

## CALIFORNIA CONSUMER PRIVACY ACT NOTICE

This California Consumer Privacy Act Notice for California Consumers (“CCPA Privacy Notice”) supplements the Privacy Policy of Kloeckner Metals Corporation (“we,” “us,” and “our”) and applies solely to California consumers. The California Consumer Privacy Act (“CCPA”) affords California consumers certain rights over their Personal Information (subject to certain exceptions). This CCPA Privacy Notice outlines those rights and explains how such rights may be exercised. This CCPA Privacy Notice also summarizes our data collection and sharing practices, as required by the CCPA. Terms used but not defined shall have the meaning ascribed to them in the CCPA.

### **1. Information is Covered by this CCPA Privacy Notice**

This CCPA Privacy Notice relates to our collection, use and disclosure of California consumers’ personal information. “**Personal information**” generally means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. For a list of the categories of personal information that we collect, please see section 7 (Summary of Collection, Use, and Disclosure of Personal Information) below.

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

For a list of the categories of sources from which we may collect personal information, please see Section 7 (Summary of Collection, Use and Disclosure of Personal Information) below.

### **3. How We Use Personal Information**

We may use your personal information for a variety of business and commercial purposes. “**Business purpose**” generally refers to the use of personal information for our operational purpose. “**Commercial purpose**” refers to when we use personal information to advance our commercial or economic interests including, for example, by encouraging others to purchase our products and services. For a more fulsome explanation of how we may use each category of personal information, please see section 7 (Summary of Collection, Use and Disclosure of Personal Information) below.

### **4. With Whom We Share Personal Information**

We may share your personal information with the third parties described below. For a more detailed summary of the categories of third parties we may share your personal information with, please see Section 7 (Summary of Collection, Use and Disclosure of Personal Information) below.

- a) **Service Providers.** We may share your personal information with third parties who work on behalf of, or with, us such as vendors, processors, suppliers, agents, attorneys, management companies, and representatives (collectively, “Service Providers”). Service Providers assist us with a variety of functions including, but not limited to, determining your suitability for employment, checking your credit references, performing anti-fraud analyses, sending marketing communications, assisting with advertising and related analytics, providing management services, conducting research or surveys, sending regular mail and e-mail, maintaining databases, screening candidates, administering and managing contingent workforce programs for our customers, administering applicant tracking systems, human resource information management, payroll processing, and benefit administration, and information technology services such as data storage or hosting, business continuity, and disaster relief.
- b) **Affiliated Companies.** We may share personal information among and between Kloeckner Metals Corporation and its affiliates and subsidiaries.

- c) **Disclosures Under Special Circumstances.** We may disclose your personal information to third parties: (i) where we have a good faith belief that such disclosure is necessary to meet any applicable law, regulation, legal process or other legal obligation; (ii) when we believe disclosure is necessary to protect or prevent harm or financial loss; or (iii) to detect, investigate and help prevent security, fraud or technical issues. These recipients are collectively referred to as “Special Circumstances Recipients.”
- d) **Government Agencies.** We may share your personal information with government agencies, law enforcement, or authorized third parties in response to a request relating to a civil or criminal investigation or other alleged illegal activity. We may also share your personal information with state and federal tax authorities. These recipients are collectively referred to as “Government Agencies.”
- e) **Corporate Transactions.** We may transfer your personal information in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations. These recipients are collectively referred to as “Corporate Transaction Recipients.”

**5. We Do Not Sell Personal Information**

We do not sell personal information to third parties. We also do not share any personal information with third parties for the third-parties’ marketing purposes.

**6. We Do Not Knowingly Collect the Personal Information of Children**

We do not knowingly collect or store any personal information from anyone under the age of 16. If we become aware that we have collected or stored personal information from an individual under age 16, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to [DataPrivacy@kloeckner.com](mailto:DataPrivacy@kloeckner.com).

**7. Summary of Collection and Disclosure of Personal Information**

When you visit our website, use our mobile applications, communicate with us, or purchase or use our products or services, we collect personal information. The table below summarizes our collection and sharing practices relating to personal information, including with respect to personal information we have collected, used and disclosed in the preceding 12 months.

