

PRIVACY NOTICE

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint. This Privacy Notice applies to Accuride Corporation and its affiliates (collectively, “Accuride”).

If you are a California resident, please also see the section of our Privacy Notice entitled “Your Rights Under the CCPA.” Accuride does not actively market or offer goods or services to individuals in the European Economic Area (“EEA”) or United Kingdom (“UK”). References to EU or UK law are provided for informational purposes only. Please see the section of our Privacy Notice entitled “EEA/United Kingdom Law.” If applicable under EU or UK law, certain Accuride entities may act as “controllers” of personal information.

1. Key Terms. It would be helpful to start by explaining some key terms used in this policy:

We, us, our, or Accuride	Accuride Corporation and our affiliates, including Accuride Distributing, LLC, Accuride Henderson, LLC, AOT, LLC, and Accuride Erie, LP
Personal information	Any information relating to an identified or identifiable individual

2. Personal Information We Collect About You. We may collect and use the following personal information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

2.1 Use of Our Website

If you use our website (www.accuridecorp.com, “our website”), we process your personal information as follows:

a. Calling up our website / access data

Each time you use our website, we collect the access data that your browser automatically transmits to enable you to visit the website. The access data includes in particular:

- IP address of the requesting device,
- Date and time of the request,
- Address of the accessed website and the requesting website,

- Information about the browser and operating system used,
- Online identifiers (e.g. device identifiers, session IDs).

The data processing of this access data is absolutely necessary to enable the visit of the website, to ensure the permanent operability and security of our systems as well as for the general administrative maintenance of our website. The access data is also temporarily stored in internal log files for the purposes described above, for example in order to find the cause of repeated or criminal calls that endanger the stability and security of our website and to take action against them.

b. Making Contact

You have various options for contacting us. These include our contact form. In this context, we process data exclusively for the purpose of communicating with you. The data we collect when you contact us will be automatically deleted after we have fully processed your request, unless we still need your request to fulfil contractual or legal obligations.

c. Use of Cookies and Similar Technologies

This website uses cookies and similar technologies (collectively, “Tools”) provided either by us or by third parties. A cookie is a small text file that is stored on your device by the browser. Cookies are not used to run programs or download viruses onto your computer. Comparable technologies are in particular web storage (local / session storage), fingerprints, tags or pixels. Most browsers are set by default to accept cookies and similar technologies. However, you can usually adjust your browser settings so that cookies or similar technologies are rejected or only stored with your prior consent. If you refuse cookies or similar technologies, not all of our offers may function properly for you.

In the following, we list the tools we use by category, informing you in particular about the providers of the tools, the storage period of the cookies and the transfer of data to third parties. In addition, we explain in which cases we obtain your voluntary consent to use the tools and how you can revoke this consent.

In the event of any discrepancy between the cookie banner and this Privacy Notice, the terms of this Notice shall govern, except where consent is required by applicable law.

i. Obtaining of Your Consent

We use [Drupal](#) to obtain and manage your consent. Drupal generates a banner informing you about data processing on our website and giving you the option to consent to all, some or no data processing through optional tools. This banner will appear the first time you visit our website and when you revisit to change your choices or withdraw consent.

The banner will also appear on subsequent visits to our website if you have deactivated the storage of cookies or if the cookies or information in our local storage have been deleted or have expired.

ii. Withdrawal of Your Consent:

You can revoke your consent for certain tools at any time. To do so, click on “Privacy Settings” tab on the homepage. There you can also change the selection of the tools you wish to consent to using, as well as obtain additional information on the cookies and the respective storage period. Alternatively, you can assert your revocation for certain tools directly with the respective provider

iii. Necessary tools

We use certain tools to enable the basic functions of our website (“necessary tools”). Without these tools, we could not provide our service. Therefore, necessary tools are used without consent based on our legitimate interests.

- **Our Own Cookies**

We use our own necessary cookies in particular

- to save your language settings,
- to indicate that information placed on our website has been displayed to you - so that it will not be displayed again the next time you visit the website.

