



WIRECO CORPORATE PRIVACY POLICY

WireCo WorldGroup Inc. (“**WireCo**”) respects the privacy of our employees and contractors worldwide, and we are committed to protecting our personnel's Personal Information (defined below). This Privacy Policy applies to personal information collected from our employees and contractors who reside in the European Economic Area and the United Kingdom (each an “**Employee**” and collectively, “**Employees**”).

WireCo has implemented this Privacy Policy so that you understand:

- What information about you is held by WireCo.
- How the information will be used.
- With whom the information will be shared.
- Your choices regarding your information
- How to access your information (including how to update or correct inaccuracies).
- What safeguards are in place to protect your information.
- EU US Privacy Shield and the transfer of your information outside the EEA
- Where to address your questions or complaints on this Privacy Policy
- Changes to this Privacy Policy

1. **Information We Collect:**

Below is a list of the types of personal information we process concerning Employees. This information may vary by jurisdiction based on applicable law and will be in digital or hard copy format. This information will be referred to in this document as the “**Personal Information**”:

WireCo limits the collection of Personal Information to that which is relevant for the intended business and legal purpose as described in Section 2 below. WireCo will not store, access, transmit, retain or otherwise use an Employee's Personal Information in any way that is incompatible with the purposes for which it has been collected or stored as described in this Privacy Policy, unless such alternative use is authorized in writing by the Employee.

- 1.1 first and last name, gender, email address, home address and telephone number, mobile telephone number, date of birth, photograph, gender, salary, position, department and location; marital /civil partnership status, details of dependents and next of kin, emergency contacts
- 1.2 driver’s license or other government-issued identification information, employee number;
- 1.3 social security or other taxpayer identification number, banking details;
- 1.4 sick pay, pensions, bonus, stock options, stock ownership, wage garnishment, insurance and other benefits information, company car information;



- 1.5 date of hire, date(s) of promotions(s), work history / years of service, manager name, offer letters, performance reviews, articles, union membership, works council membership, training courses attended;
- 1.6 photograph, physical limitations, health information and special needs;
- 1.7 records of work absences (attendance, time cards), vacation entitlement and requests, salary history and expectations, performance evaluations, letters of commendation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing WireCo policies); details of any complaints or concerns raised by you;
- 1.8 where permitted by applicable law and proportionate in view of the function to be carried out by a current or prospective employee or contractor, or as otherwise lawfully authorized by a WireCo employee or contractor, the results of criminal background checks;
- 1.9 information required to comply with laws, the requests and directions of law enforcement authorities or court orders (e.g. child support and debt payment information);
- 1.10 acknowledgements regarding WireCo policies, including ethics and/or conflicts of interest policies and computer and other corporate resource usage policies;
- 1.11 date of resignation or termination, reason for resignation or termination, information relating to administering termination of employment (e.g. references).

2. **How the Information will be used:**

We process Personal Information by electronic means or through the use of manual paper filing systems, IT and electronic systems as well as through storage in data banks.

We use the Personal Information we collect from you to administer and/ or enforce the employment relationship and (if applicable) any contract with you and to comply with our legal obligations. Specifically, we use your Personal Information for the purposes set out below (the "**Purposes**").

Administer the employment / service relationship:

- 2.1 evaluate applications for employment;
- 2.2 manage all aspects of an employee's employment relationship or of a contractor's service relationship, including, but not limited to, payroll, benefits, perks, stock option grants, pensions, health and other insurance, corporate travel and other reimbursable expenses, development and training, health and safety in the workplace, absence monitoring, performance appraisal, disciplinary and grievance processes and other general administrative and human resource related processes;



- 2.3 develop manpower and succession plans;
- 2.4 maintain sickness records and occupational health programs; this includes: information that an employee or a contractor may provide on sickness absence forms as well as any doctor's notes or other documents which are provided to WireCo in connection with an employee or contractor's health;
- 2.5 protect the safety and security of WireCo personnel and property (including controlling and facilitating access to and monitoring activity in secured premises and activity using WireCo's computers, communications and other resources);
- 2.6 investigate and respond to claims against WireCo and its guests;
- 2.7 administer termination of employment and provide and maintain references;
- 2.8 maintain emergency contact and beneficiary details (which involves WireCo holding information on those you nominate in this respect);
- 2.9 comply with WireCo's contractual obligations;
- 2.10 defend itself in legal proceedings; and
- 2.11 comply with applicable laws and regulations, including judicial or administrative orders regarding individual employees or contractors (e.g., garnishments, child support payments) as well as WireCo itself (including e-discovery proceedings and disclosures) and including compliance with its legal obligations regarding security of personal information.

