

AMERICAN IRON & METAL

EMPLOYEE PRIVACY POLICY

Latest update: November 2023

At American Iron & Metal Company Inc. and its affiliates including, without limitation, Kenny U-Pull, AIM Delsan and AIM Solder (Collectively “**AIM**,” “**we**,” “**us**,” or “**our**”), we want our employment candidates, employees, and former employees to understand what personal information we collect, and how we use and share it. That is why we encourage you to read our Privacy Policy before applying to join our team.

1. What is the Privacy Policy and what does it cover?

This Privacy Policy applies to the collection, use, and disclosure of the personal information of our employment candidates, employees, and former employees, be it through our website at <https://aim-global.com/> (the “**Website**”) or any other interaction with us.

This Privacy Policy does not apply to the collection, use, or disclosure of our customers' personal information. Please see our Global Privacy Policy [<https://www.aim-recycling.com/privacy-policy>] for more information on this topic.

If you click through to links to third party websites or applications from our Website, this Privacy Policy does not apply to such external services. It is always a good idea to read their privacy policies to understand what they do with your information.

2. What information do we collect and why?

Generally, we collect your personal information for the following purposes:

- Managing the employment relationship;
- Administrating benefits;
- Ensuring health and safety in the workplace;
- Ensuring compliance with internal policies and processes; and
- Meeting our legal obligations.

As employees, you provide us with certain personal information because of legal and contractual requirements. Please note that failure to provide accurate information may affect your employment, as this information may be required for the performance of your employment or contract and to comply with applicable laws.

We collect the personal information described in this section directly from you as part of your application process and your employment with AIM. We may also obtain certain personal information from third parties, including from background check providers.

Below is an overview of the types of personal information we collect from employment candidates, employees and former employees.

Employment candidates

AIM collects personal information from employment candidates during the hiring process. Below is a summary of the personal information we collect and the purposes for which we may use it.

Category	Examples	Purposes of Collection
Candidate information	Full name, e-mail address, telephone number, CV, professional experience, skills, career objectives, references, and criminal record	Processing your employment application, including assessing your qualifications, checking your references and communicating with you about your candidacy Determining appropriate compensation and to comply with applicable legal requirements

Employees

Below is a summary of the categories of personal information we collect and the purposes for which we may use it when you become an employee of AIM.

Category	Examples	Purposes of Collection
Contact information and identification	identification number, social insurance number, full name, e-mail address, mailing address, and telephone number	Managing your employment, including compensation and benefits. Internal communications Legal compliance
Financial information	Banking information for direct deposit, payroll information, and tax information for payroll deductions	Managing payroll and benefits
Performance and evaluation information	Evaluation reports and performance targets	Assessing performance and professional development
Photographs and video recordings	Photographs taken for internal business purposes and video recordings from surveillance cameras	Making internal announcements about you Identifying employees and granting access to our premises Protecting our assets, detecting and responding to theft and dangerous behavior on our premises
Insurance information	Full name, date of birth, gender, address, marital status, date of hire, salary, percentage of part-time employment, social insurance number, and health-related information	Managing our benefits plan Providing you with the necessary and supplemental insurance in the event of disability or dismissal
Technical information	Personal information contained in our computer systems, communications equipment, access controls and other internal management/administration information, such as account names, passwords, login information, and your business e-mail account	Monitoring and verifying compliance with policies, procedures, and regulations.

In addition to your personal information, we may also collect the personal information of your dependents or family members. We have summarized the means and purposes of this information collection in the table below.

Category	Examples	Purposes of Collection
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Spouse and dependent information	Full name and date of birth	Providing benefits to an employee's spouse and dependents.
Emergency contact	Full name and contact information	Contacting a friend or family member in the event of an emergency.

Former employees

After your employment with AIM ends, we may still need to collect and use your personal information. Below is a summary of the categories of personal information we collect and the purposes for which we may use it.

