## MATERION

## PERSONAL INFORMATION PRIVACY NOTICE FOR MATERION CANDIDATES LOCATED IN THE EUROPEAN UNION

Materion Corporation and its subsidiaries and affiliated companies (collectively, **Materion**, we, us or our) care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data privacy laws.

#### Scope

This notice explains how your Materion employer (see attachment I), as data controller, as well as its parent company Materion Corporation and Materion Services Inc., with head offices at 6070 Parkland Blvd., Mayfield Heights, OH 44124, as data controllers, handle the personal information of employees, interns, former employees, dependents, beneficiaries, contractors, consultants, customers and temporary agency workers in the course of its human resources activities and for the business purposes laid down in this notice. We may amend this notice from time to time, should it become necessary to do so. This notice may also be supplemented by other statements as needed to comply with local requirements in the country where you live, or where employees' representation agreements exist.

#### **Collection and Use of Personal Information**

We may collect your personal information to administer our employment or contractual relationship with you and for the purposes specified below:-

- We may collect personal information, either directly from you or from third parties including public databases, social media platforms or recruitment companies.
- We may collect, use and transfer your personal information through automated and/or paper-based data processing systems.
- We have established routine processing functions (such as processing for regular payroll and benefits administration).
   We also process personal information on an occasional or *ad hoc* basis (such as when an employee is being considered for a particular new position, or in the context of changes to an employee's marital status).

We may collect the following types of personal information:

- Personal identification information, such as your Biographic information, including: name, surname, maiden name (if relevant), date of birth, city of birth, country of birth, gender, employee ID, marital status, parental status, home address, date of birth, gender, work-related photographs, and home or mobile phone numbers;
- Government-issued identification numbers, such as national ID for payroll purposes;
- Immigration, right-to-work and residence status;
- Family and emergency contact details;
- Job-related information, such as years of service, work location, employment ID, work record, vacation absences, and contract data;
- Educational and training information, such as your educational awards, certificates and licenses, vocational records and in-house training attendance;
- Recruitment and performance-related data, such as objectives, ratings, comments, feedback results, career history, work equipment, career and succession planning, skills and competencies and other work-related qualifications;
- Information related to your usage of Materion's assets and the administration of operational activities;
- Information needed for compliance and risk management, such as disciplinary records, background check reports and security data; and
- Payroll and payment or benefits-related information, such as salary and insurance information, dependents, government identifier or tax numbers, bank account details, and employment related benefits or information.

#### **Processing Purposes**

We process personal information for Materion's business purposes, including the following:

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- Workforce planning, recruitment and staffing;
- Workforce administration, payroll, compensation and benefit programs;
- Performance management; training; learning and development;
- Advancement and succession planning;
- Legal defense and compliance, including compliance with government authority requests for information, liens, garnishments and tax compliance;
- Compliance with legal, regulatory and ethical obligations;
- Workplace management, such as travel and expense programs and internal health and safety programs;
- The administration of operational activities, including production related activities;
- Supplier or vendor administration and management;
- Customer administration and management;
- Business development and marketing; advertising, sales, marketing and public relations;
- Planning and allocation of resources; production of products;
- Integrated supply-chain;
- Reporting financial information and provision of consultancy and advisory services;
- Research; development of products, technologies and services;
- Environmental, health and safety;
- The administration of information systems;
- Internal reporting;
- Financial, quality, environmental and other audits;
- Administering application process and on boarding for employment candidates;
- To protect Materion, its workforce, and the public against injury, theft, legal liability, fraud, abuse, or threat to the security of our networks, communications, systems, facilities and infrastructure; and other legal and customary business-related purposes.

#### **Legal Bases for Processing**

These uses of personal information are based on one of the following legal bases, as applicable:

- The need to process your personal information for the performance of our employment contract, or to take steps to enter into a contract with you;
- Materion's legal obligations as an employer;
- Materion's legitimate business interests including general human resource administration, general business operations, disclosures for auditing and reporting purposes, internal investigations, contractual obligations with third parties, management of network and information systems security, and the protection of Materion's assets; and
- In some specific and limited circumstances, we may need to use your personal data for other purposes. In such cases before we start to use your data, we will provide you with the relevant information on that purpose, and if needed request your consent.

#### **Sensitive Personal Information**

In addition, we may process sensitive personal information if it is needed for legitimate business objectives or if it is required to comply with applicable law. Sensitive personal information will not be collected, processed or transferred, except where adequate privacy protection mechanisms are in place and after having first obtained your informed consent, if required by law.

