
 AMERICAN FURUKAWA Corporate Policy	Last Updated: July 11, 2023	Department: Compliance
	Effective Date: July 11, 2023	Policy Number: CCC-2301
American Furukawa, Inc. Privacy Policy		Approved By: CCC

This Privacy Policy describes how American Furukawa, Inc. and its affiliates ("AFI," "we," or "us") collects and processes personal information in relation to your use of our services and website, <https://americanfurukawa.com/>. If you do not agree to this Privacy Policy, your choice is to not utilize our services or website or provide personal information in connection with them. By utilizing our services and website, you agree to this Privacy Policy and expressly consent to the processing of your personal information according to this Privacy Policy.

If you are a California resident, please review our [Privacy Notice for California Residents](#) to understand how we process California residents' personal information and how to exercise your rights. If you are a resident of the European Economic Area ("EEA") or the United Kingdom, please review our [EEA/UK Privacy Policy](#).

This Privacy Notice addresses the following topics, briefly summarized below, in greater detail:

1. [Personal Information We Collect](#).
 - We collect your personal information that you choose to give to us, automatically using our website, and through third parties.
2. [How We Use Information We Collect](#).
 - We use your personal information for legitimate business purposes, including the purpose for which you provided it, to offer our services, and to advertise to you.
3. [Disclosing, Sharing, and Selling Information](#).
 - We may disclose your personal information to categories of third parties identified below for a business purpose. AFI has not sold or shared such information for the purposes of targeted advertising in the prior 12 months.
4. [Information Security and Data Retention](#).
 - We take reasonable measures to protect your personal information. We retain your personal information for the length of time required to achieve the purpose for which it was collected, in addition to other legally required periods as applicable.
5. [Cookies and Tracking Technologies](#).
 - We use automated data collection technologies to collect personal information.
6. [Job Applicant Personal Information Collection and Use](#).
 - When you apply for a job at AFI, we work with third parties to collect and process your personal information, as identified below, in the course of assessing your candidacy.
7. [Other Important Information](#).
 - We assume no responsibility for the content, privacy policies, or practices of any third-party websites. We do not target or collect personal information of children under 18. We will notify you of material changes to this Privacy Notice.
8. [Contact Information](#).
 - Please contact us if you have questions regarding this Privacy Notice.

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1. Personal Information We Collect.

A. Information You Choose to Give Us

- Contact information, including name, employer name, address, city, state, zip code, email address, and telephone number.
- Information provided or accessed in connection with the services we provide, including online forms, account information, survey responses, communications with our online support team.
- Payment information to complete purchase transactions.
- Information required to process job applications and evaluate employee candidates, and other information which you may choose in the application process, such as within an application or resume.

B. Information Automatically Collected by Using Our Website


- Your device data and how you interact with our website, including IP address, browser type, and unique device identifier.
- Cookies and similar technology. Please review the cookie technology section below for more information.
- Usage information, including the pages or content you view and searches on our website.

C. Information We Collect from Third Parties

- Background investigations obtained in connection with your employment or application for employment with AFI.
- Driving record checks obtained in connection with your duties, or prospective duties, associated with your AFI employment or prospective employment.

2. How We Use Information We Collect. We may process this information to:

- Fulfill or meet the reason you provided the information. For example, if you provide your personal information to purchase our services, we will use that information to process your payment and facilitate delivery. We may also save your information for these purposes.
- Provide, offer, support, personalize, or develop our website and services.
- Create, maintain, customize, and secure your account with us.
- Process your requests, purchases, transactions, and payments and prevent transactional fraud.
- Provide you with support and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.

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- Help maintain the safety, security, and integrity of our website, services, databases, and other technology assets.
- Test, research, analyze, and conduct product development to develop and improve our website, and related services.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- Communicate with you about your job application with us and evaluate your potential employment with us.
- Send promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences.
- Personalize, measure, and improve our advertising to you.
- Fulfill any other use that we describe when you provide the information.


3. **Disclosing, Sharing, and Selling Information.**

A. Disclosing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We disclose personal information with the following categories of third parties for the listed business purposes:

- with service providers and other third parties we use to support our business, including those that help us provide our website and services to you and those that facilitate our employment relationships, such as the administration of employment benefits.
- with Software/IT service providers we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- with banks and credit card processors to the extent necessary for AFI to deliver its services.
- when we believe sharing is necessary to protect our rights, preserve safety, investigate fraud or other wrongdoing.
- when required by law, which includes complying with any court order, law, or legal process, including responding to a government or regulatory request.

