

Privacy Notice for California Residents

Effective Date: January 1, 2020

Last Updated on: January 1, 2020

1. Introduction

This Privacy Notice for California Residents supplements [AK Steel Corporation's Website Privacy Policy](#) and describes how AK Steel Corporation and its subsidiaries and affiliates (collectively, "AK Steel," "we," or "us") collect and use personal information about you if you are a natural person:

- acting as a job applicant to AK Steel;
- acting in your capacity as a current or former employee, owner, director, officer, medical staff member, or contractor of AK Steel;
- who has been designated as an emergency contact for one of the persons listed above and your information has been collected for use solely within that context; or
- whose information we need to administer benefits obtained through one of the persons listed above.

This Privacy Notice applies to the above persons who are California residents ("Covered Persons").

We adopt this Notice to comply with the California Consumer Privacy Act of 2018, as may be amended, replaced, or superseded as well as any implementing regulations (CCPA). Any terms defined in the CCPA have the same meaning when used in this Notice.

This Privacy Notice describes the categories of personal information that we collect from Covered Persons and the purposes for which the categories of personal information shall be used.

2. Categories of Personal Information We Collect

AK Steel collects 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 consumer or device ("personal information"). However, personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - 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; and

- o 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.

Specifically, AK Steel collects the following categories of information about Covered Persons:

Our Personal Information Collection Practices		
Category	Examples	Do we collect this information?
A. Identifiers	A real 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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.	YES
C. Protected classification characteristics under California or federal law.	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).	YES

Our Personal Information Collection Practices		
Category	Examples	Do we collect this information?
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, or similar information.	YES
I. Professional or employment-related information.	Current or past job history, performance information, wage and benefit information (including retirement accounts, pensions, insurance, beneficiary information, disability, vacation, and leaves of absence), payroll information, education, training, professional memberships and certifications, references, residency and work permit status, credit and criminal background checks, the results of drug and alcohol testing, vehicle registration, driving history, emergency contact information, other personal details included in a resume, CV, or cover letter, and information created, stored or transmitted using our	YES

Our Personal Information Collection Practices		
Category	Examples	Do we collect this information?
	networks, devices, computers or communications equipment.	
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

3. Why We Collect Your Personal Information

a. Generally

We may use the above categories of personal information we collect about you, for one or more of the following purposes:

- Job applicant administration, which may include:
 - Identifying and evaluating job applicants, including assessing skills, qualifications, and interests for the purposes of determining suitability for the position for which you have applied.
 - Verifying your information and carrying out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law.
 - Communicating with you about the recruitment process and your application.
 - Keeping records related to our hiring processes.

- Creating and submitting reports as required by applicable laws or regulations.
- Complying with our legal, regulatory, or other corporate governance requirements.
- Analyzing and improving our application and recruitment process.
- To inform you about and consider you for other positions that may be appropriate for you.
- Employee administration (including payroll and benefits administration).
- Processing employee work-related claims (for example, insurance claims).
- Accounting and auditing.
- Conducting performance reviews and determining performance requirements.
- Assessing qualifications for a particular job or task.
- Gathering evidence for disciplinary action or termination.
- Complying with applicable law.
- Education, training, and development requirements.
- Health administration services.
- Complying with health and safety obligations.
- For our own legitimate interests including:
 - To prevent fraud.
 - To protect and enforce our and others' intellectual property rights and to protect or defend our legal rights or property
 - To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of AK Steel's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by AK Steel about consumers is among the assets transferred.
- 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.

We will not collect additional categories of personal information or use the personal information collected for materially different, unrelated, or incompatible purposes without providing notice, and if required by law, your explicit consent.

4. Employees

If you are a current employee, this Privacy Notice does not create a contract for employment,

compensation, hours of work, or for the provision of benefits. If you are a current employee, you are employed atwill, without any definite term or duration, and your employment with us can be terminated at any time, by either party, for any or no reason.

5. Contact Us

If you have any questions about our processing of your personal information or would like to make an access or other request, please contact AK Steel by clicking [here](#).