# Kemper AIP Metals LLC.

**Privacy Policy**

## A. Overview

This Privacy Policy (the "**Policy**") governs the collection and handling of information by which an individual user in the United States may be personally identified (collectively, "**personal information**") through this website and any related mobile applications (collectively, the "**Site**"), operated by **Kemper AIP Metals, LLC** ( "**Kemper**", "**we**", "**us**" or "**our**"). If you are a resident outside of the United States, please see the applicable privacy policy on the website of our parent company, Gebr. Kemper GmbH + Co. KG.

This Policy describes:

- The types of personal information we may collect or that you may provide when you register with, access, or use the Site.
- Our practices for collecting, using, maintaining, processing, protecting, and disclosing that personal information.

This Policy applies only to personal information we collect on or through the Site. This Policy does not apply to personal information that we collect offline, or that you provide to or is collected by any third party, which may have their own privacy policies that we encourage you to read before providing your personal information on or through them (see "Third-Party Information Collection" below).

Please read this Policy carefully to understand our policies and practices regarding your personal information and how we will treat it. In using the Site, you agree to be bound by this Policy. If you do not accept the terms of this Policy you may not access or use the Site and you should discontinue your use of it.

This Policy may change from time to time (see "Changes to Our Privacy Policy" below). Your continued use of the Site after we revise this Policy means you accept those changes, so please check this Policy periodically for updates.

## B. How We Collect Information

We collect personal information from and about users of the Site:

- Directly from you when you provide it to us.
- Automatically when you use the Site.
- Through authorized tracking technologies.
- From third parties.

**Information You Provide Directly to Us**

When you download, register with, access, or use any aspect of the Site, we may ask you to provide the following types of information:

- Personal contact information, including but not limited to, name, postal address, email address, and telephone number.
- Payment personal information, including but not limited to, credit card personal information.

This personal information may be provided by you in the following ways:

- **Filling in forms on the Site.** This includes personal information that you may provide when registering with, accessing, or using any aspect of the Site, when requesting further products or services or information about them, and when reporting problems with the Site.
- **Contacting us.** This includes personal information you may provide when you correspond with us, including, but not limited to, email addresses and phone numbers.
- **Participating in surveys and promotions.** This includes personal information you may provide when you respond to surveys, sweepstakes or other promotional matters that we might ask you to complete for research and/or promotional purposes.
- **Carrying out transactions.** Details of transactions you carry out through the Site and of the fulfillment of your orders. Among other things, you may be required to provide financial personal information before placing an order through the Site.
- **Searching within the Site.** This includes personal information you may provide when you perform search queries on the Site (when such search functionality is enabled).

**Automatic Information Collection and Tracking**

When you download, register with, access, or use various areas of the Site, the Site may use technology to automatically collect:

- **Usage Details.** When you access and use the Site, we may automatically collect certain details of your access to and use of the Site, including traffic data, location data, logs, and other communications data and the resources that you access and use on or through the Site.
- **Device Information.** We may collect personal information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network personal information, and the device's telephone number.
- **Stored Information and Files.** The Site may also access metadata and other personal information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book personal information.

For information about your choices with respect to such matters, see "Your Choices About Our Collection, Use, and Disclosure of Your Information" below and our Cookie Policy.

**Cookie Policy and Authorized Tracking Technologies**

The technologies we use for automatic personal information collection may include:

- **Cookies.** A cookie is a small file placed on your device. It may be possible to refuse to accept cookies by activating the appropriate setting on your device. However, if you select this setting you may be unable to access certain parts of our Site.
- **Web Beacons.** The Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Kemper, for example, to count users who have visited those pages or opened an email and for other related Site statistics (for example, recording the popularity of certain Site content and verifying system and server integrity).

We do not deploy non-essential cookies or analytical tracking technologies in the operation of our Site unless you have provided us your affirmative consent to the use of non-essential cookies or analytical tracking technologies under our cookies consent process.

For more personal information about such matters, please see our Cookie Policy:

https://kemperaipmetals.com/content/documents/footer/kaip-metals-cookie-policy.pdf

**Third-Party Information Collection**

*Payments Processing*. To the extent payments functionality is enabled on the Site, we use third-party services for payments processing (e.g., payment processors). Kemper itself will not store or collect your payment card details. That personal information is provided directly by you to our third-party payment processors whose use of your personal information for such purposes is governed by their privacy policy. Payment processors are required by an industry self-governing body to adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment personal information.