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- in connection with the sale, transfer, or financing of AFI’s business or its assets, including a bankruptcy proceeding or to our affiliates.
- to enforce or apply our agreements, including for billing or collection purposes.
- for any other purpose we disclose to you when you provide the information.

B. Sharing Personal Information for Personalized Advertising

In this Privacy Policy, "sharing" means disclosing personal information to third parties for the purpose of personalized advertising. In the preceding twelve months, AFI has not shared personal information with third parties for the purposes of personalized advertising.

C. Selling Personal Information

In the preceding twelve months, AFI has not sold personal information to any third parties and does not sell personal information pertaining to minors under the age of 16.

4. Information Security and Data Retention.

We use reasonable administrative, technical, and physical security to protect the personal information we retain and to help ensure that it is used in accordance with this Privacy Policy.


Specifically, when we collect payment information from you, we employ reasonable security measures to protect your personal information in accordance with Payment Card Industry Data Security Standard (PCI-DSS) requirements as applicable.

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless longer retention is required by law or for auditing purposes. To determine the appropriate retention period for personal information, we consider applicable laws and the purpose of the personal information in question.

5. Cookies and Tracking Technologies.

A. Cookies

Our websites may use “cookies” and other tracking technologies to gather information about your interactions. This information may include demographic data, browser type, IP address, pages visited, activities conducted on the page, and the day and time of your visit. Our websites may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to make your experience on the website more personal and interactive. We do not currently honor “do not track” signals from a web site browser. Please refer to your computer browser help instructions for more information on cookies and other related technologies and how to manage their use. If you refuse or delete cookies, you will need to repeat the process if you use another computer or change browsers. If you refuse or delete cookies, some of the functionality of our websites could potentially be impaired.

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B. Analytics Services

Please note that we use an analytics service, Google Analytics, to gather information about our website visits. To learn more about Google Analytics, including opting out of Google Analytics, click here <https://tools.google.com/dlpage/gaoptout?hl=en>

C. Web Beacons

Pages of our websites may also contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that allow us, for example, to count users who have visited those pages. We may use this information to provide a better website user experience, and tailor our marketing communications.

6. Job Applicant Personal Information Collection and Use.

When you apply for a position with AFI, you will be asked to provide us, or our designated vendor, with your personal information that will be used to assess your skills in relation to the applicable job requirements. We may also use your personal information to contact you during the hiring process.

ADP, LLC is AFI's designated vendor to assist us in our hiring process. This vendor may collect personal information directly from you, and then share it with us. Please refer to ADP, LLC's Privacy Statement for Client Employees, found [here](#), to understand its personal information handling practices.

The following are examples of personal information that may be collected in the hiring process: name, address, employment history, race and ethnicity (only if required by law), transcripts, driver's license number, and government-issued ID.


Except as required by law, we do not collect or process any sensitive personal information as defined under applicable law as part of our hiring process. Therefore, we ask that you do not disclose or otherwise send this information to us or our designated vendor, unless specifically asked pursuant to a legal requirement to which AFI is subject.

Job applicant personal information is secured and retained according to the "Information Security and Data Retention" section of this privacy policy. We do not sell the personal information of job applicants. If you are a California resident, you have additional rights under the CCPA which are detailed in the "[Privacy Notice for California Residents.](#)"

7. Other Important Information.

A. Linked Websites

Our websites may contain links to other websites. We assume no responsibility for the content, privacy policies, or practices of any third-party websites. You expressly relieve AFI from any and all liability arising from your use of any third-party website, and from your use of, or reliance on, the content of any third-party website.

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B. Children's Privacy

Our website does not target or knowingly collect any information from individuals under the age of 18.

C. Changes to our Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page with a notification that the Privacy Policy has been updated on our website home page. If we make material changes to how we treat the personal information we collect, we will notify you through a prominent notice on our website home page, in addition to any other means necessary to fulfill our legal requirements. The date the Privacy Policy was last revised is identified at the top of the page.


8. Contact Information.

For questions regarding this Privacy Policy, you may contact us via any of the following methods:

Telephone: 800-605-8275

E-mail: afi-pi@americanfurukawa.com

Mail: 47677 Galleon Drive, Plymouth, Michigan USA 48170

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PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last Updated: July 11, 2023


This Notice applies solely to individuals who reside in the State of California and supplements our Privacy Policy. To exercise any of the rights described below consistent with California law, please follow the instructions provided in the "[Exercising Your Rights](#)" section of this document.

