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Subject	LEGAL		
Subtitle	California Applicant Privacy Notice		
Issue Date	1/1/2023	Effective Date	1/1/2023
Applies to Employee Type	All Job Applicants 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 how Ryerson collects and processes personal information about California Residents during the application and recruitment process. 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.

Ryerson may collect personal information directly from you, as a job applicant, or may receive personal information from third parties, for example, in connection with a background, employment, or reference check, subject to your consent where required by law.

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 at Recruitment	Collected After Conditional Offer of Employment
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	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	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).	NO	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	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	NO
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO	NO
G. Geolocation data	Physical location or movements.	NO	NO
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	YES	NO
I. Professional or employment-related information	Current or past job history or performance evaluations.	YES	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.	NO	YES
K. Inferences drawn from other personal information	Profile reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence.	NO	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.

We only process your personal information where applicable law permits or requires it in connection with carrying out our application and recruitment process. We may process your personal information for the following legitimate business purposes:

- Identifying and evaluating job applicants, including assessing skills, qualifications, and interests.
- Verifying your information and carrying out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law.
- Communicating with you about the recruitment process and your application.
- Keeping records related to our hiring processes.
- Creating and submitting reports as required by applicable laws or regulations.
- To comply with our legal, regulatory, or other corporate governance requirements.
- Analyzing and improving our application and recruitment process.
- Complying with applicable laws, regulations, legal processes, or enforceable government requests.
- To protect the rights and property of Ryerson, other job applicants, employees, or the public, as required or permitted by law.
- For any purpose related to any of the foregoing.

In addition to using your personal information for the position for which you have applied, we may retain and use your personal information to inform you about and consider you for other positions that may be appropriate for you. If you do not want to be considered for other positions or would like us to remove your personal information, you may contact our data protection officer in writing or by e-mail.

We will only process your personal information for the purposes for which we collected it. If we need to process your personal information for an unrelated purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal information without your knowledge or consent where required by applicable law or regulation.

We may also process your personal information for our own legitimate interests, including for the following purposes:

- To prevent fraud.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
- To support internal administration with our affiliated entities.

Where we have a legitimate need to process your personal information for purposes not identified above, we will only do so only after providing you with notice and, if required by law, obtaining your prior, express consent.

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 share personal data received with third parties only when required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering our payroll, benefits or plans or accomplishing the purposes set forth in Section III above. This may require that we share your information with vendors like ADP, or others such as accountants, actuaries, insurers or a third-party administrator or consultant used by an insurer, or vendors we retain to assist us when necessary to accomplish any of the purposes noted in Section III.

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.

We may also disclose your personal information for the following additional purposes where permitted or required by applicable law:

- To a recruiting firm to assist in our recruiting efforts.
- To other members of the Ryerson Family of Companies (including outside of California) for the purposes set out in this Privacy Notice and as necessary to administer the application and recruitment process.
- As part of our regular reporting activities to other members of our family of companies.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal information to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal information necessary for the specific purpose and circumstances.
- To protect the rights and property of Ryerson.
- During emergency situations or where necessary to protect the safety of persons.
- Where the personal information is publicly available.
- For additional purposes with your consent where such consent is required by law.

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. NOTIFICATION

We only ask you to provide personal information that we need to enable us to make a decision about whether or not to offer you a role. If you do not provide particular information to us, then we will have to make a decision on whether or not to offer you a role without that information, which in some cases could result in us deciding not to recruit you. If you do not provide us with names of a reference when asked, we will not usually be able to offer you the role. In addition, some of the personal information you provide to us is required by law. For example, if you do not provide us with the documentation we need to check your right to work, then we cannot by law employ you.

If you choose not to provide us with personal information requested, we will tell you about the implications of any such decision at the relevant time.

VIII. RIGHT TO REQUEST DELETION OF INFORMATION

Job applicants 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.

IX. 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 access our full Privacy Policy and CCPA Disclosure of Consumer Rights at <https://www.ryerson.com/ccpa>.