*Certain Third-Party Website and Application Integrations.* Our Site may from time to time include plug-in tools and applications and integrations with third party websites that help us fulfill certain business purposes of ours. When this is the case, we regard such tool, applications and website operators as service providers to us that help us fulfill such business purposes and in such capacity, we may share personal information of yours with such service providers.

*Other Sites*. Our Site may contain links to other sites and applications/apps that are not operated by us. If you click a third-party link, you will be directed to that third party's site or app. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites, apps or products or services that are linked from our Site, and we strongly advise you to review the applicable privacy policy of every site or app you visit.

## C. How and Why We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the Site and its contents, and any other information or products or services that you request from us.
- Fulfill orders, provide service personal information and to fulfill any other purpose for which you provide it.
- Remember you and view activity on our Site. If you have allowed access to cookies (please see our Cookie Policy) our Site will automatically recognize you the next time you visit and may pre-populate fields to make ordering easier and to improve your experience by directing you to personal information on our Site that we think will be of interest to you. We also gather details of your visits to our Site, including details of pages viewed, accessed or visited, your use of features on the Site, and the length of your visit.
- Process returns and address complaints and inquiries.
- Communicate offers, events and special promotions. We will use contact details you have given us, along with any personal information you have given us about your gender or age, and personal information about your previous orders to send you personal information about our offers and events that we think will be of interest to you.
- Update our records. We will periodically check that the personal information we store for the purpose of communicating with you is accurate. If you would like to update the personal information that we hold about you, please update your account personal information and preferences on our Site.
- Legal purposes. We sometimes need to use personal information that we have gathered from you or third parties (such as law enforcement or credit reference agencies), or that you have provided to us, to comply with our legal obligations or for other legal reasons - for example to trace fraudulent transactions. We may also use your personal information where it is reasonable for us to do so and where there is no disadvantage to you.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections matters.
- Notify you when updates for the Site are available, and of changes to any products or services we offer or information about them provided through the Site.

In addition, the usage information we collect helps us to improve the Site and to deliver a better and more personalized experience by enabling us to:

- Estimate the number of Site visitors and usage patterns.

- Store personal information about your preferences, allowing us to customize the Site according to your individual interests.
- Speed up your searches.
- Recognize you when you use the Site.
- Understand and report browsing information. We will collect information, if available, about your operating system and browser type and for system administration, which is generally considered to be technical data about our users' browsing actions and patterns and does not identify any individual.
- Optimize and test our system, including to curate, implement and test new systems or processes to provide a better user-experience and expand our online offerings.

We may also use your personal information to contact you about products or services that may be of interest to you, including our own or those of third parties. For more information about such matters, see "Your Choices About Our Collection, Use, and Disclosure of Your Information" below.

**D. Disclosure of Your Information**

We may disclose aggregated information about Site users, and information that does not identify any individual without restriction.

In addition, we may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliates, for various business purposes, including to assist us with processing personal information.
- To contractors, service providers, and other third parties we use to support our business. This includes to service providers to make products or services available to you and to promote our products or services to you, such as our suppliers of IT and marketing products or services and courier companies for the fulfillment of products or services to you.
- To third-party payment providers, when you choose to use their payment products or services.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Kemper's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Kemper about the Site's users is among the assets transferred.
- To comply with any court order, law, or legal process, including to respond to any subpoena, government or regulatory request.
- To third parties to assist us to enforce our rights arising from any contracts entered into between you and us and for billing and collection. These third parties may include credit reference, fraud prevention, and law enforcement agencies where it is necessary for us to do so to enforce a legal

obligation or otherwise where it is reasonable for us to do so for fraud protection and credit risk reduction.

- We may share your information with third parties when we forward Digital Millennium Copyright Act ("**DMCA**") notifications we receive in accordance with the Kemper Terms of Use. DMCA notifications will be forwarded as submitted and we will not remove any personal information that may be included in the applicable notification
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Kemper, our customers, other Site users, our employees, agents and affiliates or others.
- For any other purpose disclosed by us when you provide the personal information.
- With your consent.