1. Personal Information We Collect.


We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“**personal information**”).

In the last twelve months, we have collected and/or disclosed the following categories of personal information from consumers:

Category	Examples	Collected	Disclosed
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	YES
Personal information categories listed in the California Customer Records statute.	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	YES
Protected classification	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital	YES	YES

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characteristics under California or federal law.	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).		
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	NO
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	NO
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	NO
Geolocation data.	Physical location or movements; in this instance, general location information obtained in connection with IP address use.	YES	NO
Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES	NO
Professional or employment-related information.	Current or past job history or performance evaluations.	YES	NO
Non-public education information (per	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class	YES	NO

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the Family Educational Rights and Privacy Act).	lists, student schedules, student identification codes, student financial information, or student disciplinary records.		
Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	NO
Sensitive Personal Information.	(1) Social Security number, driver’s license number, state identification number, passport number; (2) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (3) precise geolocation information; (4) racial or ethnic origin, religious, or philosophical believes, or union membership; (5) contents of mail, email, and text messages unless the business is the intended recipient of the communication; (6) genetic data; (7) biometric data for the purposes of uniquely identifying a consumer; (8) health information; (9) sex life or sexual orientation information.	YES	YES

We obtain the information from the various categories of sources:

- Directly from you. For example, from your application for employment with us and any supporting materials, like a resume, that you may submit in support of your application.
- Indirectly from you. For example, obtaining your IP address from which you visit our website or which is associated with your company-issued equipment.


2. How We Use, Disclose, Share, and Sell Personal Information We Collect.

Please read our general Privacy Policy to learn how we use, disclose, share, and sell the personal information we collect.

3. Your Rights.

A. Right to Access and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your consumer request, we will disclose to you:

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- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting, selling, or sharing the personal information.
- The categories of third parties with whom we disclose that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- Whether we sold, shared, or otherwise disclosed your personal information for a business purpose.

B. Right to Delete


You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us to:

- Complete the transaction for which we collected the information.
- Provide a good or service that you requested.
- Take actions reasonably anticipated, given our ongoing business relationship.
- Fulfill a written warranty or product recall conducted under federal law.
- Perform our contract with you.
- Protect against malicious, deceptive, fraudulent, or illegal activity.
- Debug products to identify and repair errors that impair existing functionality.
- Exercise free speech or ensure that other consumers may exercise their free speech.
- Comply with the California Electronic Communications Privacy Act.
- Engage in public or peer-reviewed public interest research if deletion may seriously impair the research’s achievement and if you previously provided informed consent.
- Use the information internally, as reasonably expected by consumers.
- Use the information internally, compatible with the law and context you provided it.
- Comply with a legal obligation.

C. Right to Correct

You have the right to request that we correct inaccurate personal information, taking into account the nature of the personal information and the purposes for processing the personal information. Once we receive and confirm your consumer request, we will use commercially reasonable efforts to correct the inaccurate personal information.

D. Right to Non-Discrimination

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We will not discriminate against you for exercising any of these rights. Unless permitted by California law, we will not:

- Deny you goods or services.
- Provide you a different level or quality of goods or services.
- Charge you different prices or rates for goods or services, including granting discounts or benefits, or imposing penalties.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by California law that can result in different prices, rates, or quality levels. Any permissible financial incentive we offer will reasonably relate to your personal information’s value and contain written terms that describe the program’s material aspects. Participation in a financial incentive program requires your prior affirmative consent, which you may revoke at any time.

E. Right to Opt Out of the Sale of Personal Information

AFI does not sell personal information.

F. Right to Opt Out of Sharing Personal Information for Personalized Advertising

AFI does not share personal information for personalized advertising.

G. Right to Limit the Processing of Sensitive Personal Information

AFI does not process sensitive personal information beyond what is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.

H. Rights Under California's "Shine the Light" Law


California’s “Shine the Light” law (Civil Code Section § 1798.83) permits California residents that use our website to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes.

4. Exercising Your Rights.

To exercise the above rights compatible with California law, please submit a consumer request via 800-605-8275 or afi-pi@americanfurukawa.com.

A. Identity Verification

Your consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected information and describe your request in sufficient detail that allows us to properly respond to it. We cannot respond to

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your request if we cannot verify your identity and confirm that the information relates to you.

