [Cookie Notice](#).

3. Sources of Personal Information

We may collect personal information about you from the following sources, with examples that are not exhaustive:

- **Directly from you:** when you use our Website, request information, order or use our products or services, register for or attend an Arconic event or communicate directly with us. For Applicants, we may collect your personal information from a job application or during our application and interview process.
- **From your employer or representative:** for Business Contacts, we may collect your personal information your employer or a company with which you are affiliated to provide our products and services.
- **Affiliated companies:** when assisting other companies within the Arconic corporate group in providing you with our products and services.
- **From automated technologies:** cookies, recordings of calls to customer service.
- **Public internet sources:** social media, public profiles and other public online sources.
- **Public records:** court records, credentialing and licensing organizations. For Business Contacts, we may collect personal information from anti-fraud databases, sanctions lists, government agencies and other publicly available data sources.
- **Background check references and providers:** For Applicants, we may collect personal information about you from recruiters, job references or staffing agencies. We may also engage background check providers, post-offer but pre-employment, to verify previous employment, certifications, education, and identity, and, with your consent and to the extent permitted under applicable law, report on criminal history.

4. How We Use Personal Information

Depending on the nature of your interaction with Arconic (e.g., Business Contact, Applicant, or when using our Website), we may use the categories of personal information listed in Section 2 of this Notice for the following purposes, and based on the following legal bases (where such legal bases are required by applicable law for the processing of your personal information):

Category of Personal Information	Purposes of Use	Legal Basis
1, 2, 3, 4, 6, 7	To send you marketing information about our products and services, including notifying you of events.	To pursue our legitimate business interests in marketing our products and services, growing our business and managing our relationship with our customers, suppliers and you.
1, 2, 3, 4, 6, 7	To enhance your experience using our products and services and to personalize your online experience.	To pursue our legitimate business interests in maintaining and improving the quality of our Website, products and services
1, 2, 3, 4, 5, 6, 7	For customer support	To perform our obligations under our contract with you or the company you represent. To pursue our legitimate business interests in maintaining and improving the quality of our Website, products and services and managing our relationship with our customers, suppliers and you.
1, 2, 3, 4, 5, 6, 7, 8, 9	To administer and protect our business and our Website (including troubleshooting, analysis, testing, maintenance, support, reporting and hosting data and preventing fraud and abuse).	To pursue our legitimate business interests in maintaining and improving the quality of our Website and protecting our business. To comply with our legal obligations.
1, 2, 3, 4, 6, 7	To conduct customer analysis, market research and focus groups, including creation of promotional materials, gathering customer feedback and conducting customer satisfaction surveys	To pursue our legitimate business interests in maintaining and improving the quality of our Website, products and services.
1, 2, 3, 4, 6, 7, 8, 9, 10	In connection with a sale, merger or reorganization of our business	To pursue our legitimate business interests in corporate transactions and to protect our legal interests.
1, 2, 3, 4, 5, 6, 7, 8, 9, 10	To protect the rights, property, or safety of the Company, you or others, including to undertake anti-fraud, sanction, anti-money laundering and other checks to	To pursue our legitimate business interests in protecting our business. To comply with our contractual and other legal obligations and exercise the Company's rights or defend against legal claims.

	protect against fraudulent, suspicious or other illegal activities	
1, 2, 3, 4, 5, 6, 7, 8, 9, 10	For recordkeeping purposes and to ensure compliance with applicable laws and regulatory obligations.	To pursue our legitimate business interests in protecting our business. To comply with our contractual and other legal obligations.
1, 2, 4, 7, 8, 9, 10	To evaluate your qualifications or suitability for employment with Company and related recruiting purposes.	To determine whether to enter into an employment agreement with you, and (if hired), perform our obligation under that agreement. To pursue our legitimate business interests in hiring suitable personnel.

Your Consent

Where none of these legal bases applies, or when applicable law requires your consent to the processing described in this Notice, Arconic relies on your consent to do so. Under the data protection law of some jurisdictions, by providing your personal information to Arconic as data controller, you consent to our processing of your personal information as described in this Notice. As our business evolves, this Notice may change, so visit this page periodically to understand how your personal information will be handled. Where processing of your personal information requires explicit consent, for example, collecting your sensitive personal information in some jurisdictions, the Company will provide notice and request your explicit consent.

You are not obliged to provide your personal information to the Company. However, if you do not provide your personal information or otherwise decline to or withdraw your consent to the processing where your consent is required, the Company may not be able to: (1) provide you with certain services and may be required to terminate the services currently provided to you or the Company you represent; or (2) consider you for employment.