## E. Your Choices About Our Collection, Use, and Disclosure of Your Information

This section describes mechanisms that we provide for you to control certain uses and disclosures of your personal information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. However, if you disable or refuse cookies or block the use of other tracking technologies, some parts of the Site may then be inaccessible or not function properly. Our Cookie Policy has additional information about our use of cookies and how you can control certain uses of them, and can be accessed here:

  https://kemperaipmetals.com/content/documents/footer/kaip-metals-cookie-policy.pdf

- **Promotions.** You can opt-out of receiving promotional materials by selecting "unsubscribe" in emails we send to you.

Residents of California and of other U.S. states may have additional personal information rights and choices. Please see "Your U.S. Privacy Rights" and "Your California Privacy Rights" below for more information.

## F. Accessing and Correcting Your Personal Information

You may also send us an email (see email address in Section M, "Contact Information", below) to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change or delete personal information if we believe the change would violate any law or legal requirement or cause the personal information to be incorrect.

Residents of California and of other U.S. states may have additional personal information rights and choices. Please see "Your U.S. Privacy Rights" and "Your California Privacy Rights" below for more information.

## G. Children's Privacy and Age Limitations for the Site

The Site is intended for use by persons aged 18 or older, and by your use of this Site you affirm that you are at least 18 years of age. We do not knowingly collect personal information from children under the age of 18. If we discover or are made aware that we have received personal information from an individual who indicates that he or she is, or whom we otherwise have reason to believe is, under the age of 18, we will delete such personal information from our systems. If you are a parent or legal guardian of a child under the age of 18 and believe that your child has disclosed personal information to us, we welcome you contacting us as provided below so that we can address such matter.

From time to time there may be instances when we collect personal information through the Site about children under the age of 18, but we will only knowingly do this when such personal information is provided to us by that child's parent or legal guardian. In all cases where we've collected personal information about a child under the age of 18, the parent or legal guardian may contact us as provided below to review and request deletion of such child's personal information as well as to prohibit the further use of such personal information by us.

## H. Changes to Our Privacy Policy

We may update this Policy from time to time. The most recent Privacy Policy will be posted on this page. If we make material changes to our manner of use or disclosure practices for personal information covered by this Policy, we will also provide additional notice where required by law (and which may include prompting you to affirmatively acknowledge that the Policy has changed and, if legally required, obtain your consent), before using your personal information for purposes that are materially different than those previously addressed in this Policy.

The date that this Policy was last revised is identified at the top of the page.

## I. Your U.S. State Privacy Rights.

U.S. state consumer privacy laws provide residents of certain states with additional rights regarding our use of their personal information.

- California residents have the additional rights set forth in more detail in Section J "Your California Privacy Rights" below, of this Policy.

- Residents of Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Maryland, Minnesota, Montana, Nebraska, Nevada, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia residents have rights to:

    - Confirm whether we process their personal information.
    - Access and delete certain personal information.
    - Correct inaccuracies in their personal information, taking into account the personal information's nature and the processing purpose (excluding Iowa and Utah).
    - Data portability.
    - Opt-out of personal data processing for:
        - targeted advertising (excluding Iowa);

        - sales; or
        - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
    - Either limit (opt-out of) or require consent to process sensitive personal data.

The meaning of "sensitive personal information" differs in each of the above states. Generally, however, sensitive personal information means personal information that reveals a user's racial or ethnic background; national origin; religious beliefs; mental or physical condition or diagnosis; sexual orientation; status as transgender or nonbinary; status as a victim of crime; citizenship or immigration status; precise geolocation data; or genetic or biometric data. We do not collect any of the foregoing types of sensitive personal information without your consent.

In addition, residents of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia have the right to appeal any decision that we make with regard to the exercise of any of their above-noted rights.

To exercise any of the above-noted rights or to appeal any decision that we make regarding the exercise of such rights, please contact the Company as noted in Section M "Contact Information" of this Policy.

## J. Your California Privacy Rights

The following additional privacy notices for California residents (the "**California Notice**") supplement the information and disclosures contained in the other portions of this Policy and apply solely to individuals who reside in the State of California ("**California consumer**" or "**you**"). Kemper adopts this California Notice to comply with the California Consumer Privacy Act, as amended by the California Privacy Rights Act, and their related regulations (collectively the "**CCPA**") and other applicable California laws.