3. **With whom we share Personal Information:**

Personal Information is stored in hard and electronic format locally within the office of your employment as well as in the United States and other countries in which WireCo or its affiliates, agents, or third party providers have a physical presence.

With other WireCo Entities:

We share Personal Information between and among WireCo and its affiliates and subsidiaries for the management of the employment or services relationship, grant of benefits, management of budget and related purposes as described above.

With Third Party Providers in the US or Other Countries:

Like many businesses, from time to time, we outsource the processing of certain functions and/or information and Personal Information may also be shared with third party providers (e.g. medical benefit providers, stock brokerages, retirement benefit providers, legal advisors, accountants etc.) to whom WireCo has chosen to outsource work, in order to facilitate the uses described above.



For Compliance with Law:

WireCo may disclose any Personal Information we have concerning you in response to lawful requests by public authorities in any of the jurisdictions in which we operate, including in order to meet national security or law enforcement requirements, or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property. We may retain information collected and process such information to comply with accounting and tax rules and regulations and in accordance with our records retention policies.

In connection with a Corporate Restructuring or Liquidation:

As we continue to develop our business, we may be involved in a merger, asset sale, financing, corporate divestiture, reorganization, or acquisition of all or some portion of our business to another company. We may even be involved in liquidation or bankruptcy proceedings. In such events Personal Information is generally one of the transferred business assets, and as such we may share Personal Information with the relevant entity involved in the transaction or proceeding as well as to its advisors and legal counsel before and after the transaction closes or the proceedings conclude.

Additional Requirements with respect to transfers to third parties

WireCo takes reasonable and appropriate steps, including a risk assessment and a due diligence process, to ensure that a third party to which Employee Personal Data is transferred effectively processes the Personal Data transferred in a manner consistent with WireCo's obligations under the Privacy Shield Principles (see Section 8).

If, in connection with the use and processing of Personal Information, WireCo requires the use of a third party agent, and as such, must transfer such to a third party agent acting on its behalf, WireCo will enter into a written agreement with each such third party pursuant to which the third party provider shall agree: (i) to process and transfer Personal Data only for the limited and specified purposes under the agreement with WireCo; (ii) to provide at least the same level of privacy protection as is required by the Privacy Shield Principles (as defined in Section 8 below); (iii) upon reasonable notice, to permit WireCo to perform an audit at its own expense or to take other reasonable and appropriate steps to effectively processes the Personal Data transferred under the Agreement in a manner consistent with WireCo's obligations under Privacy Shield; (iv) upon notice, to take reasonable and appropriate steps to stop and remediate any unauthorized processing hereunder; (v) to permit WireCo to provide a summary or a representative copy of the relevant privacy provisions of this Agreement to the U.S. Department of Commerce upon the Department of Commerce's request; and (vi) to notify WireCo if such provider determines it can no longer meet the foregoing obligations. WireCo will take reasonable measures to ensure the third party agent's performance. If WireCo discovers through the ordinary course that the third party agent does not comply with its privacy obligations and the Privacy Shield Principles, WireCo will take commercially reasonable steps to stop and remediate the use or disclosure by such third party of Personal Information.



WireCo shall be liable for any processing of such information by such third parties that is inconsistent with the Privacy Shield Principles unless it is not responsible for the event giving rise to any alleged damage.

4. Your Choices regarding your Personal Information:

WireCo takes reasonable efforts to accommodate Employees' privacy preferences, such as restricting access to Personal Information and keeping certain Personal Information anonymous. WireCo gives its Employees the opportunity to opt out from allowing WireCo to disclose their Personal Information to a third party or to use it for a purpose incompatible with the purpose for which it was originally collected or authorized, as described in Section 2 above. To exercise this opt-out option, Employees should contact their local Human Resource Manager (see Exhibit A). WireCo shall not restrict EU employment opportunities and shall not take any punitive action against Employees based on the Employee's exercise his/her rights under this Section 4.

5. Your Access to your Personal Information:

WireCo endeavors to use Personal Information that is up-to-date, accurate and reliable for its intended use. To assist us in this you are required to let us know if any of your Personal Information changes.

Under the Privacy Shield (as set forth in Section 8 below) you are entitled in certain circumstances to access, correct, amend, or delete personal information about you that we hold where it is inaccurate, or has been processed in violation of the Privacy Shield Principles.