You may have the right under applicable law to withdraw your consent. For more information about this right, please refer to Section 9 of this Notice.

No Automated Decision Making

The Company does not use the personal information collected for automated decision-making, including profiling, to make hiring decisions or other similar decisions affecting individuals.

5. How We Disclose Personal Information

We do not and will not sell your personal information or disclose it to third parties for cross-context behavioral advertising (“sharing”). We may disclose personal information to the following categories of third parties for the following purposes:

- **Service Providers:** We may disclose your personal information to service providers to provide services to us or on our behalf and to assist us in meeting our business needs and contractual and legal obligations—for example, to host all or portions of the Site, to provide IT services, or for Applicants, to assist in the recruiting process or conduct pre-employment screening. Service providers will be permitted to process your personal information only for the purpose(s) for which it was disclosed to them and in accordance with the Company’s instructions.
- **Professional Advisers and Related Third Parties:** We may disclose personal information to lawyers to assist us with legal compliance, auditors, accountants or consultants to assist us in providing services to you or in otherwise conducting our business.
- **Corporate Affiliates:** Your personal information may be disclosed to subsidiaries and affiliates within Arconic’s corporate group to provide you with our products and services or provide you with information about their products and services.
- **Government Authorities or Administrative Agencies:** We may disclose your personal information to law enforcement, regulatory bodies or tax authorities.
- **Other Third Parties:** We may disclose your personal information to other third parties as follows, with examples that are not exhaustive;
 - **When Required by Law:** Response to subpoenas, court orders, other legal process or discovery requests in civil litigation.
 - **To Protect Rights, Property or Safety:** If we believe your actions violate applicable law or threaten the rights, property, or safety of the Company, our clients or others.
 - **In Corporate Transactions:** We may disclose and transfer your personal information to a subsequent owner or of our business in connection with a corporate merger, consolidation, bankruptcy, the sale of all or substantially all of our membership interests and/or assets or other corporate change(s).

The Company will make the disclosures described above only as permitted by applicable laws.

6. International Transfers of Personal Information

Due to the global nature of our business, we may transfer personal information to parties located in countries other than the one where you reside, including in the United States. We may transfer personal information internationally to our subsidiaries, affiliates, service providers, business partners and governmental or public authorities in another country in connection with the performance of our services. The laws of these countries may provide a different level of protection for personal information than the country where you reside.

We will, when required by applicable law, rely on approved mechanisms to lawfully transfer personal information across borders, such as standard contractual clauses or other model clauses approved for use by applicable data protection authorities. We generally will use Standard Contractual Clauses (“SCCs”), approved by the European Commission, as a legal mechanism for data transfers outside the European Union (EU) and the Addendum to the SCCs, approved by the United Kingdom’s (“UK”) Information Commission, for transfers outside of the UK. These clauses are contractual commitments between companies transferring personal

information, binding them to protect the privacy and security of the transferred personal information. Additional jurisdiction-specific information regarding cross-border data transfers may be found in Section 9.

7. How We Secure Personal Information

We use commercially reasonable practices to secure your personal information from being lost, accessed, used, modified, or disclosed by/to unauthorized persons. We also use commercially reasonable measures to validate the security measures of vendors who store personal information that may be provided to such vendors as part of the vendor services or products provided to Arconic. Despite our reasonable efforts, no security measure is perfect or impenetrable, so we do not guarantee the security of your personal information.

8. How Long We Retain Personal Information

Our retention periods for personal information are based on business needs and legal requirements, depending on the nature of your relationship with Arconic. We keep personal information for as long as is reasonably necessary for the purposes for which it was collected as explained in this Notice.

9. Additional Information Specific to Your Region

(1) Individuals Who Reside in California

This section applies only to residents of California in the United States (“California residents”), to the extent that Arconic’s processing of their personal information is subject to the California Consumer Privacy Act, as amended by the California Privacy Rights Act, (the “CCPA”). To the extent you provide Arconic with personal information about other California residents, you are responsible for providing this Notice to them.

