

[September 25, 2025]

Hydro North America Website Privacy Policy

Here you will find the privacy policy and notice that apply to our website and related data processing activities.

Last Updated and Effective: September 25, 2025

This privacy policy ("Privacy Policy") applies to Hydro Extrusion USA, LLC and its North American affiliates, including Hydro Aluminum Metals USA, LLC and Hydro Precision Tubing USA, LLC ("Hydro North America"). It applies to all information collected by Hydro North America through its websites where this Privacy Policy is posted. It also applies to certain information that Hydro North America collects through offline methods. Unless otherwise indicated, this Privacy Policy does not apply to any of Hydro North America's affiliates in countries outside the U.S., Canada or Mexico, or to any information those affiliates disclose to Hydro North America. For individuals in Mexico, the controller of the information described in this Privacy Policy is the individual's hiring entity (Hydro Precision Tubing Reynosa, S. de R.L. de C.V. or Hydro Precision Tubing Manufacturing Monterrey, S. de R.L. de C.V.) in conjunction with their joint controllers in the United States (Hydro Precision Tubing USA, LLC or Hydro Precision Tubing Monterrey, LLC). All controllers may be reached at 6250 North River Rd., #5000, Rosemont, IL 60018.

This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it, as well as your choices regarding use, access and correction of your information. This Privacy Policy is in addition to other privacy policies and notices in effect at Hydro North America.

1. Collection and Processing of Your Data

When visiting the site, some general identifiable information is retained and processed by Hydro North America. We may also collect or create data (including aggregated or anonymous information) from usage activity on our site, to help us better understand and improve the site's features and functionality.

If you submit information into contact fields or provide comments, or log in to sections on the webpage, the data that you voluntarily provide will be processed by Hydro North America and/or its affiliates depending on which part of the site you are visiting.

We do not store the data longer than necessary to fulfill the purposes for which the data was collected.

2. Why We Process Your Data

We process your data collected from the site and from our interactions with you for the following purposes:

- **Fulfill contact requests and perform contracts:** If you have submitted a contact form, we use your data in order to answer your specific request. We also process the information you provide as our customer, supplier, or business partner in connection with doing business with you. In addition to your professional contact details, this includes information exchanged, like emails, orders, requests regarding products or specifications, and payment data.
- **Registration:** If you register with one of Hydro North America's business units online, they may use this information to provide you with customized information about Hydro North America's offering for your business needs.
- **Recruitment:** If you apply for a position with us, or express interest in working for us, your data will be processed in accordance with the policy regarding processing of personal data of individuals outside our organization (external/third parties) located at [Privacy Policy | Hydro](#) and the One Data Privacy Statement when creating an account on our recruitment platform ([Career Opportunities: Create an Account](#)).
- **Advertising and marketing:** At times, we conduct online surveys to gain a better understanding of the needs and profile of our visitors. When we conduct a survey, we will let you know how we will use the information at the time we collect information from you on the internet. We may also send postcards to customers or potential customers who we think may be interested in our goods or services. We may also use information about your activity on our website to understand how you use the site and the effectiveness of our advertising campaigns, or to provide more relevant and tailored advertising to you regarding our services.
- **Legal compliance and exercising legal rights:** We may process your data to comply with applicable laws, and respond to and cooperate with legal or regulatory requests and investigations. We may also process your data in connection with seeking legal advice from our external lawyers or in connection with litigation or exercising our legal rights.

3. How We Collect Your Data Using Cookies When Visiting Our Website

A cookie is a small text file or other persistent file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as log-in, language, font size and other display preferences) over a period of time, so you do not have to re-enter them whenever you return to the site or browse from one page to another. Cookies also allow us to determine if you perform specific actions on our website. For example, they allow us to know that you have accessed a page or clicked a link.

4. Our Website Sets the Following Types of Cookies on Your Computer:

Individual preferences: We use cookies to store your preferences, such as information you type into forms. We may also use cookies to optimize the content that we show to you.

Advertising and analytics: We use cookies to understand how you interact with our website (such as what pages you access, and whether our ads are effective), and to show our ads on other sites with the help of our advertising partners.

You can control and manage cookies. For example, you can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. Please note, if you do this, your user experience may be impaired (e.g., manually adjust some preferences every time you visit a site, and some services and functionalities may not work). Our site may not respond to browser “Do-Not-Track” signals. Please note that “Do Not Track” is a different privacy mechanism than the “Global Privacy Control” browser choice referenced below in the California section for “‘Sales’ and ‘Sharing’ of Personal Information,” which is a browser-based control that indicates whether you would like to opt-out of processing of your personal information for certain online behavioral advertising or analytics purposes. To help manage your cookie preferences, Hydro North America websites have a “Your Privacy Choices” at the bottom of the webpage.

