

California Applicants – California Consumer Privacy Act Notice

Last Updated: January 22, 2026

This notice describes the categories of personal information collected by Marubeni-Itochu Steel America Inc. (“Company”) and the purposes for which such information may be collected and used. For additional information about the Company’s data privacy practices, please review our Privacy Policy.

Categories of Personal Information Collected

Identifiers and Contact information. This category includes names, addresses, telephone numbers, mobile numbers, email addresses, signatures, account names, dates of birth, bank account information, and other similar contact information and identifiers.

Protected Classification Information. This category includes characteristics of protected classifications under California or federal law.

Internet or Other Electronic Network Activity Information. This category includes, without limitation:

- all activity on the Company’s information systems, such as internet browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames and passwords
- all activity on communications systems, including phone calls, call logs, voice mails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an employee’s use of company-issued devices.

Geolocation Data. This category includes, without limitation, GPS location data from company-owned or issued mobile devices, applications, or vehicles.

Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information. This category includes, for example, information collected from cameras, thermometers, and similar devices.

Biometric Information. This category includes the use of biometric equipment, devices, or software to record your time worked, to enter or exit facilities or rooms, to access or use equipment, or for other business purposes.

Professional and Employment-Related Information. This category includes, without limitation:

- data submitted with employment applications, including employment history, employment recommendations, education history, etc.
- work authorization
- performance and disciplinary records
- salary and bonus data
- background check and criminal history

- fitness for duty data and reports
- benefit plan enrollment, participation, and claims information
- leave of absence information, including religious and family obligations, and physical and mental health data, concerning employees and their family members

Education Information. This category includes, without limitation, education history.

Sensitive Personal Information. This category includes sensitive information such as:

- social security, driver’s license, state identification card, passport number or work authorization documents
- financial account information that allows access to an account, including log-in credentials, financial account numbers, passwords, etc.
- precise geolocation
- racial or ethnic origin, religious or philosophical beliefs, or union membership
- content of mail, email, and text messages (unless the Company is the intended recipient of the communication)
- genetic data
- biometric information for the purpose of uniquely identifying a consumer
- health information
- information concerning sex life or sexual orientation

Inferences Drawn from the Personal Information in the Categories Above. This category includes engaging in human capital analytics, including, without limitation, identifying correlations between certain characteristics and job success, analyzing data to improve retention, and analyzing employee preferences to inform HR policies, programs, and procedures.

Purposes Personal Information, Including Sensitive Personal Information, Is Used

- Collecting and processing employment applications, including confirming eligibility for employment, background and reference checks, onboarding, and related recruiting efforts.
- Evaluating an individual’s appropriateness for a particular position at the Company, or promotion to a new position.
- Processing payroll, other forms of compensation, and employee benefit plan and program design and administration including enrollment and claims handling, and leave of absence administration.
- Maintaining physician records and occupational health programs.
- Maintaining personnel records and record retention requirements.
- Communicating with employees and/or employees’ emergency contacts and plan beneficiaries.

- Complying with applicable state and federal health, labor, employment, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws, guidance, or recommendations.
- Preventing unauthorized access to, use, or disclosure/removal of the Company's property, including the Company's information systems, electronic devices, network, and data.
- Ensuring and enhancing employee productivity and adherence to the Company's policies.
- Providing training and development opportunities.
- Investigating complaints, grievances, and suspected violations of Company policy.
- Facilitating the efficient and secure use of the Company's information systems.
- Ensuring compliance with the Company information systems policies and procedures.
- Improving safety of employees, customers and the public with regard to use of Company property and equipment.
- Improving efficiency, logistics, and supply chain management.
- Improving accuracy of time management systems and attendance, including vacation, sick leave, and other leave of absence monitoring.
- Evaluating an individual's appropriateness for a particular position at the Company, or promotion to a new position.
- Managing customer engagement and other legitimate business purposes.
- Responding to and managing legal claims against the Company and/or its personnel, including civil discovery in litigation.
- Facilitating other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, merger and acquisition activities, and maintenance of licenses, permits and authorization applicable to Company operations.