**Overview of Consumer Rights Under the CCPA**

Under the CCPA, California consumers have certain rights regarding their personal information, including:

- The right to know the categories of personal information that Kemper has collected and the categories of sources from which we obtained such personal information.
- The right to know Kemper's business purposes for sharing personal information.
- The right to know the categories of third parties with whom Kemper shared personal information.
    - The right to know if we sold or disclosed your personal information for a business purpose, comprising two separate lists disclosing:
        - any sales, which list identifies the personal information categories that each category of recipient purchased (note that at present we do not sell personal information that we collect); and

        - any disclosures for a business purpose, which list identifies the personal information categories that each category of recipient obtained.

- The right to access the specific pieces of personal information that Kemper has collected
- The right to correct personal information that Kemper has collected.
- The right to delete your personal information.
- The right to not be discriminated against if you exercise your rights under the CCPA.

The provisions below of this California Notice provide further details about these and other rights and certain details about the exercise of such rights.

**Information We Collect**

We collect personal information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer, household or device. Under the CCPA, personal information does not include:

- Publicly available personal information from government records.
- De-identified or aggregated California consumer personal information.
- Information excluded from the CCPA's scope, including:
    - Health or medical personal 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; and
    - Personal information covered by certain other laws, including 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.

We have collected the following categories (the "**Covered Categories**") of personal information from consumers within the last twelve (12) months:

| **Category** | **Examples** |
|---|---|
| Identifiers | An individual's 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 |

| | |
|---|---|
| Customer records / personal information categories described in Cal. Civ. Code § 1798.80(e) | A name, signature, 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 personal information, medical personal information, or health insurance personal information (Note: Certain of the above personal information may be considered to be sensitive personal information under the CCPA and, to the extent such data is considered to be sensitive personal information you have the right to limit the use and disclosure of such data.) |
| Protected Classification Characteristics | Age, race, color, ancestry, national origin, religion, creed, marital status, medical condition, disability, sex, sexual orientation, veteran status |
| Commercial personal information | Records of personal property, products or services obtained, obtained, or considered, or other purchasing or consuming histories or tendencies |
| Internet or other similar network activity | Browsing history, search history, personal information on a California consumer's interaction with our website, application, or advertisement and any social media sites from which user personal information is linked, connected or obtained |
| Geolocation data | Date related to a user or device’s physical location or movements (Note: Certain precise geolocation data may be considered to be sensitive personal information under the CCPA and, to the extent such data is considered to be sensitive personal information you have the right to limit the use and disclosure of such data.) |
| Inferences drawn from other personal information | These include data concerning a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes, among other matters |

| | |
|---|---|
| Sensitive personal information | Personal information that reveals a consumer's Social Security, driver's license, state identification card, or passport number; a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; a consumer's precise geolocation; a consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a consumer's mail, email, and text messages unless we are the intended recipient of the communication; a consumer's genetic data |

**Sources of Personal Information**

In addition to sources of personal information addressed elsewhere in this Policy, we obtain the categories of personal information listed above from the following categories of sources:

- **Directly From You.** For example, from forms you complete or products or services you obtain or from communications with you, such as when you contact Kemper (whether in person, by mail, by phone, online, by electronic communication or by other means) including our customer support service.
- **Indirectly From You.** For example, from observing your actions on our Site or from products or services that you have obtained from Kemper.
- **From Others**.
    - From third party service providers. For example, if you choose to make an electronic payment directly to Kemper, or through a linked website or mobile application, or through an affiliate of ours, Kemper may receive personal information about you from third parties such as payment products or services providers, for the purposes of that payment.
    - From affiliates. We may collect personal information about you from our affiliates or others acting on their behalf.
- **From Public Sources.** For example, we may collect personal information from public records.

**Uses of Personal Information**

In addition to uses of personal information addressed elsewhere in this Policy, we may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill the reason that you provided the personal information. For example, if you share your name and contact personal information to request a price quote, request to be contacted by an affiliate, or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to obtain a service, we may

use that personal information to process your payment and facilitate delivery. We may also save your personal information to facilitate new service orders.

