

## **Steelscape LLC Privacy Policy**

Last Modified: August 18, 2022

This Privacy Policy explains how and why Steelscape LLC and our subsidiaries and affiliated companies (collectively, "Steelscape," "we" or "us") collect, use, and disclose information about you. This Privacy Policy applies to information we collect when you access or use our websites, mobile applications, and other online products and services that link to this Privacy Policy (collectively, our "Services"), or when you otherwise interact with us, such as through our customer support channels or on social media pages. We may provide different or additional notices of our privacy practices with respect to certain products or services, in which case this Privacy Policy will not apply.

We reserve the right to change, modify, add, or remove portions of this Privacy Policy from time to time. We will provide notice of any material changes through the Service or by other means, such as by adding a statement to the Services or sending you a notification. Please check back regularly for any changes we may make to the Privacy Policy. Your continued use of the Service following the posting of changes to this Privacy Policy means you accept these changes.

Please read this Privacy Policy carefully to understand our practices regarding your Personal Information. In addition, please review the Terms of Use that apply to your use of the Service. By using our Service, you consent to our Privacy Policy and agree to our Terms of Use. If you do not consent to this Privacy Policy and our practices discussed herein, your choice is to not use our Service.

### **1. Personal Information We Collect**

We collect information when you interact with the Service, for example when you create an account, fill out a form, make a purchase, participate in a contest or promotion, request customer support, or otherwise communicate with us. We refer to information that can identify you as "personal information." The types of information we may collect information—some of which may identify you—includes:

- First and last name;
- Company name;
- Occupation;
- Username and password;
- Answers to security questions;
- Email address;

- Phone number;
- Fax number;
- Physical address;
- Postal address;
- IP address;
- Unique device ID or other online identifier;
- Payment information, such as credit card payment data;
- Online payment enrollment token numbers;
- Education, job history, and other employment-related information; and
- Personal information you choose to provide in “comment, ” “question,” and other narrative forms.

Additionally, if you make a purchase, we work with a third-party payment processor to collect and process your payment information.

We may also collect general information about your interactions with us or our Services, including the equipment you use to access the Service, your operating system and browser type, the services that you use, times and dates of your interactions with the Service, details of your transactions through and interactions with the Service, and software event data.

Finally, our web forms allow you to provide the personal information of third parties (e.g., people on whose behalf you are requesting information – such as samples or product literature). By providing any third-party’s personal information, you are representing to us that you have the permission to provide that personal information and that we may use it as set forth in this Privacy Policy.

## **2. How We Collect Information**

We may collect information:

- Directly from you when you provide it, including by filling out forms requesting additional information or further services, applying for a job, setting up an account and personal profile, registering for online payments, or participating in promotions.
- Automatically as you interact with the Service, such as approximate location, data on browsing activities and patterns, times and dates of logins, and event data. We also collect information about your activity on our Services, such as access times, pages viewed, links clicked, and the page you visited before navigating to our Services.

- From third parties, including analytics providers, that we use to operate the Services.
- From social media platforms linked from the Service, such as Facebook, LinkedIn, Twitter, Pinterest, Instagram, and YouTube, if you “Like,” “Follow,” or you choose to complete a lead generation form or otherwise interact with our page or profile on that platform.

We (and those who perform work for us) use tracking technologies to collect information about your interactions with the Services, including cookies and web beacons, which are described briefly below:

**Cookies (or browser cookies).** The Service uses “cookies”, which are small files that we save on your computer or mobile device. Our cookies help to give you faster access to pages you have already visited and help you participate in activities or events on the Service. They may also help us customize our offerings to you. You may choose to disable some cookies through your web browser, but doing so may affect your ability to access or use the Service.

**Flash Cookies.** Certain features of our Service may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Service. Flash cookies are not managed by the same browser settings as are used for browser cookies. You may set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s website: [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html). If you disable or refuse cookies, please note that some parts of the Service may then be inaccessible or not function properly.

**Web Beacons.** Web beacons are small graphic images or other programming code (also known as “1×1 GIFS,” “pixel tags,” or “clear GIFs”) that we use on our Services and in our emails to help deliver cookies, count visits, and understand usage and campaign effectiveness. We may include web beacons in the Service and in email messages. Web beacons may be used to count visitors to the Service, to monitor how users navigate our Services, and to count how many emails that we send are actually opened.

### 3. How We Use Your Personal Information

We may use or disclose your information for one or more of the following business purposes:

- Presenting our Service and its contents to you.
- Personalize your experience with us.

- Providing the information, goods, and services you've requested or agreed to receive.
- Enabling you to interact with Service features and improving the Service's performance when you return to the Service.
- Enabling you to participate in promotions through the Service.
- Processing your account and online payment registration, including determining your eligibility for an account and online payment registration.
- Processing your online payment.
- Carrying out our obligations and enforcing our rights arising from any contracts entered into between you and us, including for billing and collection.
- Improving and managing the Service including to debug and repair errors in our Services.
- Informing you about new features of the Service, sending you technical notices, security alerts, support messages and other transactional or relationship messages.
- Marketing our products and services to you and sending you marketing materials that may be of interest to you.
- Monitoring and analyzing trends, usage, and activities in connection with our products and services.
- Detect, investigate, and help prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity and help protect our rights and property and of others.
- For any other purpose disclosed by us when you provide the information.

