

RESPECTING PERSONAL DATA

Materion is committed to respecting and protecting your personal data. We comply with all applicable data protection laws. We have implemented a Personal Data Protection Team who oversee compliance with our personal data compliance program. Our website Privacy Statement, together with our [Terms Of Use](#) and any documents referred to in it, explains the basis on which any personal data we collect from you, or that you provide to us, will be processed, the control you have over your personal data and the procedures we have in place to protect it. It applies to any personal data which is collected and/or provided through our websites.

MAKING SURE INFORMATION SYSTEM INFRASTRUCTURES ARE SECURE



Materion maintains a rigorous cybersecurity infrastructure to protect our company, customer and personal data within Materion's information systems. Our Information Systems (IS) policies and procedures are modeled against the ISO 27001 standard and NIST SP800-171. We are currently in the process of preparing for a Level 2 Cybersecurity Maturity Model Certification (CMMC). In the last two years, we engaged an external third party to audit our information security standards against CMMC requirements.

Our systems are protected by state-of-the-art products and we have a dedicated Cybersecurity Team overseeing the environment. We regularly perform testing to ensure that our controls are in place and effective. We utilize independent third-party services, to verify our security posture. We continuously maintain an advanced security scorecard rating, and we are ranked at the top amongst our peer group. We maintain system security and incident response plans to ensure we are up to date on current protocols and frameworks. Materion has an extensive backup and disaster recovery plan that is tested regularly.

PROTECTING COMPANY INFORMATION

The protection of Materion's company information and assets is the responsibility of all directors, officers, employees and business partners with authorized access to our confidential information and assets. Materion has established a Global Cybersecurity Team. The Global Cybersecurity Team's focus is to mitigate cyber risks by establishing and adhering to industry security standards across the business and apply stronger measures when necessary. As a result, Materion has not experienced a known information breach, financial penalties, or settlements associated with an information security breach within the last three years.

To support the Global Cybersecurity Team's initiatives, Materion has developed an Information Security training program to reinforce the importance of protecting company information and assets. The training program consists of monthly simulated email phishing exercises and quarterly online compliance training courses. In addition, the Audit and Risk Committee of Materion's Board of Directors receive quarterly reports from the Chief Information Officer on the Company's information technology and cyber risk profile, enterprise cyber program, and key enterprise cyber initiatives and significant updates on external audits of our information security program. At least annually, the full Board attends a cybersecurity training from external experts and review and discusses the Company's technology strategy with the Chief Information Officer and approves the Company's technology strategic plan.

The responsibility and obligation to protect company information and assets is also reinforced within our Company Code of Conduct and Supplier Code of Conduct.

MATERION PRIVACY STATEMENT

Materion Corporation ("Materion," "we" or "us") is committed to respecting and protecting your privacy. This Website Privacy Statement ("Statement"), together with our [Terms Of Use](#) and any documents referred to in it, explains the basis on which any personal data we collect from you, or that you provide to us, will be processed, the control you have over your personal data and the procedures we have in place to protect it. It applies to any personal data which is collected and/or provided through our websites (the "Websites").

PLEASE READ THE FOLLOWING CAREFULLY TO UNDERSTAND OUR VIEWS AND PRACTICES REGARDING YOUR PERSONAL DATA AND HOW WE WILL TREAT IT.

We take responsibility for the personal data we collect about you, and we aim to be transparent about how we handle it, and give you control over it. If you are visiting our Websites from the

European Union (“EU”) or where applicable EU data protection laws so provide, please see the section entitled “Rights Under EU Data Protection Laws” for additional information.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

- **Information you give us:**

This is the information that you give us by filling in forms on our Websites or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our Websites; subscribe to our services, email alerts, or newsletters; search for or purchase products; post comments or interact with other social media functions on our Websites; enter a competition, promotion or survey; and when you report a problem with our Websites. The information you give us may include but is not limited to your name, address, email address, phone number, the nature of the product or service you are interested in, a personal description, employment related information (such as job title), photographs, and any other information you choose to provide to us;

- **Information we collect about you:**

When you visit our Websites, we will automatically collect the following information:

- Technical information, including the internet protocol (IP) address used to connect your computer or other device to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device model, screen size, HTML5 audio and video capabilities. We may also collect your location, including country, region and city derived from your IP address;
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information, (such as scrolling, clicks and mouse-overs), methods used to browse away from the page and any phone number used to call to contact us.
- We also automatically collect information about you from cookies and other similar technologies, which may be considered Personal Data under applicable laws, to distinguish you from other users of our Websites, to improve your experience on our Websites, to improve our Websites, and for other functions. For detailed information on the cookies we use and the purposes for which we use them, see our [Cookie policy](#).