- To perform products or services such as customer service, order fulfillment, payment processing, financing and advertising, marketing or analytic products or services.
- To advance our commercial or economic interests, such as by helping you to effect, directly or indirectly, a commercial transaction.
- To verify or maintain quality or safety standards or improve or upgrade a service provided or controlled by or for us.
- To provide, support, personalize and develop our Site, products or services or other activities such as products or services monitoring.
- To create, maintain, customize and secure your account with us.
- To process your requests, transactions and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Site experience and to deliver content and products or services relevant to your interests, including targeted offers and ads through our Site, third-party sites and by mail, email or text message (with your consent, where required by law).
- To help maintain the safety, security and integrity of our Site, products or services, databases and other assets and business.
- For testing, research and analysis purposes, including to develop and improve our Site, products or services.
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA or applicable law.
- To send you personal information relevant to your past products or services and interests, subject to compliance with applicable laws regarding direct marketing.
- To otherwise use as reasonably necessary and proportionate to achieve our operational or notified purpose for collecting personal information and as compatible with the context in which we collected the personal information.
- To perform products or services on behalf of a CCPA-covered business or its service provider, such as customer service, order fulfillment, payment processing, financing and advertising, marketing, or analytic products or services.

- To review and audit our business interactions with you.
- To detect or prevent security incidents or other illegal activity.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Site users, including California consumers, is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated or incompatible purposes without providing you notice.

**Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, Kemper has disclosed personal information in each of the above-noted Covered Categories for a business purpose.

The categories of third parties to which we may disclose personal information collected by us include the following:

- Service providers
- Parent Company and Affiliates
- Recipients of data from cookies (subject to our Cookie Policy)

**Sales of Personal Information**

Kemper does not sell personal information to third parties.

**Exercising Your CCPA Rights and Choices**

The sections below describe how you may exercise your rights under the CCPA.

*Access to Specific Information and Data Portability Rights.* You have the right to request that we disclose certain personal information to you about our collection and use of your personal information. Once we receive and confirm your verifiable consumer request (see “Exercising Access, Data Portability and Deletion Rights” below), 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 or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.

- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list disclosing the personal information categories that each category of recipient obtained.

As allowed by the CCPA, we do not provide these access and data portability rights for business-to-business personal information.

**Deletion and Correction 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 (see "Exercising Access, Data Portability, Deletion and Correction Rights" below), we will delete (and direct our service providers to delete) your personal information from our (and service provider) records, unless an exception applies.

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

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug the Site to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another California consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Engage 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 personal information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Comply with a legal obligation.
- Make other internal and lawful uses of that personal information that are compatible with the context in which you provided it.

As allowed by the CCPA, we do not provide these deletion rights for business-to-business personal information.

In addition, if you provide us with a verifiable consumer request to correct inaccurate personal information that we maintain about you, we will use commercially reasonable efforts to correct such personal information in accordance with your instructions.

**Exercising Access, Data Portability, Deletion and Correction Rights.**

To exercise the access, data portability, deletion and correction rights described above, you should submit a verifiable consumer request to us by one of the contact methods specified in Section M, “Contact Information”, below.

Only you, or someone legally authorized 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 a minor child for whom you are a parent or legal guardian.

You may only make a verifiable consumer request for access or data portability twice within a twelve (12) month period. The verifiable consumer request must provide sufficient personal information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative, which may include:

- Your name
- Your address
- Additional personal information depending upon the type of request and the sensitivity of the personal information involved with such request
- Sufficient detail to enable us to properly understand, evaluate and respond to such request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or your authority to make the request and confirm that the personal information involved with the request relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, if online accounts are enabled on the Site, we will consider requests made through a password-protected online account that you maintain with us to be sufficiently verified when the request relates to personal information associated with that online account, provided such online account functionality is then made available by us on the Site.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity and 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, we will inform you in writing of the reason and any extension period.

If online account functionality is then made available by us on the Site and if you have an online account with us, we may deliver our written response to that online account. If you do not have an online account

with us, or online accounts are not enabled, we will deliver our written response by mail or electronically, at your option.

If we're unable to comply with your request, the response we provide will also explain the reasons we cannot comply with the request. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the personal information from one entity to another entity without hindrance.

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.

**Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA or other applicable law, we will not, as a result of you exercising any of your rights under the CCPA:

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

**Retention of Personal Information**

Our policy is to retain personal information only for as long as is necessary to fulfill the reason for which the personal information was collected and as necessary to process such personal information. In addition to the above, we will retain your personal information for the purposes of satisfying any professional, legal, accounting or reporting requirements to which we are subject. To determine the appropriate retention period for personal information, we consider the scope, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which we collected and processed your personal information and whether we can reasonably achieve those purposes through other means, as well as any applicable legal and professional requirements.