#### **Disclosures and Categories of Recipients**

We may disclose your personal information for legitimate purposes to:

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- Other Materion entities, joint ventures, subcontractors, vendors or suppliers who perform services on our behalf for the aforementioned purposes and are required to protect your personal data in accord with our requirements;
- A newly formed or acquiring organization if Materion is involved in a merger, sale or a transfer of some or all of its business;
- Any recipient, if we are legally required to do so, such as by court order or applicable law;
- Any recipient, with your consent, such as for employment verification or bank loans; or
- Any recipient when reasonably necessary such as in the event of a life-threatening emergency.

#### **International Transfers**

Your personal information may be transferred outside of the country where you work, including to countries that do not provide the same level of protection for your personal information. If you are a resident of the EEA, we may transfer your personal information to countries that have not been found by the European Commission to provide adequate protection. Where such transfers occur, we will ensure that adequate protection exists either through appropriate contractual arrangements or as required by law. Any transfers to Materion affiliated companies will be subject to binding intercompany agreements incorporating Model Contract Clauses as provided in the GDPR. A copy of the Model Contract Clauses can be obtained by contacting <a href="mailto:dataprivacy@materion.com">dataprivacy@materion.com</a>.

#### **Accuracy**

We take reasonable steps to ensure that personal information is accurate, complete, and current. Please note that you have shared responsibility with regard to the accuracy of your personal information. Please notify Human Resources of any changes to your personal information or that of your beneficiaries or dependents.

#### **Your Personal Information Rights**

You may contact us by e-mail dataprivacy@materion.com to exercise the following rights:

- Access your data to check and review it;
- Have a copy of your personal data;
- Request that we supplement, correct or delete your personal data; or cease or restrict the collection, processing, use or disclosure of your personal data; the right of correction will comprise the right to have incomplete personal data completed, including by means of providing a supplementary statement;
- Object to the processing of your personal data;
- Receive your personal data in a structured, commonly used and machine-readable format and have it transmitted to another controller provided that the processing is based on your respective consent or to execute a contractual relationship or a relationship prior to entering into contract with you.

You have the right to lodge a complaint with a supervisory authority in relation to the processing of your personal data.

#### **Information Security**

Materion takes precautions to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We have taken appropriate technical and organizational measures to protect the information systems on which your personal information is stored, and we contractually require our suppliers and service providers to protect your personal information.

#### Retention

Your personal information will be retained as long as necessary to achieve the purpose for which it was collected and



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conforming to the Materion Records Retention Policy, which is available on the Materion Matters in tranet website, or from your local company Human Resources Department. It will usually be retained for the duration of any contractual relationship, and for any period thereafter as legally required or permitted by applicable law. Our retention policies reflect applicable statute of limitation periods and legal requirements.

#### How to contact us and obtain further information

If you have any questions about this notice or if you believe that your personal information is not handled in accordance with the applicable law or this notice, or if you want to exercise your rights, you have several options:

- Discuss the issue with your supervisor or another supervisor or manager
- Contact the Materion Director of Global Compliance or any regional Compliance Manager. A current list of names and contact information for these individuals may be found under the Corporate Policy Contacts tab on the Materion Matters intranet site, or from your local company Human Resources Department.
- Contact any member of the Materion Law Department
- Contact your local Human Resources Department manager or any member of the Materion Corporate Human Resources
   Department.



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#### Attachment I

### **Materion Employers**

Location	Employer	Address
Materion AMG Germany	Materion Advanced Materials	Borsigstraße 10
	Germany GmbH	Alzenau 63755, Germany
Materion Stuttgart	Materion Brush GmbH	Motorstrasse 34
		Stuttgart, 70499, Germany
Netherlands Sales Office	Materion Advanced Materials	Boschcour 34
	Technologies and Services	6221 JR Maastricht
	Netherlands B.V.	The Netherlands
AMG UK Sales Office -	Materion Brush Ltd.	The Croft Hall, 1st Floor, The Croft
Hungerford		Hungerford, RG17 0HY, UK
Materion – Brush UK	Materion Brush Ltd.	1210 Parkview, Arlington Business Park
Office		Theale, Berkshire, RG7 4TY United Kingdom
Materion AMC	Aerospace Metal Composites	1 R A E Road
	Limited	Farnborough, Berkshire GU14 6XE
Materion Ireland	Materion Ireland Limited	Ballysimon Road
		Limerick, Ireland