Category of Personal Information	Categories of Sources of Information	Business/Commercial Purposes for Collection	Categories of Third Parties with Whom Information Was Shared
<p><b>Identifiers</b></p> <p>Examples: real name; alias; postal address; telephone numbers; unique personal identifier; online identifier; Internet Protocol Address; email address; account name, social security number, driver’s license number, passport number and other similar identifiers.</p>	<p>Directly from potential and existing customers (online and offline)</p>	<ul style="list-style-type: none"> <li>• Verify your identity</li> <li>• Process payments for goods or services</li> <li>• Provide, support, personalize, and develop our websites,</li> </ul>	<p>Services Providers (including DMS Companies, Marketing Companies, Computer Software Companies, Professional</p>

		<p>products, and Services</p> <ul style="list-style-type: none"> <li>• Process and fulfill a request or other transaction submitted to us</li> <li>• To complete contracts as well as any disclosures or other documents required by law</li> <li>• To create, maintain, customize, enroll in, register for, and secure your customer account</li> <li>• Administer and support participation in special offers, special pricing, discounts, and promotions</li> <li>• Communicate with you (e.g., for customer service purposes)</li> <li>• Marketing and advertising our products and services</li> <li>• Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns)</li> <li>• For our business operations (e.g., auditing and reporting)</li> <li>• Comply with our legal obligations</li> </ul>	<p>Service Firms, Website and Application Development Companies, Information Technology Services Companies, Data Storage Companies, Data Analytics Companies, and Management Companies); Government Agencies; and Authorized Third Parties.</p>
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		<ul style="list-style-type: none"> <li>• Promote safety, integrity and security, including to prevent fraud</li> <li>• Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	
<p><b>Any categories of personal information described in subdivision (e) of Section 1798.80</b></p> <p>Examples: 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.</p>	<p>Directly from consumers (online or offline)</p> <p>Through the use of our Services (e.g., through cookies or our App)</p> <p>Social Media Companies</p>	<ul style="list-style-type: none"> <li>• Verify your identity</li> <li>• Process payments for goods or services</li> <li>• To provide, support, personalize, and develop our websites, products, and services</li> <li>• Process and fulfill a request or other transaction submitted to us</li> <li>• To complete contracts as well as any disclosures or other documents required by law</li> <li>• To create, maintain, customize, enroll in, register for,</li> </ul>	<p>Services Providers (including DMS Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Website and Application Development Companies, Information Technology Services Companies, Data Storage Companies, Data Analytics Companies, and Management Companies); Government Agencies; and Authorized Third Parties.</p>

		<p>and secure your customer account</p> <ul style="list-style-type: none"><li>• Administer and support participation in special offers, special pricing, discounts, and promotions</li><li>• Communicate with you (e.g., for customer service purposes)</li><li>• Marketing and advertising our products and services</li><li>• Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns)</li><li>• For our business operations (e.g., auditing and reporting)</li><li>• Comply with our legal obligations</li><li>• Promote safety, integrity and security, including to prevent fraud</li><li>• Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</li></ul>	
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		<ul style="list-style-type: none"> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	
<p><b>Characteristics of protected classifications under California or federal law</b></p> <p>Examples: age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>Directly from customers (online or offline)</p> <p>Through the use of our services (e.g., through cookies or our App)</p> <p>Social Media Companies</p>	<ul style="list-style-type: none"> <li>• Verify your identity</li> <li>• To provide, support, personalize, and develop our websites, products, and services</li> <li>• Process and fulfill a request or other transaction submitted to us</li> <li>• To complete contracts as well as any disclosures or other documents required by law</li> <li>• To create, maintain, customize, enroll in, register for, and secure your customer account</li> <li>• Administer and support participation in special offers, special pricing, discounts, and promotions</li> <li>• Communicate with you (e.g., for customer service purposes)</li> <li>• Marketing and advertising our products and services</li> <li>• Research and analytical purposes (e.g.,</li> </ul>	<p>Services Providers (including DMS Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Website and Application Development Companies, Information Technology Services Companies, Data Storage Companies, Data Analytics Companies, and Management Companies); Government Agencies; and Authorized Third Parties.</p>