- **Information we receive from other sources:**

We may receive information about you from other sources, such as other Materion entities and Websites, other Website users, and our business partners and service providers (such as web analytics providers).

We may combine information you or others give to us with information we automatically collect about you, and process the merged information for the purposes set out below.

HOW WE PROCESS YOUR PERSONAL DATA AND ON WHICH LEGAL GROUNDS

The legal basis for our processing of your personal data is our legitimate interest as described below or as necessary for the performance of a contract with you.

We process your information as follows:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with information, products and services that you request from us, including but not limited to newsletters that you have subscribed to;
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about as well as other goods, services, or promotional services that we believe may interest you. If you are located in the European Union (EU) or California, we will only send unsolicited information and marketing about our goods or services to you by electronic means (email or SMS) to the extent permitted by applicable data protection and direct marketing laws, including where required, subject to your consent. If you do not want us to use your data in this way, please tick the relevant box situated on the form on which we collect your data, opt out using the link provided in the relevant communication, or contact us using the details provided at the end of this Statement;
- To serve advertisements on other websites in addition to on our own Websites (generally in partnership with third parties). Both we and our network advertisers may deliver advertisements to you for products and services which you might be interested in, based on your visits to our Websites and to other websites, subject to your consent, where required by applicable laws. However, we will not share or sell information that identifies you specifically with a third party for the third party's own direct marketing purposes;
- To send you administrative notices to inform you about important changes in our contractual relationship or changes to our services;
- To resolve disputes and to enforce our agreements with you, including our Website Terms of Use;

- To ensure that content from our site is presented in the most effective manner for you and for your computer; and
- To administer our sites and for other internal operations, including troubleshooting, data analysis and statistics, testing, research, survey purposes, and to keep our site safe and secure; to allow you to participate in the interactive features of the site if you choose to do so; for us to deal with any problems with the Websites which you have reported; and to measure or understand the effectiveness of advertising we serve to you and others.
- For other purposes if we seek your consent at the time.

We will not process your personal data for automated-decision making which has legal or similarly significant effects, except that we may process your personal data to create personalized profiles about you in order to deliver personalized marketing content on our Website or in our communications with you.

CHOICE

In most cases, you are not obliged to provide any Personal Data to us, but you may not be able to use the Website in such case at all or to the fullest extent that the Website provides for. For example, we will not be able to provide you with the information or service which you have requested without certain information, such as your contact details.

If the legal basis for processing your Personal Data is consent (in which case we would ask you separately to provide your consent to a particular processing activity at the time), you may revoke your consent by contacting us using the information below.

If you do not wish to receive information regarding our products, services, special offers and upcoming events, please click on the “Unsubscribe” link shown on our emails and electronic newsletters to you or contact us at the email address listed at the end of this Statement.

STORAGE

We will only keep your Personal Data for as long as we need to in order to fulfill the relevant purpose(s) it was collected for, as set out above in this Statement; for as long as is necessary for the performance of the contract between you and us, if any; and for as long as we are required to keep it by law or for the duration of the limitation period of any potential claim that the Personal Data may relate to.

DISCLOSURE OF YOUR INFORMATION

You acknowledge that we have the right to share your personal data with the following recipients to the extent permitted by applicable data protection law:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries;
- Selected third parties, including:
 - Business partners, suppliers and sub-contractors to operate the Website or to provide the products or services you request (such as service providers that assist with IT support, hosting and maintenance services, professional advisors (such as consulting firms and legal counsel), and analytics and search engine providers that assist us in the improvement and optimization of our Website);
 - Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a certain location). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
 - As part of a merger, acquisition, transfer, sale, purchase, corporate change, bankruptcy, or any other transaction involving all or a portion of Materion's (or one of its subsidiaries' or affiliates') assets, Materion may transfer your information to the purchaser or seller in connection with that transaction;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [site usage terms](#), or other agreements; or to protect the rights, property or safety of Materion, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We do not share or sell your personal data with third parties for the third parties' own direct marketing purposes.

INTERNATIONAL DATA TRANSFERS

By using the Site or providing Personal Data to Materion, your Personal Data is transferred to the United States where Materion is headquartered. The basis for the transfer of your Personal Data to the United States is EU Standard Contractual Clauses that Materion has executed. If you are not a resident of the United States, your country's laws governing data collection and use may differ from those in the United States. For example, the data protection laws of the

United States have not been found by the European Commission to provide the same level of protection as EU data protection law. Some of the third parties with whom we share your Personal Data are also located in third countries that do not provide the same level of protection to your Personal Data. Certain third countries have been officially recognized by the European Commission as providing an adequate level of protection ([list available here](#)). Transfers to third parties located in other third countries outside the European Economic Area (“EEA”) take place using an acceptable data transfer mechanism, such as the EU-U.S. Privacy Shield for transfers to self-certified U.S. organizations, the EU Standard Contractual Clauses, Binding Corporate Rules, approved Codes of Conduct and Certifications or in exceptional circumstances on the basis of permissible statutory derogations. Please contact DataPrivacy@materion.com, if you want to receive further information or, where available, a copy of the relevant data transfer mechanism.