- **Google Tag Manager**

The Google Tag Manager is used exclusively to manage website tools by integrating so-called website tags. A tag is an element that is stored in the source code of our website in order to execute a tool, for example through scripts. If these are optional tools, they will only be integrated by the Google Tag Manager with your consent.

Google Tag Manager sets the following cookies for technical debugging purposes: “_ga”, “_gid”, and “_gat”.

For the purpose of ensuring stability and functionality, Google collects information on which tags are integrated by our website within the framework of the use of the Google Tag Manager, but in principle no personal data, in particular no data on user behavior, the IP address or the pages visited.

We have concluded an order processing agreement with Google. In the event that personal data is transferred to the USA or other third countries, we have concluded standard contractual clauses with Google pursuant to Art. 46 (2) lit. c GDPR. For further information, please refer to section 10. (“Transferring Your Personal Information Out of the Country of Origin”).

For more information, see [Google's information on TagManager](#).

iv. **Analysis tools**

In order to improve our website, we use tools for the statistical collection and analysis of general usage behavior based on access data (“analysis tools”). We also use analytics services to evaluate the use of our various marketing channels.

- **Google Analytics**

Our website uses Google Analytics, which uses cookies and similar technologies to analyze and improve our website based on your user behavior. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. The data accruing in this context may be transferred by Google to a server in the USA for evaluation and stored there. Please refer to section 10. (“Transferring Your Personal Information Out of the Country of Origin”) for the associated risks.

We have made the following privacy settings for Google Analytics:

- IP anonymization (shortening of the IP address before evaluation, so that no conclusions can be drawn about your identity)
- Automatic deletion of old logs / limitation of storage time
- Disabled Remarketing
- Disabled User-ID Policy

The following data is processed by Google Analytics:

- Anonymized IP address;
- Referrer URL (previously visited page);
- Pages viewed (date, time, URL, title, length of stay);
- Downloaded files;
- Clicked links to other websites;
- If applicable, achievement of certain goals (conversions);
- Technical Information: Operating system; browser type, version and language; device type, brand, model and resolution;
- Approximate location (country and city, if applicable, based on anonymized IP address).

Google Analytics sets the following cookies for the specified purpose with the respective storage period:

- “_ga” for 2 years and “_gid” for 24 hours (both used to recognize and distinguish website visitors by user ID);
- “_gat” for 1 minute (to reduce requests to Google servers);

We have concluded an order processing agreement with Google for the use of Google Analytics as well as standard contractual clauses in the event that personal data is transferred to the USA or other third countries. Please refer to section 10. (“Transferring Your Personal Information Out of the Country of Origin”) for the associated risks.

You can find more information about this in Google’s [privacy policy](#).

2.2 Processing Data of Our Business Partners

If you work with one of our business partners and act as our contact person, we may process the following of your personal information:

- your master data (first and surname, title, alias, title, employer, postal business address, business email address and phone number);
- your signature and signing dates on business documents (esp. on contracts);
- Vehicle ID (VIN)
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)

The purpose of the processing of this data is the initiation and fulfillment of contracts between us and your enterprise as our customer as well as the performance of obligations and assertion of rights under such contracts. Also, we may process your abovementioned personal data for operational reasons, such as improving efficiency, training and quality control in our business operations, to administrate warranty and deliver important product information. In some cases, we may also process your personal information in anonymized form in order to perform statistical analysis to help us manage our business, e.g. in relation to customer base, product range or other efficiency measures.

You are not legally or contractually obligated to provide your personal information as set out above. However, if you choose not to provide your personal information for processing as described above, this may impede our ability to conclude and fulfill contracts with your enterprise as our customer or to perform any obligations we may have thereunder.

2.3 Processing Data of Job Applicants

You can apply with us for open job positions via a number of different channels, such as, for example, our applicant management system (<https://www accuridecorp.com/career-opportunities>).

