



## **PRIVACY POLICY**

### **1.1 What is your personal data?**

Personal data is information that can identify you as an individual. Champlain Specialty Metals Inc. does not sell products through this website to businesses. When you submit an enquiry via our website, we ask you for your name, contact telephone number, ship to address, and email address.

We use this information to respond to your query, including providing you with any requested information about our products and services. We may also contact you after your enquiry in order to follow up on your interest and ensure that we have answered your questions to your satisfaction. We will do this based on our legitimate interest in providing accurate information prior to a sale.

### **1.2 How we process your personal data**

Champlain Specialty Metals Inc. complies with mandates to keep your personal data up to date; by storing and destroying it securely; by not collecting or retaining more data than is necessary; by protecting your personal data from loss, misuse, unauthorized access, and disclosure; and by ensuring that we take appropriate action to protect your personal data. We use your personal data to:

1. Deliver the products and services that individuals have requested.
2. Inform you of products or services we offer.
3. Sell, process, and deliver our product or service orders.
4. Comply with our legal obligations, including compliance with court orders or defend you and/or Champlain Specialty Metals Inc. in court if necessary.
5. Carry out a task in the public interest, such as a request for national security purposes.

Champlain Specialty Metals Inc. may transfer your personal data to the United States Government authorities if requested by them.

### **1.3 Legal basis for processing personal data under general data protection regulation (GDPR)**

If you reside in the European Economic Area (EEA), Champlain Specialty Metals Inc.'s legal basis for collecting and using the personal data described in this Privacy Policy depends on the personal data we collect and the specific context in which we collect it.

Champlain Specialty Metals Inc. may process your personal data because:

1. We need to perform a contract with you.
2. You have given us permission to do so.
3. The processing is in our legitimate interests due to your status as a customer of Champlain Specialty Metals Inc. or of contacting you to market Champlain Specialty Metals Inc.'s products and it's not overridden by your rights.
4. To comply with the law.

#### **1.4 Sharing your personal data**

Your personal data will be treated as strictly confidential and we will only share it with Champlain Specialty Metals Inc. employees. We will share your personal data with other third parties outside of Champlain Specialty Metals Inc. only if you give us permission.

#### **1.5 How long we keep your personal data**

We only keep your personal data for as long as it is needed from a business perspective or where accounting, employment, and legal commitments dictate.

#### **1.6 Data protection rights under general data protection regulation (GDPR)**

If you are a resident of the European Economic Area (EEA), you have the following data protection rights:

1. **The right to access, update or to delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your personal data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
2. **The right of rectification.** You have the right to have your personal data rectified if that personal data is inaccurate or incomplete.
3. **The right to object.** You have the right to object to our processing of your personal data, including the right to object to any processing related to direct marketing.
4. **The right of restriction.** You have the right to request that we restrict the processing of your personal data.
5. **The right to data portability.** You have the right to be provided with a copy of the personal data we have on you in a structured, machine-readable and commonly used format.
6. **The right to withdraw consent.** You also have the right to withdraw your consent at any time where Champlain Specialty Metals Inc. relied on your consent to process your personal data.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

### **1.7 Further use of your data**

If we want to use your personal data for any other reason or in any other capacity, Champlain Specialty Metals Inc. will first contact you with an updated notice.

### **1.8 Contact Details**

To exercise your rights under this notice, or for any questions, please contact Champlain Specialty Metals Inc. at [sales@champmetals.com](mailto:sales@champmetals.com) or 1-800-253-2434.