SECURITY

We maintain appropriate administrative, technical and physical safeguards to protect your personal data against loss, misuse, unauthorized access, disclosure, alteration or destruction.

RIGHTS UNDER EU DATA PROTECTION LAWS

Materion is the data controller of your personal data. Where EU data protection laws apply, subject to certain exceptions, you will have the following rights, which can be exercised by contacting us at DataPrivacy@materion.com:

- To ask us not to process your personal data for marketing purposes.
- To access personal information held about you and to obtain a copy of it;
- To obtain without undue delay the rectification or completion of personal data which are inaccurate or incomplete ;
- To restrict or object to the processing of your personal data and to request its erasure under certain circumstances;
- To receive your personal data, which you have provided to Materion, in a structured, commonly-used and machine readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible;
- To be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and
- To lodge a complaint about the way in which your personal data is being used to a supervisory authority.

- Where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time by [contacting us](#) using the information at the end of this Statement.

THIRD PARTY LINKS

This Statement only applies to the processing activities of Materion through the Websites. Our Websites may, from time to time, contain links to and from the websites of our partner networks, advertisers affiliates, and other third parties. If you follow a link to any of these websites (including the “careers” website that is linked on our Website, which is hosted by a third party), please note that those websites have their own privacy statements and that we do not accept any responsibility or liability for those practices. Please check the privacy statements posted by those other third parties before visiting third party website or submitting any personal data to those websites.

CALIFORNIA CONSUMER PROTECTION ACT (CCPA)

This section applies to California Residents.

The Personal Data we collect might, depending on the situation, include identifiers, characteristics of protected classifications under California Federal Law, commercial information, internet or other network activity information, or inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer’s preferences, characteristics, behavior, attitudes, intelligence, abilities and aptitudes. For detailed information on what we collect please review the ‘Information We Collect From You’ section of this Statement.

As described in this Statement, Personal Data we collect from consumers might be shared for business or commercial purposes with third parties. You can find more details on this third-party sharing in the ‘Disclosure Of Your Information’ section.

We might have disclosed all of the categories of Personal Data listed above, based on the use case, for a business purpose in the past 12 months.

The CCPA provides consumers (California residents) with specific rights regarding their Personal Data. This section describes your CCPA rights and explains how to exercise those rights. Those rights are:

- The right to know
- The right to delete

- The right to opt-out

In accordance with applicable law, we will not discriminate against you for exercising these rights. You can exercise your right, at any time by contacting us via email at DataPrivacy@materion.com, or via phone by calling [Phone: +1-877-826-9678](tel:+1-877-826-9678).

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Data or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Data. We cannot respond to your request or provide you with Personal Data if we cannot verify your identity, or authority to make the request, and confirm the Personal Data relates to you. We will only use Personal Data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We will respond to a Request to Opt-Out within 15 days. We will respond to Requests to Delete and Requests to Know within 45 days, unless we need more time, in which case, we will notify you and may take up to 90 days total to respond to your request.

California Do Not Track Disclosure: At this time, Materion's Websites do not respond to Do Not Track beacons sent by browser plugins as there is not yet a common agreement about how to interpret Do Not Track signals from browsers. However, you may delete or refuse cookies, though taking such action may limit your ability to use the Website fully.

CHILDREN'S PRIVACY

We do not use the Websites to knowingly collect personal data from children under the age of thirteen (13), nor is this Site designed for or directed at children. By using the Websites, you represent that you are age thirteen (13) or over. If you are a child under thirteen (13) years of age, you are not permitted to use the Websites and should not send any personal data about yourself to us through the Websites. If you believe that a child may have provided his or her personal data to us, please contact us using the contact information at the end of this Statement. In the event that we become aware that we have collected personal data from a child under the age of thirteen (13), we will dispose of that personal data immediately.

CHANGES TO THIS PRIVACY STATEMENT

Any changes we make to our Statement in the future will be posted on this page and, where appropriate, notified to you by email. Please check frequently to see any updates or changes to our privacy policy.

CONTACT US

If you have any questions, comments or concerns about any aspect of this policy or how Materion handles your information please email our Privacy Team at DataPrivacy@materion.com.

Our representative in the EU is:

Materion Brush GmbH
Motorstrasse 34, D-70499
Stuttgart, Deutschland