The purpose of collection of your personal information in this respect is the selection of applicants for the possible establishment of an employment relationship and the aptitude of the particular job applicant for the respective job.

For the receipt and processing of your application, we collect such personal information on you as stated and requested in the respective job offering or as provided by you. Such personal information may include, without limitation, the following data in particular: First name and surname, date of birth, application portraits, contacting information (such as postal address, e-mail address, telephone number), application documents (e.g. certificates, resume, CV, further professional and employment related information as well as, all as stated, Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)), date of earliest possible employment and salary expectations.

You are not legally or contractually obligated to provide your personal information as set out above. However, if you choose not to provide your personal information for processing as described above, we may not be able to consider your application for a particular job offer you may be interested in.

3. How Your Personal Information is Collected.

We collect most of this personal information directly from you—in person, by telephone, text or email or via our website and business applications. However, we may also collect information:

- Directly from a third party (e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers);
- From a third party with your consent (e.g., your bank, trade shows);
- From cookies on our website.

4. Why We Use Your Personal Information. Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. Section 2 above explains what we use (process) your personal information for and our reasons for doing so.

The above table does not apply to special category personal information, which we will only process if and to the extent permitted by applicable data protection law and – where required – on the basis of your prior and express consent.

- 5. Promotional Communications.** We may use your personal information to send you updates (by email, text message, telephone or post) about our products or services, including exclusive offers, promotions or new products or services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is required by applicable law, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organizations outside Accuride for marketing purposes.

You have the right to opt out of or, as applicable, withdraw your consent to receiving promotional communications at any time by:

- Contacting us at <https://www accuridecorp.com/contact>; or
- Using the “unsubscribe” link in emails.

Any withdrawal of your consent shall not affect the lawfulness of processing of your data based on such consent before its withdrawal.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

6. Who We Share Your Personal Information With.

We only disclose or transfer your personal information if and to the extent this is permissible under applicable law. Subject to the foregoing, we routinely share personal information with such of our partners, suppliers and service providers that are mentioned in this privacy policy as well as with the following recipients:

- Our affiliates;
- Service providers we use to help deliver our products or services to you, such as payment service providers, warehouses and delivery companies;
- Other third parties we use to help us run our business, such as marketing agencies or website hosts or website analytics providers, including platform.sh for the hosting of our website as well as the other service providers that are mentioned in this privacy policy;
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers;
- Hosted application providers such as Plex Systems to maintain appropriate details for business transactions; and
- Our professional advisors (e.g. auditors, accountants, law firms, and other consultants).

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal

information to provide services to us and to you. We may also share personal information with external auditors.

To the extent permissible under applicable data privacy law, we may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring, provided that such disclosure of personal data is allowed by applicable data privacy law. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

- 7. Notice of Personal Information We Sold or Disclosed for a Business Purpose as Required by the CCPA.** For purposes of the CCPA, please be advised that we have not sold to a third party any personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

In the preceding 12 months, we have disclosed for a business purpose to one or more third parties the following categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

- Identifiers (e.g., 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);
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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;
- Characteristics of protected classifications under California or federal law;
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement);
- Geolocation data;
- Professional or employment-related information;
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA); and

- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Business purposes for which we have disclosed such information include:

- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, provided that the personal information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer’s experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.

8. Where Your Personal Information is Held. Information may be held at our offices, third party agencies, service providers, representatives and agents as described above (see above: “Who We Share Your Personal Information with”).

9. How Long Your Personal Information Will Be Kept. We will keep your personal information while we are providing products or services to you. Thereafter, we will keep your personal information for as long as is legally allowed and necessary to pursue the respective purposes for which your data has been processed, in particular (without limitation) and in accordance with our data retention policy:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

10. Transferring Your Personal Information Out of the Country of Origin. To deliver services to you, it is sometimes necessary for us to share your personal information outside the country of origin:

- With offices of Accuride affiliates outside the country of origin;
- With your and our service providers located outside the country of origin;
- If you are based outside the country of origin; or
- Where there is an international dimension to the services we are providing to you.

