



## Job Applicant Privacy Notice for California Residents

Effective Date: January 1, 2020

### I. Introduction

In accordance with the California Consumer Privacy Act (CCPA), this Privacy Notice (the "Notice") describes the policies and practices of Schnitzer Steel Industries, Inc., including its wholly owned subsidiaries, Pick-n-Pull and Cascade Steel ("**Schnitzer**" or "**we**" or "**us**") with respect to the collection, use and sharing of the personally identifiable information ("PII") we collect regarding you and other applicants for employment at Schnitzer. If you use our website or otherwise provide us with personal information about you in a non-employment-related context, your PII will be treated in accordance with the Privacy Policy posted on our website, [dataprivacy.schn.com](http://dataprivacy.schn.com), otherwise, personal information we collect about you will be governed by this Notice.

For purposes of this Notice, PII about you means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household.

### II. How Does Schnitzer Collect Your PII and What Types of PII Does It Collect?

Schnitzer collects PII about you when you actively provide it to us, such as when you inquire by email or letter about available jobs, submit a job application to us, etc.

We also may collect PII about you from the following sources: the Internet, including social media websites and other websites; the press or other print media; credit reporting agencies; and other persons and organizations as permitted under applicable law or as authorized by you.

Not all information that we collect from you is PII. We may collect information about you that we cannot use to identify you specifically. Listed below are the types of information about you that we may have collected within the past 12 months. These types of information are PII only if the information identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your device.

- **Identifiers** such as: your name, postal address, online identifier, Internet Protocol address, email address, Social Security number, driver's license number, or other similar identifiers.
- **"Customer Records" information** (some of which may be identifiers or professional/employment-related information as well), such as your 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.

- **Internet or other similar network activity**, such as browsing history, search history, information on your interaction with our website.
- **Geolocation data**, meaning the physical location or movements of the device you use to connect with us online.
- **Sensory data**, such as audio, electronic, visual, or similar information.
- **Biometric information**, such as fingerprints or voiceprints.
- **Professional or employment-related information**, such as your current or past job history.
- **Personal characteristics** that are related to classifications legally protected from discrimination, such as race, national origin, ethnicity, marital status, age and gender.
- **Inferences drawn from other PII**, such as a summary we might make based on your apparent personal preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

### **III. Our Business Purposes for Collecting Your PII; How We Use the Information**

We may use the PII we collect from you for a variety of purposes permitted by law, including:

- To process your application for employment;
- To communicate with you, including in response to your inquiries and to fulfill your requests, and to inform you of changes to terms and conditions involving your potential employment, benefits, etc.;
- To protect Schnitzer's security, such as by confirming your identity for network access or physical security purposes;
- For legal, compliance and risk management purposes, including to monitor our compliance with fair employment laws and regulations; and
- Other legally permissible or everyday business purposes, including data analysis, compliance with law enforcement, and other legal processes.

### **IV. When and With Whom We Share Your PII**

We may share your PII with our service providers that assist us with recruitment and other employment-related services. We bind our service providers to protect the confidentiality and security of the PII we share with them.

We also share PII with others as we believe to be necessary or appropriate, consistent with applicable law, including for the following purposes: (a) to comply with applicable legal requirements (for example, responding to subpoenas); (b) to respond to requests from public and government authorities; (c) to protect our rights or property or the privacy, safety or property of you or others; (d) to allow us to pursue available remedies or limit the damages that we may sustain; and (e) to evaluate or conduct a merger, divestiture, restructuring, reorganization, assignment, transfer, or other disposition of all or any portion of our business or assets.

## **V. Questions You May Have**

If you have any questions regarding this Policy, please contact your Human Resources Representative, or email us at [dataprivacy@schn.com](mailto:dataprivacy@schn.com).