**Other California Privacy-Related Disclosures**

*Sharing Personal Information for Direct Marketing Purposes.* Before sharing personal information of California consumers with third parties for direct marketing purposes we will obtain opt-in consent from

the applicable California consumers or provide such California consumers with a cost-free method to opt out.

**California Tracking and Consent Under CIPA**

The California Invasion of Privacy Act ("CIPA") may apply to our use of cookies and other tracking technologies on the Site. For this reason, we do not deploy non-essential cookies or analytical tracking technologies in the operation of our Site unless you have provided us your affirmative consent to the use of non-essential cookies or analytical tracking technologies under our cookies consent process. See our Cookie Policy for more information about such matters.

*California Do-Not-Track and Global Privacy Control Disclosure.* At this time, the Site is not set up to honor web browser do-not-track settings. Do-not-track is a privacy preference that users can set in their web browsers. When a user activates the do-not-track settings in browsers that offer this setting, the browser sends a message to websites or applications requesting them not to track the user. For more personal information about do-not-track matters, please visit www.allaboutdnt.org. If your browser has enabled global privacy controls ("**GPC**"), we will honor the GPC settings that you have specified.

*Information on Marketing Disclosures.* California Civil Code Section 1798.83 permits our users who are California residents to request and obtain from us once a year, free of charge, personal information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this personal information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us at the address provided in Section M, "Contact Information", below.

*Content Removal Requests for Site Users Under 18 Years Old.* While this Site is not intended for users under the age of 18, if you are a Site user under 18 years of age and reside in California, you may request and obtain removal of, content or personal information that you have posted on the Site. You may send us any such requests by one of the methods specified in Section M, "Contact Information", below. We will review the request and respond promptly. You should be aware that a request to remove content or personal information posted by you on the Site does not ensure or require complete or comprehensive removal of such content or personal information from our databases.

**Complaints**

If you have any complaint about use of the Site, you may contact us by one of the methods specified in in Section M, "Contact Information", below. In accordance with California Civil Code Section 1789.3, California residents may also file complaints with the Complaint Assistance Unit, Division of Consumer Services, California Department of Consumer Affairs by postal mail at 1625 North Market Road, Suite N112, Sacramento, CA 95834 or by telephone at 800-952-5210.

**Changes to Our California Notice**

We reserve the right to amend this California Notice at our discretion and at any time. When we make changes to this California Notice, we will post the updated California Notice on the Site and update the California Notice's effective date and/or otherwise provide notice in accordance with Section H "Changes to Our Privacy Policy" above. Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.

## K. Your UK and EU Privacy Rights

Persons who are residents of any of the member countries of the European Union ("**EU**"), residents of the United Kingdom (the "**UK**") or are other data subjects covered by either the EU's General Data Protection Regulation, (EU) 2016/679 (the "**EU GDPR**") or the United Kingdom GDPR (the "**UK GDPR**", and collectively with the EU GDPR, the "**GDPR**") have certain additional privacy rights under applicable law. The following provisions of this Privacy Policy provide an overview of these additional rights.

**Legal Bases for Processing Personal Information**

When processing your personal information, Kemper may rely on one or more of the following legal bases (or other available legal grounds), depending on the circumstances:

- **Legitimate Interests.** We may process your personal information where Kemper has a legitimate interest in such processing for managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights or freedoms.
- **Consent.** We may process your personal information where Kemper has obtained your consent to the processing.
- **Contractual Necessity**. We may process your personal information where such processing is necessary in connection with any contract that Kemper has with you.
- **Legal Requirements**. We may process your personal information where such processing is required by applicable law.

**Disclosures to Third Parties**

Your personal information will not be disclosed to third parties except for where it is necessary for fulfillment of Kemper's obligations to you or where Kemper is obliged or permitted to do so by law (including, without limitation, through the terms of any agreement Kemper may have with you), or where Kemper makes disclosures that are otherwise consistent with the uses described in this Policy.

Kemper may also disclose any personal information (including personal information) relating to you to law enforcement authorities or any regulatory or government authority in response to any request including requests in connection with the investigation of any suspected illegal activities.