5. To Whom We Disclose Your Data

We may disclose certain data to the following types of entities or in the following circumstances (where applicable):

- **Internally:** to affiliates of Hydro North America. When you contact us through our contact forms, we may disclose your data to other Hydro North America entities to be able to respond to your request. We may also disclose your company name, contact person’s name, address, contact details like phone number and email address, and information on purchase orders to other Hydro North America affiliates involved in a transaction with you to carry out our provision of goods or services.
- **Goods & Service Providers:** to entities that process your data on Hydro North America’s behalf in providing goods or performing services for Hydro North America. They may also help us provide goods or services to you, including processing orders or warranty claims. We may also disclose non-directly identifying information such as your internet network and device activity data on our websites, or “hashed” or encrypted versions of your email address and phone number, to our advertising platforms and analytics providers to provide you with more relevant Hydro North America ads or to better understand your use of our websites. We may also disclose aggregate or anonymous information to others to illustrate trends, etc.
- **Legal compliance and exercising legal rights:** if we believe disclosure is necessary or appropriate: (i) in connection with any legal investigation; (ii) to comply with applicable laws or to respond to legal, judicial, administrative or regulatory process; (iii) to protect the rights, property, or safety of Hydro North America, our customers, or others; and/or

(iv) to investigate or assist in preventing any violation or potential violation of applicable law, this Privacy Policy, or any of our Terms & Conditions or agreements with you, which includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

- **Business Transaction Purposes:** to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Hydro North America's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, or in anticipation of such transaction through due diligence in which information held by Hydro North America about our customers, suppliers, business partners, and users of our services (including our websites) is among the assets transferred or disclosed.
- **Consent:** with your consent and as permitted by law, we may disclose your data to any other third parties in any other circumstances. If you are located in Mexico, the disclosures above are exempt from the requirement to obtain consent, since they are considered "permitted transfers" under Mexican data protection legislation, as they are necessary to maintain and fulfil our legal relationship with you (provide you with goods and services) or are required under applicable law.

6. Data Retention

The data we collect from you will be retained for as long as necessary to satisfy the purposes for which it was collected and our legal obligations. As described above, these purposes include our business operations and complying with reporting, legal and accounting obligations. In determining how long to retain information, we consider the amount, nature and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes in other ways, the applicable legal requirements, and our legitimate interests.

7. Children's Privacy

This site is not intended for use by children under the age of 13. If we discover that a child under the age of 13 has provided us with "personal information" as defined under applicable children's privacy laws, we will take appropriate steps to promptly delete it.

8. How We Protect Your Information

We maintain organizational, technical, and physical safeguards to help protect the information we collect and use. These safeguards vary depending upon a variety of factors including the sensitivity of the information we collect and use. Despite all reasonable practices, no security method is infallible.

9. Transfer of Personal Information to Other Jurisdictions

Hydro North America is headquartered in the United States, and your information may be transferred and processed within the United States, Canada, and Mexico as part of our normal business operations. Data protection laws vary from country to country, and may be different from the country from where you access our websites. For example, data we store may be accessible to law enforcement and national security authorities under certain circumstances. By using our websites, you consent to the transfer and processing of your information by Hydro North America and our partners and service providers who perform services on our behalf as described in this Privacy Policy.

10. Links To Other Websites

Our websites may provide links to other websites for your convenience and information. These websites may operate independently from us. Linked sites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not owned or controlled by Hydro North America, we are not responsible for the sites' content, any use of the sites, or the privacy practices of the sites.

11. California Privacy and Notice at Collection

How We Handle Your Personal Information

The California Consumer Privacy Act, as amended from time to time (CCPA) requires that we make certain disclosures to California residents. The section below lays out this information in the manner specified by the CCPA, but does not differ in substance from the information above in our Privacy Policy. In the following sections, the terms "personal information" and "sensitive personal information" have the meanings set forth in the CCPA.

Categories, Purposes of Use, and Disclosures of Personal Information

The following table provides information about our practices in the 12 months leading up to the effective date of this Privacy Policy in relation to the categories of personal information that we generally collect from California residents, including categories of sensitive personal information, the purposes for which we use the information, and the categories of third parties to whom we disclose personal information for a business purpose or to whom we "sell" or "share" personal information for "cross-context behavioral advertising."

We provide personal information (as defined by the CCPA) to advertising providers for targeted advertising purposes, or use analytics partners to assist us in analyzing use of our services and our user/customer base. These disclosures may be considered a "sale" of your personal information or "sharing" of your personal information for purposes of "cross-context behavioral advertising" under the CCPA. The categories of personal information we currently "sell" or "share" are indicated in the table below. We mean the CCPA definitions of "sell" and "share" in this Privacy Policy only when these terms appear in quotes.