Category	Examples	Purposes of Collection
Contact information	Full name, e-mail address, mailing address, and telephone number	Contacting you, including for suitable job opportunities based on your skills and qualifications
Financial information	Payroll and compensation information, tax information	Reimbursing expenses Accounting purposes Complying with tax requirements
Employee file	Identification number, social insurance number, full name, e-mail address, mailing address, telephone number, and evaluation reports	Complying with legal requirements and data retention obligations
Content of corporate e-mail in-box	Email correspondence	Conducting investigations or in the event of litigation Accessing information necessary for business continuity when a former or current employee who is on disability has information essential to the performance of duties stored in his or her e-mail account
Information necessary to resolve litigation	Reasons for termination of employment and any correspondence with us regarding your termination of employment	Responding to any such claims or litigation that may arise after an employee has voluntarily or involuntarily left our organization

Please note that we may also collect and use your information for any other purpose permitted or required by law.

3. How do we share your information?

We share your information with third parties necessary to fulfil the purposes identified above or where authorized by law, including as set forth in the table below:

Category	Explanations
Service Providers	We may share your information to our authorized third party services providers providing us services such as data storage and background checks.
Professional Advisors	We may share your information to our legal, financial, accounting or other consultants to the extent necessary to operate our business and comply with applicable laws.
Law Enforcement and Other authorities	We may receive requests by authorities to access your information. We will validate that the request is licit before responding. When possible, we will advise you. We will only share what is strictly required.
Commercial Transactions	We may share your information with an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an

Category	Explanations
	insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

4. How do we transfer your information?

Your information may be held at our offices or the offices of our authorized third parties described above. Some of these third parties may be based or share your information outside of your region. By submitting information to us, you consent to the communication of your information to, and the storage of that information, outside of your region. While such information is outside of your region, it is subject to the laws of the jurisdiction in which it is held, and may be subject to disclosure to the governments, courts, law enforcement, or regulatory agencies of such other jurisdictions pursuant to local laws.

However, our practices regarding your information will continue to be governed by this Privacy Policy. In addition, where applicable, we comply with legal requirements providing adequate protection for the transfer of information to other regions.

If you would like more information about how we transfer your information, please contact us as set forth in the section below “How to contact us?”

5. How do we secure and keep your information?

We implement physical, administrative and technical safeguards designed to preserve the confidentiality, integrity and security of information under our control. However, information transmitted on the Internet and/or stored on systems attached to the Internet is not 100% secure, and no security can provide absolute protection. As a result, we do not ensure, warrant or guarantee the security or integrity of such information.

We take steps to ensure that only those who need access to your information to perform their duties have access to it.

We retain your information only for as long as is necessary for us to fulfil the relevant purposes specified in this Policy and to comply with our legal obligations.

6. What are your rights regarding your information?

Under certain circumstances and subject to applicable data protection laws, supported by a written request and proof of identification, you may consult the personal information that we have collected, used or shared, and/or ask that it be corrected, and/or withdraw your consent to our disclosure or use of personal information collected.

As required or permitted by law, you may be entitled to additional rights, including: (i) the right to control the dissemination of your personal information; (ii) the right to receive computerized personal information collected from you in a structured, commonly used and technological format and to have this information transferred directly to another organization; (iii) the right to be informed of and submit observations regarding automated decision-making; and (iv) the right to request information about data processing.

Finally, you also have a right to lodge a complaint with a competent data protection authority, in particular in the region where you normally reside, where we are based or where an alleged infringement of data protection law has taken place, such as the *Commission d'accès à l'information du Québec*.

To exercise any of these rights, please contact us as set forth in the section below “How to contact us?”

7. How will you know this Privacy Policy has changed?

From time to time, we may update this Privacy Policy. Any changes will be effective when we post the revised Privacy Policy. This Privacy Policy was last updated as of the effective date listed at the top. We will notify you of any changes to this Privacy Policy.

8. How to contact us?

If you have any questions, requests, or complaints regarding your information or this Employee Privacy Policy, please contact our Privacy Officer at:

Herbert Black, CEO
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