Kemper reserves the right to transfer any personal information Kemper has about you in the event Kemper sells or transfers all or a portion of our business or assets, or merges with another organization. Should such a sale, transfer or merger occur, Kemper will use reasonable efforts seeking to require that the

transferee uses personal information you have provided to Kemper in a manner that is consistent with this Policy.

We will not sell, resell or lease your personal information to any third parties but Kemper may, if required for the purpose(s) for which your personal information was collected and processed, share it with Kemper partners and/or service providers to enable them to provide their products or services to Kemper or to you, as applicable. The foregoing are in addition to the other uses described elsewhere in this Policy.

**Security of Personal Information of EU and UK Residents**

Kemper has policies and technical and organizational measures in place which are intended to help safeguard and protect your personal information against unauthorized access, accidental loss, improper use and disclosure. However, you should be aware that personal information transmitted over the internet is not completely secure because of the nature of the internet and that systems and measures used to secure personal information are not flawless. For these reasons, although Kemper uses reasonable efforts to help protect your personal information, Kemper does not warrant the security of personal information transmitted to Kemper or stored by Kemper, and personal information that is transmitted to Kemper by you electronically is done at your own risk.

**Retention of Personal Information of EU and UK Residents**

Our policy is to retain your personal information only for as long as is necessary to fulfill the purposes for which Kemper collected such personal information, including for the purposes of satisfying any professional, legal, accounting or reporting requirements to which Kemper is subject. To determine the appropriate retention period for personal information, Kemper considers the scope, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which Kemper collected and processed your personal information and whether Kemper can achieve those purposes through other means, and any applicable legal and professional requirements.

**International Data Transfers**

See Section L “International Data Transfers and Use of Third Parties” below, of this Policy for personal information concerning international transfers of personal information.

**Your Rights as an EU or UK Resident**

As a resident of the EU or the UK you have a number of rights concerning your personal information that Kemper holds and uses, including the following:

- **Right of Access.** You have the right to be informed about what personal information Kemper holds about you and to a copy of this personal information.
- **Right to Rectification.** You have the right to have any inaccurate personal information which Kemper holds about you updated or corrected.

- **Right to Erasure.** In certain circumstances you may request that Kemper delete the personal information that Kemper holds about you.
- **Right to Complain.** You have the right to lodge a complaint regarding the processing of your personal information to an applicable governmental or supervisory authority in your country.
- **Right to Withdraw Consent.** Where processing of personal information is based on your consent, you have the right to withdraw such consent at any time.
- **Right to Object.** Where Kemper relies on our legitimate interests to process your personal information, you have the right to object to such use and Kemper is required to discontinue such processing unless Kemper can demonstrate an overriding legitimate interest in such processing.
- **Right to Restriction.** You have the right to request that Kemper stop using your personal information in certain circumstances including if you believe that the personal information Kemper holds about you is inaccurate or that Kemper's use of your personal information is unlawful. If you validly exercise this right, Kemper will store your personal information and will not carry out any other processing until the issue is resolved.

You may exercise any of the above requests in writing to us by one of the methods specified in Section M, "Contact Information", below. You are also free at any time to request that Kemper stop using your personal information for marketing purposes by also writing to Kemper as noted above.

## L. International Data Transfers and Use of Third Parties

Your personal information that is being collected by us may be transferred for further processing, access and storage to Germany, as well as in the United States. When processed in Germany, your data will be subject to the laws of Germany and afforded protection under German and European Union data protection law. When processed in the United States, your data will be subject to US federal and state law, as well as potential access by local law enforcement.

As further detailed in the Policy, we may from time to time use third parties for some of our data processing activities. Whenever we use third parties to process personal information on our behalf, including with international data transfers to or from such third parties, we use contractual and other means to ensure that your personal information is protected in accordance with applicable legal requirements.

## M. Contact Information

To contact us about any of the matters addressed in this Policy, including to exercise any of your rights, to ask questions or to provide comments about this Policy and our privacy practices, you may contact us as follows:

- By email: info@KemperAipMetals.com
- By regular mail: Kemper AIP Metals, LLC, P.O. Box 3283, Ponte Vedra, FL 32004
- By phone: (904) 820-2820

*This Privacy Policy was last updated on and is effective as of* ***November 1, 2026****.*