Category of Personal Information Collected	Categories of Sources of Personal Information	Purposes of Use	Categories of Third Parties to Whom We Disclose this Personal Information	Categories of Third Parties to Whom We “Sell” or “Share” this Personal Information
Contact and account information	You; Affiliated entities; Service providers; Sales partners; Advertising or marketing partners; Data partners	Provide services; Business operations; Communicate with you; Marketing and advertising; Improve services; With your consent	Affiliated entities; Service providers; Advertising partners; Connected third-party services; Entities for legal purposes; Entities for business transactions	Advertising partners; Analytics providers
Financial and transactional information	You; Sales partners	Provide services; Business operations; Communicate with you; Marketing and advertising; Improve services; With your consent	Affiliated entities; Service providers; Entities for legal purposes; Entities for business transactions	We do not “sell” or “share”
Customer service interaction information	You; Affiliated entities; Service providers; Sales partners	Business operations; Communicate with you; Improve services; With your consent	Affiliated entities; Service providers; Entities for legal purposes; Entities for business transactions	We do not “sell” or “share”
Surveys	You	Business operations; Communicate with you; Marketing and advertising;	Affiliated entities; Service providers; Entities for legal purposes; Entities for	We do not “sell” or “share”

		Improve services; With your consent	business transactions	
Employment application information	You	To process your employment application and for our legal purposes	Affiliated entities; Service providers; Entities for legal purposes; Entities for business transactions	We do not “sell” or “share”
Information collected through automated technologies (including internet network and device activity data)	You; Affiliated entities; Service providers; Sales partners; Advertising or marketing partners	Provide services; Business operations; Marketing and advertising; Improve services; With your consent	Affiliated entities; Service providers; Advertising partners; Connected third-party services; Entities for legal purposes; Entities for business transactions	Advertising partners; Analytics providers

For more information about each category, purpose of use, and the third parties to whom we disclose information, please see Section 1 (Collection and Processing of Your Data, Section 2 (Why We Process Your Data), and Section 5 (To Whom We Disclose Your Data) above in this Privacy Policy.

Additional Rights

California residents (i.e., a natural person who is either present in California for other than a temporary or transitory purpose or is domiciled in California and is outside the state for a temporary or transitory purpose). have certain additional rights regarding their personal information. Subject to certain exceptions, if you are a California resident, you may request:

- access to your personal information including the right to know the categories of personal information we have or will collect about you and the reason we will or have collected such information;

- correction of the personal information that we have or will hold about you that is inaccurate; or
- deletion or removal of your personal information.

You also have the right not to be discriminated against (as provided for in California law) for exercising your rights.

Exceptions to Your Rights: There are certain exceptions to these rights. For instance, we may retain your personal information if it is reasonably necessary for us or our service providers to provide a service that you have requested or to comply with law or to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity or prosecute those responsible for that activity.

Exercising Your Rights: To exercise one of the rights above, you may contact us at dataprivacyNA@hydro.com.

We will take reasonable steps to verify your identity before responding to a request. In doing so, we may ask you for verification information so that we can match at least two verification points with information we maintain in our files about you. If we are unable to verify you through this method, we shall have the right, but not the obligation, to request additional information from you.

You may be able to designate an authorized agent to make requests on your behalf. In order for an authorized agent to be verified, you must provide Hydro the authorized agent with signed, written permission to make such requests or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent's request as permitted by applicable law.

“Sales” and “Sharing” of Personal Information: The CCPA provides a right to opt-out of “sales” of personal information to third parties or the “sharing” of personal information with third parties for “cross-context behavioral advertising” as those terms are defined under the CCPA. To opt-out from the “selling” and “sharing” of your personal information, as those terms are defined by the CCPA, please click the “Your Privacy Choices” at the bottom of the Hydro North American webpage.

We also respond to and abide by Global Privacy Control (GPC) signals on this domain as a form of opt-out preference signal.

Please note that any opt-out preferences you exercise through these methods will only apply to the specific device or browser on which you made them, and not linked to your personal identity or account information if the connection between your browser and account is not known to us.

If you use different devices or browsers, you may need to replicate your choices across those devices and browsers.

Sensitive Personal Information: The CCPA also allows you to limit the use or disclosure of your “sensitive personal information” if your sensitive personal information is used for certain purposes. Please note that we do not use or disclose sensitive personal information (e.g., precise geolocation; contents of mail, email, and text messages; genetic data; biometric information processed to identify a consumer) other than for purposes for which you cannot opt-out under the CCPA.

Shine the Light: California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits customers who are California residents to request and obtain from us once a year, free of charge, information about certain personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. We do not disclose your personal information to unaffiliated third parties for their own marketing purposes. If you are a California resident and would like more information, please email dataprivacyNA@hydro.com with the subject line “California Privacy Rights.”

12. Contact Us

Depending on your jurisdiction of residence and your relationship with us, you may have certain legal rights to access, correct, or delete your data; to withdraw your consent to the processing of your data under certain circumstances; or to opt-out of the processing of personal data for profiling in furtherance of decisions that produce legal or similarly significant effects.

If you wish to exercise one of these rights, please email us at dataprivacyNA@hydro.com with the subject line “Data Subject Rights.” You may also use this email address to contact us with questions or complaints about Hydro North America’s data practices.

Note that we may deny requests where permitted by applicable law. If we deny your request in whole or in part, you may have the right to appeal the decision. In such circumstances, we will provide you with information regarding the appeals process.

13. Changes to this Privacy Policy

We keep our Privacy Policy under periodic review. New versions will be posted on the website from time to time.