Upon request, WireCo will provide Employees with reasonable access to the Personal Information stored in their then-current personnel file, and will take reasonable steps to permit the Employees to correct, amend, or delete any Personal Information which is inaccurate or incomplete or which has been processed in violation of the Privacy Shield Principles. Alternatively, we may reject a request for a number of reasons, including, for example: (i) if the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question; (ii) where the rights or interests of persons other than the individual would be violated; (iii) where the request is repetitive, vexatious or fraudulent; (iv) where granting the request would interfere with the execution or enforcement of the law or with private causes of action, including the prevention, investigation or detection of offenses or the right to a fair trial; (v) where granting the request would prejudice employee security investigations or grievance proceedings or in connection with employee succession planning and corporate re-organizations; or (vi) where granting the request would prejudice the confidentiality necessary in monitoring, inspection or regulatory functions connected with sound management, or in future or ongoing negotiations involving WireCo.

If you would like access to the Personal Information in your personnel files please send a written request to your local Human Resources Manager. Contact details are provided in the schedule attached to this document.



6. **How we Protect your Personal Information:**

WireCo takes reasonable precautions to protect and safeguard Personal Information against loss, misuse, and unauthorized access, disclosure, alteration and destruction. These measures include password protection for online information systems and restricted access to Personal Information processed by the Human Resources and IT Departments. There are layered firewalls and other security technologies to help prevent unauthorized access to our system. Strong password protection protocols are used on our computers, and all employees are kept up-to-date on our security and privacy policies. The servers used to store information are maintained off site and in a secure environment with appropriate security measures.

7. **Data Retention:**

WireCo will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

8. **Cross Border Transfer of Information and Privacy Shield:**

WireCo complies with the EU-U.S. Privacy Shield Framework (collectively "**Privacy Shield**") regarding the processing of all human resources personal information it receives from the European Economic Area (EEA) member countries and the United Kingdom in reliance on the Privacy Shield. You can view our Privacy Shield certification at www.privacyshield.gov/list. You can learn more about the Privacy Shield Framework, by visiting the Privacy Shield website at <https://www.privacyshield.gov/welcome>.

WireCo has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

With respect to personal information received or transferred pursuant to Privacy Shield, WireCo is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

As part of the certification process with the U.S. Department of Commerce, WireCo conducts in-house verification of its compliance with the Privacy Shield Principles, including periodic internal compliance reviews of this Privacy Policy.

If we become subject to an FTC or court order based on non-compliance, WireCo shall make public any relevant Privacy Shield-related sections of any compliance or assessment report submitted to the FTC, to the extent consistent with confidentiality requirements.

9. **Questions and Complaints:**

In compliance with the Privacy Shield Principles, WireCo commits to resolve complaints about our collection or use of your Personal Information. If you have any questions or complaints



regarding this Privacy Policy, please contact your local Human Resources Manager. Contact details are provided in Exhibit A attached to this document.

You may also contact us at:

WireCo WorldGroup Inc.
Attn: General Counsel
2400 West 75th Street
Prairie Village, Kansas 66208 USA
Email: WireCoLegal@wirecoworldgroup.com
Phone: 816-270-4814

Any inquiries should include the individual/company name, address, and other relevant contact information (phone number, email address). WireCo will use all reasonable efforts to respond to such requests as quickly as possible.

WireCo will investigate and try to resolve any concern or issue and answer any questions raised by an Employee. If an Employee's concern escalates to a dispute, WireCo will use its best efforts to resolve the dispute internally. For complaints and disputes that cannot be resolved between an Employee and WireCo, WireCo commits to cooperate with the panel established by the EU data protection authorities (DPAs) and comply with the advice given by the panel with regard to human resources data transferred from the EU in the context of the employment relationship.

Under certain conditions, Privacy Shield provides the right to invoke binding arbitration when other dispute resolution procedures have not provided resolution. This is described in Annex I to the Privacy Shield: <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

10. **Changes to this Privacy Policy:**

This Privacy Policy is effective as of the Effective Date shown below. WireCo may revise this Privacy Policy at any time consistent with the requirements of the Privacy Shield Principles. Employees will be given appropriate notice of any changes to this Privacy Policy. If we revise this Privacy Policy, we will not use or share Personal Information in a way that is inconsistent with the Privacy Policy in effect when the Personal Information was first collected without first giving any affected Employees the opportunity to opt out from such material changes or disclosure.

WireCo will conduct compliance audits of its relevant privacy practices to verify adherence to this Privacy Policy and the Privacy Shield Principles. Any employee that WireCo determines is in violation of the Privacy policy will be subject to disciplinary action up to and including termination of employment.

Effective Date: January 9, 2019



Exhibit A

Human Resources Contacts

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