



**DONCASTERS**

## **Privacy Notice for California Residents**

**Effective Date:** January 2020

**Last Reviewed on:** December 2019

This Privacy Notice for California Residents supplements the information contained in the current Doncasters Group Privacy Policy and applies solely to all employees, businesses, visitors, users, and others who reside in the State of California (“Consumers” or “You”).

The Doncasters Group has issued this Privacy Notice to comply with the current California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA shall have the same meaning when used in this Privacy Notice.

### **Information We Collect**

The Doncasters Group via its wholly owned US subsidiaries, Doncasters, Inc., Southern Tool LLC, Certified Alloy Products Inc., Avistud LLC and Trucast LLC, collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular identifiable Consumer(s) (“Personal Information”).

Our website(s) have collected the following categories of Personal Information from Consumers within the last twelve (12) months:

#### **Category A: Identifiers**

Examples: A real name, Internet Protocol address, email address, or other similar identifiers.

Collected: YES

**Category B:** Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: 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.

Collected: YES

#### **Doncasters Inc.**

835 Poquonnock Road, Groton, Connecticut, 06340, USA. Tel: +1 860 449 1603

#### **A Doncasters Limited Company**

Registered Office: Repton House, Brethby Business Park, Ashby Road, Burton-Upon-Trent, Staffordshire, DE15 0YZ, UK



**Category C:** Protected classification characteristics under California or federal law.

Examples: We are required to request this information under the federal Equal Employment Opportunity (Affirmative Action Plan) (“EEOC (AAP)”) regulations, such as 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). Please note Consumers do not have to provide this Category C Personal Information, which is optional.

Collected: YES

**Category D: Commercial Information**

Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming history or tendencies

Collected: NO

**Category E: Biometric Information**

Examples: Hair color, eye color, fingerprints, height, retina scans, facial recognition, voice, and other biometric information

Collected: NO

**Category F: Internet or other electronic network activity information**

Examples: Browsing history, search history, and information regarding a Consumer’s interaction with an Internet website, application or advertisement. Please note we only record browsing history in an anonymized form. No Category A Personal Information is stored about Consumers who have browsed our websites.

Collected: YES

**Category G: Geolocation data**

Collected: NO

**Category H: Audio, electronic, visual, thermal, olfactory, or similar information**

Collected: NO



### **Category I: Professional or employment related information**

Examples: Work history, references, and other information provided on application

Collected: YES

**Category J: Education information** (Information that is not “publicly available personally identifiable information” as defined in the California Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99))

Collected: YES

**Category K:** Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

Collected: NO

### **Consumer Personal Information does not include:**

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope, such as but not limited to:
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

**We obtain the categories of Personal Information listed in Category A-K above from the following categories of sources:**

- **Directly from You.** For example, from application form you complete on our website.
- **Indirectly from You.** For example, recording from which website you were directed to apply to work for us.



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## **Use of Personal Information**

We may use, or disclose the Personal Information we collect for one or more of the following legitimate business purposes:

- **To process your application for employment.** For example, reviewing your employment related information to understand if you may be qualified for the job in which you are applying
- **To include for Equal Employment Opportunities Commission (EEOC) purposes.** For example, providing your demographics as required on an annual basis for use including enforcement, self-assessment by employers, and research.
- **To understand how you were directed to apply for a job with us.** Whether it be a job board or referral from another employee.

## **Sharing Personal Information**

We may disclose and/or transfer your Personal Information to a third party for legitimate business purposes. When we disclose Personal Information for a business purpose, we enter into a formal contract that describes the purpose and requires the recipient to both keep that Personal Information confidential with appropriate security and safeguards and not use, process, transfer or sell the Personal Information under any circumstances except in order to perform its contractual obligations under the contract.

## **We share your Personal Information with the following categories of third parties:**

- ADP Inc., our recruitment management tool. Please see <https://www.adp.com/privacy> for their privacy policy.

## **Disclosures of Personal Information for a Business Purpose**

- In the preceding twelve (12) months, we have disclosed Personal Information for business purpose to ADP Inc.

## **Sales of Personal Information**

- In the preceding twelve (12) months, we have not under any circumstances sold any Personal Information to any third parties nor have any of our trusted third-party service providers (to the best of our knowledge) sold any Personal Information we have shared/disclosed with them.



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## **Your Rights and Choices**

The CCPA provides Consumers with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

### **Access to Specific Information and Data Portability Rights**

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months. Once we receive and confirm your Verifiable Consumer Request, we will disclose to you:

- The categories of Personal Information we collected about You.
- The categories of sources for the Personal Information we collected about You.
- Our business purpose for collecting the Personal Information.
- The categories of third parties with whom we share the Personal Information.
- The specific pieces of Personal Information we collected about You (also called a “Data Portability Request”).
- If we sold or disclosed Your Personal Information for a business purpose, two separate lists disclosing:
  - sales, identifying the Personal Information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

### **Deletion Request Rights**

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our third-party service providers to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our third-party service provider(s) to:

- Complete the transaction for which we collected the Personal Information; providing goods or services that you requested; take actions reasonably anticipated within the context of our ongoing business relationship with you; or otherwise performing our contractual obligation with you.



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- Detecting security incidents; protecting against malicious, deceptive, fraudulent or illegal activities, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercising free speech; ensuring the right of another Consumer to exercise their free speech rights or exercising another's right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engaging in public or peer-reviewed scientific, historical or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with Consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which You provided it.

### **Exercising Access, Data Portability and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a Verifiable Consumer Request either via:

Email to: [GDPRInquiry@doncasters.com](mailto:GDPRInquiry@doncasters.com); or

Website: [www.Doncasters.com/contact](http://www.Doncasters.com/contact)

Only You, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a Verifiable Consumer Request for access or data portability twice within a 12-month period. The Verifiable Consumer Request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.



We cannot respond to Your request or provide You with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to You. We will only use Personal Information provided in a Verifiable Consumer Request to verify the requestor's identity or authority to make the request.

### **Response Timing and Format**

We endeavor to respond to a Verifiable Consumer Request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the Verifiable Consumer Request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

We do not charge a fee to process or respond to your Verifiable Consumer Request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Personal Information Sales Opt-Out and Opt-In Rights**

If you are 16 years of age or older, you have the right to direct us to not sell your Personal Information at any time (the "right to opt-out"). We do not sell the Personal Information of Consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the Consumer who is between 13 and 16 years of age, or the parent or guardian of a Consumer less than 13 years of age. Consumers who opt-in to Personal Information sales may opt-out of future sales at any time. To exercise the right to opt-out, You (or Your authorized representative) may submit a request to us by either:

Email to: [GDPRInquiry@doncasters.com](mailto:GDPRInquiry@doncasters.com); or

Website: [www.Doncasters.com/contact](http://www.Doncasters.com/contact)

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize Personal Information sales. However, you may change your mind and opt back in to Personal Information sales at any time. We will only use Personal Information provided in an opt-out request to review and comply with the request.

### **Non-Discrimination**

We will not discriminate against You for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:



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- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send us an electronic message through our website or write us at our address listed on our webpage.

### **Changes to Our Privacy Notice**

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will post the updated notice on the website and update the notice's effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

### **Contact Information**

If You have any questions or comments about this notice, the ways in which we collect and uses your Personal Information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us via:

Email to: [GDPRInquiry@doncasters.com](mailto:GDPRInquiry@doncasters.com); or

Website: [www.Doncasters.com/contact](http://www.Doncasters.com/contact)