Only you, or someone legally authorized to act on your behalf, may make a consumer request related to your personal information. To designate an authorized agent, please contact us via the methods noted above. If you are a California resident, you can designate an authorized agent to make a request on your behalf only if: (1) the authorized agent is a natural person or a business entity registered with the Secretary of State of California; and (2) you sign a written declaration that you authorize the authorized agent to act on your behalf. If you use an authorized agent under California law to submit a request to exercise your rights, please have the authorized agent take the following steps in addition to the steps described above:

- Mail a copy of your signed written declaration authorizing the authorized agent to act on your behalf; and
- Provide any information we request in our response to your email to verify your identity. The information requested will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to California Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

California residents may make a consumer request twice within a 12-month period, free of charge, unless the request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.


B. Response Time

We will respond to consumer requests in the time allotted under California law, within forty-five (45) days of receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing prior to expiration of the initial 45-day period.


C. Response Content

Any disclosures we provide will only cover the 12-month period preceding our receipt of the consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance in compliance with California law.

D. Method of Response

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You do not need to create an account with us to make a consumer request. However, if you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

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EEA AND UK PRIVACY NOTICE

This supplemental privacy notice ("**EEA & UK Notice**") provides European Economic Area ("**EEA**") and United Kingdom ("**UK**") individuals additional information required by the EU General Data Protection Regulation and UK General Data Protection Regulation. These provisions, together with the statements in the above American Furukawa, Inc. Privacy Policy ("**Privacy Policy**"), set forth our practices with regard to EEA and UK personal data. For EEA and UK individuals, if there is a conflict between this EEA & UK Notice and the Privacy Policy, this EEA & UK Notice governs.

Contact information:

American Furukawa, Inc. ("AFI") contact information:

- 800-605-8275
- afi-pi@americanfurukawa.com
- 47677 Galleon Drive, Plymouth, Michigan USA 48170

AFI is based in the United States. This EEA & UK Notice sets forth our reasons for processing your personal information. Certain capitalized terms used but not defined in this EEA & UK Notice shall have the meanings set forth in our Privacy Policy.

Legal basis and purposes for data processing:

We only process personal information when we have a legal basis for the processing and have your consent. We may also process your personal information for the purposes of our own legitimate interests or for the legitimate interests of others so long as that processing does not outweigh your rights and freedoms. Specifically, we will only process your personal information as follows:

- With your consent.
- For the reason you provided it to us, including to provide any services requested.
- Pursuant to a contract with you.
- To comply with our legal obligations.
- To protect the vital interests of the data subject or another natural person.
- When such use is necessary to perform a task performed in the public interest.
- To serve our legitimate interests, including, but not limited to, marketing and improving our products and services.

Automated decision-making and profiling:


AFI does not engage in automated decision-making or profiling.

Personal information requirements:

To engage with our services and website, you may be required to provide certain personal information to enable us to perform the services. Over the course of your relationship with AFI, you will be provided with information regarding which data elements are required.

Your rights:

You have choices regarding how we use your personal information. You are entitled to:

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The right to access: You have the right to request copies of your personal information. We may charge you a minor fee for this service.

The right to rectification: You have the right to request that we correct any information that you believe is **inaccurate**. You also have the right to request that we complete information that you believe is incomplete.

The right to erasure: You have the right to request that we erase your personal information under certain **conditions**.

The right to object to processing: You have the right to object to our processing of your personal information, under certain conditions.

The right to data portability: You have the right to request that we transfer the data we have collected to **another** organization, or directly to you, under certain conditions.

In addition, when AFI provides its services or acts as a data processor, we may receive your personal information from third parties as needed to provide our services. If AFI is processing your personal information as a data processor, we will refer you to our client for assistance with these requests. We support our clients with responding to requests as required by law.

You may also decline our marketing communications.

To exercise these rights, please contact us at the address above. Note that for your protection, we may need to verify your identity before we can process your request.


If you believe that we have violated applicable law in our processing of your personal information, please contact us at afi-pi@americanfurukawa.com or contact a supervisory authority.

International Transfers:

Any personal information collected through the website or in the course of AFI's operations, including that of individuals residing outside of the U.S., is processed in the United States by us or by a party acting on our behalf. When you provide personal information to us, you consent to the processing of your data in the United States.

Data Retention:

Your personal information will be retained for as long as the information is needed for the purposes set forth in our Privacy Policy and this supplemental EEA & UK Notice and for any additional period that may be required or permitted by law. The retention period depends on the purpose(s) for which the data was collected, how it is used, and applicable law. You may request that we delete your personal information by contacting us via the information above. If we do not have a legal basis for retaining your information, we will delete it as required by applicable law.

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