Notice at Collection

Arconic collects the categories of personal information identified in Section 2 for the purposes identified in Section 4 and retains personal information for the period described in Section 8. We will not, sell your personal information or disclose it to third parties for cross-context behavioral advertising. In addition, we have no actual knowledge that we sell or share the personal information of individuals of any age, including the personal information of children under 16. We do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

Additional Information About Disclosures of Personal Information

We may disclose your personal information to third parties for the following “business purposes” as that term is defined in the CCPA and as a supplement to the disclosure described in Section 5:

- **Service Providers:** We may disclose personal information to service providers for the business purpose of performing services on the Company's behalf, as well as (a) helping to ensure security and integrity, (b) debugging, (c) short-term transient use, (d) internal research and (e) activities to maintain or improve the quality or safety of a service or device.
- **Professional Advisers and Related Third Parties:** We may disclose personal information to the professional services providers listed in Section 6 for the business purpose of auditing compliance with policies and applicable laws in addition to performing services on the Company's behalf.
- **Affiliated Companies:** We may disclose personal information to subsidiaries and affiliates within Arconic's corporate group for the business purposes of: (a) auditing compliance with policies and applicable laws, (b) helping to ensure security and integrity, (c) debugging, (d) short-term transient use, (e) internal research and (f) activities to maintain or improve the quality or safety of a service or device.

Note on Deidentified Information

Arconic may convert California residents' personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual ("Deidentified Information"). We maintain Deidentified Information in a deidentified form and do not attempt to reidentify it, except that we may attempt to reidentify the information solely for the purpose of determining whether the deidentification processes ensure that the information cannot be associated with the individual.

Your California Privacy Rights

Subject to applicable limitations and exceptions, California residents have the following rights under the CCPA:

- **Right to Know:** You have the right to submit a verifiable request for specific pieces of your personal information and for information about Arconic's collection, use, and disclosure of categories of your personal information.
- **Right to Delete:** You have the right to submit a verifiable request to delete personal information that Arconic has collected from you.
- **Right to Correct:** You have the right to submit a verifiable request to correct inaccurate personal information about you, taking into account the nature of the personal information and the purposes of processing the personal information.
- **Non-Discrimination:** Arconic will not unlawfully discriminate against you for exercising your privacy rights under the CCPA.

How to Exercise Your California Privacy Rights

- Arconic will respond to requests to know, delete and correct in accordance with applicable law(s) if it can verify the identity of the requestor. You can exercise these rights by:
 - Calling 412-992-2500
 - Completing the request form [available here](#)

How We Will Verify Your Request

If you submit a request to know, delete or correct, we verify your identity by matching personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (*e.g.*, a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

Authorized Agents

You may designate an authorized agent to exercise your rights. If an authorized agent submits a request on your behalf, the authorized agent must submit with the request a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity. Alternatively, you can provide a power of attorney compliant with the California Probate Code.

(2) Individuals Who Reside Outside the United States

If you reside outside of the United States, including in Canada, the European Union (“EU”), or the United Kingdom (“UK”) (collectively, “Non-U.S. Residents”), the following also applies to you:

Your Rights with Respect to Your Personal Information

You may have certain rights relating to your personal information, including sensitive personal information, subject to local data protection laws. Subject to any limitations and exceptions provided by the law applicable to your country of residence, you may have the right to:

- Request **access** to your personal information.
- Request that the Company **update, correct or delete** (the “right to be forgotten”) your personal information.
- **Withdraw your previously granted consent** to the processing of your personal information.
 - If the Company requests your consent to process your personal information and you do consent, you may use the contact information below to withdraw your

consent. Any withdrawal shall not affect the lawfulness of processing based on your consent before its withdrawal and the Company will continue to retain the information that you provided us before you withdrew your consent for as long as allowed or required by applicable law. If Company has an alternative lawful ground for processing your personal information without your consent, we may continue to do so.

- Request **restriction of processing** of your personal information in certain situations, such as while a dispute concerning the accuracy of personal information is being resolved.
- Request **data portability**.
 - Subject to certain limitations, the right to data portability allows you to obtain from the Company, or ask the Company to send to a third party, a copy of your personal information in electronic form.
- **Object to the processing** of your personal information based solely on the Company's legitimate interests. If you object in these circumstances, we will not process your personal information unless there is an overriding, compelling reason to continue to do so (for e.g., to establish, pursue or defend legal claims).

How to Exercise Your Privacy Rights

To exercise your rights described above, please submit a verifiable request to us by completing the request form [available here](#).

The Company will respond to such requests in accordance with applicable data protection law.

Additional Jurisdiction-Specific Information

If you believe that your personal information has been processed in violation of applicable data protection law, you may lodge a complaint with the data protection authority where you live or work, or where you believe the violation occurred.

10. Changes to the Notice

We review this Notice regularly and may make changes at any time to take account of changes in our business activities, legal requirements or how we process personal information. We will post updates on this website.

11. Contact Us

Should you have any questions or concerns you may have about this Privacy Notice, please contact us via email at privacy@arconic.com or in writing addressed to:

Arconic Corporation
Attn: Legal and Compliance
201 Isabella St., Pittsburgh, PA 15212