#### 4. **How We Share Information**

We may share non-personally identifiable information, such as aggregated and deidentified user statistics, with third parties without restriction. We do not share your personal information with third parties for third-party marketing purposes, or for any other purpose other than as described in this Privacy Policy. We may share the information we have collected about you, including personal information, as disclosed at the time you provide your information and in the following circumstances:

**Third Parties Providing Services on Our Behalf.** We use third parties to host the Service, design and operate the Service features, and perform administrative, analytics, payment processing, advertising, and communications services. Services these parties provide include processing your payments made through the Service, enabling us to send you email newsletters and marketing materials, and providing

information to us about the use of the Service and viewing of our content. We may disclose your personal information to these companies so they can carry out these business purposes on our behalf. We may use:

(a) third-party analytics service providers and (b) ad-serving platforms which may set and access their own cookies and web beacons on your device. These parties may have access to usage information.

Currently, we use the following two Google LLC services:

### **Google Analytics**

- Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

### **Google Ad**

- Google Ads is an ad-serving service offered by Google that uses technologies—such as cookies—to display ads (including our ads) based on your visits to the Service. So you may see our ads displayed on other websites you visit, or in your Google search results. Like Google Analytics, Google may share information obtained through its AdWords service with other Google services.

You may opt-out of certain Google service features, such as through your device advertising settings, or by following the instructions provided by Google in its Privacy Policy: <https://policies.google.com/technologies/partner-sites>.

For more information on the privacy practices of Google more generally, visit the Google Privacy Terms web page: <http://www.google.com/policies/privacy/>.

**Promotions.** We may offer promotions through the Service that may require registration. By participating in a promotion, you agree to the terms, conditions and/or official rules that govern that promotion, including terms related to the disclosure of your personal information.

**Administrative and Legal Reasons.** We may also disclose personal information to enforce or apply our policies and agreements, including this Privacy Policy and our [Terms of Use](#), or if required to do so by law or in the good-faith belief that such action is necessary to (y) conform to applicable law or comply with legal process served on us; and (z) protect and defend our rights or property, the Service, its users, or the public.

**Affiliated Companies.** Personal information is shared between and among Steelscape and our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership.

**Business Transfer.** We reserve the right to disclose and transfer all information related to the Service, including, without limitation, your personal information and usage information: (i) to a subsequent owner, co-owner, or operator of the Service or applicable database; or (ii) in connection with a corporate merger, consolidation, reorganization, divestiture, restructuring, the sale of substantially all of our equity interests and/or assets, or other corporate change, including, without limitation, during the course of any due diligence process or during any bankruptcy, liquidation, or similar proceeding.

**With Your Consent.** We share personal information with your consent or at your direction.

**Third Party Products and Services.** At your request, we share personal information with third parties in order to fulfill your requests.

#### 5. **Sales of Personal Information.**

We have not sold, and—except in connection with a business transfer (described above)—we will not sell your personal information.

#### 6. **Links to Other Websites, Social Media Platforms, Mobile Applications, and Services**

We are not responsible for the practices employed by websites, social media platforms, mobile applications, or services linked to or from the Service, including the information or content contained therein. Please remember that our Privacy Policy does not apply to third-party websites, platforms, mobile applications, or services. Unless otherwise stated herein, this Privacy Policy does not apply to information we collect by other means (including offline) or from sources other than through the Service.

#### 7. **Security**

Your Personal information is stored in secure operating environments.

While we make reasonable efforts to safeguard your personal information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. As a result, we cannot ensure or warrant the security of any information you transmit to us or information we transmit to you from the Service, and you assume all related risks.

## 8. Other Information

**Cross-Border Transfer.** The Service is hosted on servers in the United States. Any personal information you provide to us will be processed and stored on servers in the United States, the laws of which may be deemed by other countries to have inadequate data protection. Accordingly, if you are located outside the United States, you consent to the processing and storage of such data in the United States.

**Do Not Track.** Some browsers incorporate a “Do Not Track” (DNT) feature that, when turned on, signals to websites and online services that you do not want to be tracked. At this time, the Service does not respond to DNT signals.

**Children Under 16.** The Service is not intended for children under 16, and we do not knowingly collect personal information from children under the age of 16. If you are under 16, please do not use the Service or submit any personal information through the Service.

If you are a parent or legal guardian of a child under the age of 16 and have reason to believe that your child has provided their personal information to us, please contact us and we will delete that information.

