

PRIVACY NOTICE:

We, the management board and authorized representatives of the private company incorporated under Dutch law Century Aluminum Vlissingen B.V., having its corporate seat in Amsterdam and its principal place of business in 4389 PB Ritthem (Vlissingen), the Netherlands, at Frankrijkweg 2a (Haven 5977), hereinafter referred to as "Century Aluminum"), respect your privacy and process your general and special personal data in accordance with the statutory requirements. We inform you about this in this Privacy Notice.

General:

This privacy notice applies to the processing of your personal data by the following enterprise(s):

- the private limited company incorporated under Dutch law Century Aluminum Vlissingen B.V., having its corporate seat in Amsterdam and its principal place of business in 4389 PB Ritthem (Vlissingen), the Netherlands, at Frankrijkweg 2a (Haven 5977).

By means of this privacy notice, we clarify how and for which purposes we process your general and special personal data. We act as the data controller with regard to the processing of your general and special personal data, as described in this privacy notice. As of 25 May 2018, the processing of your general and special personal data is subject to the General Data Protection Regulation (GDPR).

Personal data

We process or may process the following general personal data about you:

- First name, last name, date of birth, citizen service number (*bsn*), civil status;
- Address, email address, fixed-line telephone number, mobile telephone number, IP address or other contact details.

If you come to work for us, whether through a temporary employment agency, under an employment contract or contract for professional services or otherwise, we ask you to declare digitally that you grant us permission to process all data that you provide us with. Apart from the general personal data mentioned above, we process or may process the following general and special personal data about you:

- The number of your passport or European identity card and the date it expires;

- The number of your driving licence, the categories for which it has been issued and the date it expires;
- Photographs and moving images obtained with our surveillance cameras;
- Your bank details;

Purposes and legal grounds for the processing of general and special personal data

We process your general and special personal data for the following purposes:

- To be able to contact you by telephone if you want us to;
- To be able to contact you in writing or electronically;
- To perform the contract concluded with you or agreements made with you;
- In connection with our customer and supplier administration;
- In connection with the improvement of our services, the management of our commercial relationships and for marketing purposes;
- For the administration and management of the persons that work for us;
- With an eye to our statutory obligations;
- To protect society and ourselves;

We process your general and special personal data based on one or more legal grounds, namely:

- You have given your express consent to the processing;
- The processing is necessary to perform the contract concluded with you or agreements made with you;
- The processing takes place for the purposes of the legitimate interests that we pursue, which may consist of performing our business operations and looking out for our commercial interests, improving our services, maintaining and improving our market position, protecting our business and its shareholders, protecting the persons working at our business, customers and suppliers, or for administrative purposes.

We will not use your general and special personal data for other purposes without your consent.

Third parties:

For the processing of personal data and pursuing the purposes specified above, we may use the services of a third party, who will only act as processor on our instructions and on our behalf. Processors work on the basis of a processing agreement concluded with them, in which we instruct them to offer sufficient guarantees regarding the protection of your data and the exercise of your rights as a data subject. We ensure that your personal

data are only processed or managed within the European Area and not outside this area without your consent.

In certain specific cases, we, as a security company, may be forced to provide personal data to the government, government agencies such as the police, fire brigade and/or care providers, statutory bodies and/or supervising authorities.

In all other respects, we will not provide your data to third parties, unless the provision of data is necessary to perform a contract or to comply with a court order or statutory obligation.

Rights of data subjects:

As proprietor of your personal data (data subject), you have the rights as specified in the GDPR. If you wish to exercise one or more of these rights, you may send us a request. We will comply with your request as soon as possible, but in any case within four weeks, unless the GDPR, the law or any regulations based on it dictate otherwise. Your rights are:

- Right of access: You may ask us to provide you with a specification of the personal data about you that we process and manage.
- Right to rectification: You may ask us to rectify your personal data if we use your personal data incorrectly.
- Right to be forgotten: You may ask us to erase your data from our files.
- Right to data portability: You may ask us to transfer your personal data to a body to be designated by you.

Website visits and cookies:

Our website does not use any so-called social plug-ins with links to social networks or websites such as Facebook, LinkedIn, Twitter or YouTube.

We do not distribute newsletters.

Security measures:

We have taken several appropriate technical and organisational measures to protect your personal data, including measures against unlawful access, unlawful use, unlawful alteration, unlawful and accidental destruction and accidental loss. Your personal data will only be consulted or processed by employees within our company that need to have access to them given their position. Our employees are subject to a duty of confidentiality. We have also taken measures with regard to third parties. For instance, we have concluded a processing agreement with each third party that processes your

data. In this agreement, the purpose for processing is set out, as well as agreements on the level of the technical and organisational security measures.

Data retention period:

We will not keep your personal data longer than necessary for the purpose for which they are processed. You may contact us for information about the period during which we retain your data.

Questions, comments or complaints:

We appreciate your questions and comments regarding this privacy notice. If you feel that this privacy notice is not observed or if you have a complaint about the manner in which we use your personal data, you can notify us in writing or electronically (hans.dejonge@centuryvlissingen.nl). You may also submit a complaint to the Dutch Data Protection Agency, using its site.

Century Aluminum has adopted this privacy notice on 15 August 2018. Century Aluminum is entitled to make additions and/or amendments to this privacy notice. You can find the most recent version of this privacy notice on www.centuryvlissingen.nl.