We will ensure such transfers comply with data protection law and all personal information will be secure.

11. Your Rights Under the CCPA.¹ You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know:</p> <ul style="list-style-type: none"> • The categories of personal information we have collected about you; • The categories of sources from which the personal information is collected; • Our business or commercial purpose for collecting or selling personal information; • The categories of third parties with whom we share personal information, if any; and • The specific pieces of personal information we have collected about you. • Please note that we are not required to: • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary
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¹ Accuride endeavors to comply with applicable U.S. state privacy laws, including the Virginia Consumer Data Protection Act (VCDPA), Colorado Privacy Act (CPA), Connecticut Data Privacy Act (CTDPA), and Utah Consumer Privacy Act (UCPA). Our practices are aligned with the California Consumer Privacy Act (CCPA), which currently provides the most comprehensive consumer privacy protections in the United States.

	<p>course of business, that information about you is not retained;</p> <ul style="list-style-type: none"> • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or • Provide the personal information to you more than twice in a 12-month period.
<p>Personal Information Sold or Used for a Business Purpose</p>	<p>In connection with any personal information we may sell or disclose to a third party for a business purpose, you have the right to know:</p> <p>The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and</p> <p>The categories of personal information that we disclosed about you for a business purpose.</p> <p>You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale of your personal information. We do not sell your personal information.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records; and • Direct any service providers to delete your personal information from their records. • Please note that we may not delete your personal information if it is necessary to: <ul style="list-style-type: none"> ○ Complete the transaction for which the personal information

	<p>was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;</p> <ul style="list-style-type: none"> ○ Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; ○ Debug to identify and repair errors that impair existing intended functionality; ○ Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; ○ Comply with the California Electronic Communications Privacy Act; ○ Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent; ○ Enable solely internal uses that are reasonably aligned with
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	<p>your expectations based on your relationship with us;</p> <ul style="list-style-type: none"> ○ Comply with an existing legal obligation; or ○ Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
<p>Protection Against Discrimination</p>	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> ● Deny goods or services to you; ● Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; ● Provide a different level or quality of goods or services to you; or ● Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to our business by your personal information.</p>

12. EEA/United Kingdom Law. If you are a resident of the European Economic Area or United Kingdom, the following sections may apply:

- (a) If you want to access, correct, update or request deletion of your personal information, you may do so any time by contacting us at privacy@accuridecorp.com.
- (b) Additionally, you may object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us at privacy@accuridecorp.com.

- (c) You may also opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us at privacy@accuridecorp.com.
- (d) If we have collected and process your personal information with your consent, then you may withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- (e) Although we are not subject to the jurisdiction of the EU or UK, you may also complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

13. Mexican Data Privacy. Accuride’s operations in Mexico are subject to local labor and data protection laws. Personal information collected in Mexico is processed in accordance with applicable Mexican regulations.

14. Keeping Your Personal Information Secure. We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

15. How to Exercise Your Rights. Regardless of your location, if you would like to exercise any of your rights as described in this Privacy Policy, please:

- Complete a data subject request form available on our website at <https://www.accuridecorp.com/contact>
- Call us, toll-free, at 800-626-7096; or
- Email/write to us at the following:
 - Email:
 - privacy@accuridecorp.com
 - Postal Mail
 - Accuride Corporation – Attn: Legal Dept., 38777 Six Mile Road, Suite 410, Livonia, Michigan 48152

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly by any method (i.e. website/email/phone/in writing), you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

16. Changes to This Privacy Notice. This privacy notice was published on March 22, 2022 and last updated on December 1, 2025.

We may change this privacy notice from time to time—when we do, we will inform you via our website.

17. How to Contact Us. Please contact us by postal mail, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are set forth in Section 15.

18. Do You Need Extra Help? If you would like this notice in another format (for example: audio, large print, braille) please contact us (see “How to contact us” above).