Note: To carry out the purposes outlined above, the Company may share information with third parties, such as background check vendors, third-party human resources and information technology vendors, outside legal counsel, and state or federal governmental agencies. The Company may add to the categories of PI it collects and the purposes it uses PI. In that case, the Company will inform you.

The Company does not sell or share, as those terms are defined under applicable law, the above categories of Personal Information. We also do not use or disclose your sensitive personal information for purposes that, with limited exceptions, are not necessary to maintain the employment relationship as reasonably expected by an average employee. We do not have actual knowledge that we have sold or shared personal information of minors under age 16. The Company may add to the categories of personal information it collects and the purposes it uses personal information. In that case, the Company will inform you.

We reserve the right to amend this Notice at any time without advance notice.

Retention. We retain your personal information for as long as is necessary to process your application for employment and in accordance with the Company's data retention schedule. We may retain your personal information for longer if it is necessary to comply with our legal or reporting obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, enforce our legal

agreements and policies, address other legitimate business needs, or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements. Personal information does *not* include certain categories of information, such as publicly available information from government records, and deidentified or aggregated consumer information.

Disclosure. To carry out the purposes outlined above, the Company may disclose personal information to service providers or other third parties, such as background check vendors, third-party staffing vendors, information technology vendors, outside legal counsel, and state or federal governmental agencies. The Company does not sell or share, as those terms are defined under applicable law, the above categories of personal information. The Company may add to the categories of personal information it collects and the purposes for which it uses that information. The Company will inform you in the event it does so.

California Resident Individual Rights Requests. Individuals who are residents of the State of California have certain individual rights, which are outlined below.

Right To Know About Personal Information Collected or Disclosed. As a California resident, you have the right to request additional information, beyond that disclosed above, regarding the following, to the extent applicable:

- the categories of personal information the Company collected about you
- the categories of sources from which that personal information was collected
- the categories of personal information sold or disclosed for a business purpose
- the business or commercial purposes for which that information was collected, sold, or shared
- the categories of third parties to whom the information was disclosed
- the specific pieces of personal information collected

Upon receipt of a verifiable request to know (see below), and as required by applicable law, we will provide a response to such request.

Right To Request Deletion of Your Personal Information. You have the right to request that we delete the personal information we collected or maintain about you. Once we receive your request, we will let you know what, if any, personal information we can delete from our records, and will direct any service providers and contractors to whom we disclosed your personal information to also delete your personal information from their records.

There may be circumstances where we cannot delete your personal information or direct service providers or contractors to delete your personal information from their records. Such instances include, without limitation, when the information at issue is maintained: (a) to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the Company and compatible with the context in which you provided the information, or (b) to comply with a legal obligation.

Upon receipt of a verifiable request to delete (see below), and as required by applicable law, we will provide a response to such requests.

Right to Request Correction. You have the right to request that the Company correct any inaccurate personal information we maintain about you, taking into account the nature of that information and purpose for processing it. Upon receipt of a verifiable request to correct (see below), and as required by the CCPA, we will provide a response to such requests.

Right to Limit Use or Disclosure of Sensitive Personal Information. You have the right, subject to certain exceptions, to request that we limit the use and disclosure of your sensitive personal information, as that term is defined in the CCPA. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will take appropriate steps to respond to your request.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. We will not discriminate or retaliate against you for exercising any of the rights described above.

Submitting CCPA Rights Requests. To submit a CCPA Rights request as outlined above, please contact us at **212-660-6000** or **hr@us.benichu.com**. We reserve the right to only respond to verifiable consumer requests that are submitted as instructed.

We reserve the right to amend this notice at any time without advance notice. Please direct questions about this notice to **hr@us.benichu.com**.

Spouses, Dependents, and Associates. If you have knowledge that the Company collected personal information related to your spouse, dependent, or associate, please share a copy of this notice with all such individuals.