## 9. Your California Privacy Rights

The California Consumer Privacy Act or “CCPA” (Cal. Civ. Code § 1798.100 *et seq.*) and the Shine the Light law (Cal. Civ. Code § 1798.83) afford consumers residing in California certain rights with respect to their personal information. If you are a California resident, this section applies to you if you are a customer or have a direct relationship with us. This section of the Privacy Policy applies to information collected online and offline through or in connection with our Services.

### ***California Consumer Privacy Act***

In the preceding 12 months, we have collected the following categories of personal information set forth in the table below. For details about the precise data points we collect and the categories of sources of such collection, please see the “Personal Information We Collect” above. We collect personal information for the business and commercial purposes described in the “How We Use Your Personal Information” section above. In the preceding 12 months, we have disclosed the following categories of personal information for business purposes to the following categories of recipients:

<b>Category of Personal Information</b>	<b>Categories of Recipients</b>
<p><b>Identifiers</b> (e.g., name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name or other similar identifiers)</p>	<ul style="list-style-type: none"> <li>• Vendors and service providers such as payment processing, web hosting, information technology, customer service, cloud service, data analytics, social networks, marketing and advertising.</li> <li>• Law enforcement, government agencies, and for legal compliance, when necessary.</li> </ul>
<p><b>Commercial Information</b> (e.g., name, signature, address, telephone number)</p>	<ul style="list-style-type: none"> <li>• Vendors and service providers such as payment processing, web hosting, information technology, customer service, cloud service, data analytics, social networks, marketing and advertising.</li> <li>• Law enforcement, government agencies, and for legal compliance, when necessary.</li> </ul>
<p><b>Professional or Employment-Related Information</b> (e.g., Current or past job history)</p>	<ul style="list-style-type: none"> <li>• Vendors and service providers, such as information technology, and cloud service.</li> <li>• Law enforcement, government agencies, and for legal compliance, when necessary.</li> </ul>
<p>Personal information described in California Civil Code Section 1798.80(e)</p>	<ul style="list-style-type: none"> <li>• Vendors and processors, such as payment processing, information technology, cloud service, customer service, and data analytics.</li> <li>• Law enforcement, government agencies, and for legal compliance, when necessary.</li> </ul>
<p><b>Internet or Other Electronic Network Activity</b> (e.g., browsing history, search history, information on a consumer's interaction with the Service or advertisement)</p>	<ul style="list-style-type: none"> <li>• Vendors and service providers such as payment processing, web hosting, information technology, customer service, cloud service, data analytics, social networks, and marketing and advertising.</li> </ul>



	<ul style="list-style-type: none"> <li>• Law enforcement, government agencies, and for legal compliance, when necessary.</li> </ul>
<p><b>Geolocation Data</b> (e.g., physical location)</p>	<ul style="list-style-type: none"> <li>• Vendors and service providers such as payment processing, web hosting, information technology, cloud service, customer service, data analytics, social networks, marketing and advertising.</li> <li>• Law enforcement, government agencies, and for legal compliance, when necessary.</li> </ul>
<p><b>Inferences</b></p>	<ul style="list-style-type: none"> <li>• Vendors and service providers such as information technology, data analytics, marketing and advertising.</li> </ul>

We do not sell your personal information.

We do not knowingly sell personal information about consumers under the age of 16.

Subject to certain limitations, you have the right to (1) request to know more about the categories and specific pieces of personal information we collect, use, and disclose, (2) request deletion of your personal information, (3) opt out of any “sales” of your personal information that may be occurring, and (4) not be discriminated against for exercising these rights. You may make these requests by submitting a request by completing this webform, calling 1.888.285.7717 or emailing [privacy@bluescope.us](mailto:privacy@bluescope.us). We will verify your request by asking you to provide information related to your recent interactions with us, such as information from your online account, account number and email address.

We will not discriminate against you if you exercise your rights under the CCPA.

If we receive your request from an authorized agent and they do not provide a valid power of attorney, we may ask the authorized agent to provide proof that you gave the agent signed permission to submit the request to exercise rights on your behalf. In the absence of a valid power of attorney, we may also require you to verify your own identity directly with us or confirm to us that you otherwise provided the authorized agent permission to submit the request.

***Shine the Light***

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. If you are

a California resident and would like to make such a request, please call 1.888.285.7717 or email us at [privacy@bluescope.us](mailto:privacy@bluescope.us).

#### **10. Your Choices; Contact Information**

If you choose not to provide personal information, you may be unable to access or use the Service or certain Service features. For example, if you do not provide your name and company name you will be unable to create an online account. You may access and update the personal information you provided to set up your account at any time through your account.

If you no longer wish to receive promotional and marketing communications from us, send us an email at [privacy@bluescope.us](mailto:privacy@bluescope.us). You can also stop receiving certain types of email communications from us by clicking on the “unsubscribe” link provided in such communications.

If you would like to ask a question or request additional information regarding this Privacy Policy, you may submit a request to us via email at [privacy@bluescope.us](mailto:privacy@bluescope.us). Please note that we may ask you to verify your identity before responding to any request.