		<p>identifying trends and effectiveness of marketing campaigns)</p> <ul style="list-style-type: none"> <li>• For our business operations (e.g., auditing and reporting)</li> <li>• Comply with our legal obligations</li> <li>• Promote safety, integrity and security, including to prevent fraud</li> <li>• Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	
<p><b>Commercial Information</b></p> <p>Examples: records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Directly from customers (online or offline)</p> <p>Through the use of our Services (e.g., through cookies or our App)</p> <p>Social Media Companies</p>	<ul style="list-style-type: none"> <li>• Process payments for goods or services</li> <li>• To provide, support, personalize, and develop our websites, products, and services</li> <li>• Process and fulfill a request or other transaction submitted to us</li> <li>• To complete contracts as well</li> </ul>	<p>Services Providers (including DMS Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Website and Application Development Companies, Information Technology Services</p>

		<p>as any disclosures or other documents required by law</p> <ul style="list-style-type: none"> <li>• To create, maintain, customize, enroll in, register for, and secure your customer account</li> <li>• Administer and support participation in special offers, special pricing, discounts, and promotions</li> <li>• Communicate with you (e.g., for customer service purposes)</li> <li>• Marketing and advertising our products and Services</li> <li>• Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns)</li> <li>• For our business operations (e.g., auditing and reporting)</li> <li>• Comply with our legal obligations</li> <li>• Promote safety, integrity and security, including to prevent fraud</li> <li>• Assist us with legal claims, compliance, regulatory and investigative</li> </ul>	<p>Companies, Data Storage  Companies, Data Analytics  Companies, and Management  Companies);  Government Agencies; and  Authorized Third Parties.</p>
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		<p>purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</p> <ul style="list-style-type: none"> <li>Protecting our legitimate business interests and legal rights</li> </ul>	
<b>Biometric Information</b>	None	None	None
<p><b>Internet or other electronic network activity information</b></p> <p>Examples: browsing history; search history; and information regarding a consumer’s interaction with an internet website, application, or advertisement.</p>	<p>Directly from consumers (online or offline)</p> <p>Through the use of our Services (e.g., through cookies or our App)</p> <p>Social Media Companies</p>	<ul style="list-style-type: none"> <li>To provide, support, personalize, and develop our websites, products, and services</li> <li>Process and fulfill a request or other transaction submitted to us</li> <li>To complete contracts as well as any disclosures or other documents required by law</li> <li>To create, maintain, customize, enroll in, register for, and secure your customer account</li> <li>Administer and support participation in special offers, special pricing, discounts, and promotions</li> <li>Marketing and advertising our products and services</li> </ul>	<p>Service Providers (including Computer Software Companies, Website and Application Development Companies, Information Technology Services Companies, Data Storage Companies, and Data Analytics Companies)</p>

		<ul style="list-style-type: none"> <li>• Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns)</li> <li>• For our business operations (e.g., auditing and reporting)</li> <li>• Comply with our legal obligations</li> <li>• Promote safety, integrity and security, including to prevent fraud</li> <li>• Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	
<p><b>Geolocation data</b></p> <p>Examples: the geographic location (latitude and longitude) of an internet-connected device such as a cell phone, tablet or computer or any other device connected to the internet and used to visit our websites or use our applications</p>	<p>Through the use of our Services (e.g., through cookies or our App)</p>	<ul style="list-style-type: none"> <li>• To provide, support, personalize, and develop our websites, products, and services</li> <li>• Process and fulfill a request or other transaction submitted to us</li> <li>• To create, maintain, customize, enroll</li> </ul>	<p>Service Providers (including Computer Software Companies, Website and Application Development Companies, Information Technology Services Companies, Data</p>

		<p>in, register for, and secure your customer account</p> <ul style="list-style-type: none"> <li>• Administer and support participation in special offers, special pricing, discounts, and promotions</li> <li>• Marketing and advertising our products and services</li> <li>• Research and analytical purposes (e.g., identifying trends and effectiveness of marketing campaigns)</li> <li>• For our business operations (e.g., auditing and reporting)</li> <li>• Promote safety, integrity and security, including to prevent fraud</li> <li>• Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	<p>Storage Companies, and Data Analytics Companies)</p>
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<p><b>Audio, electronic visual, thermal, olfactory of similar information</b></p> <p>Examples: information from voicemail messages and/or recorded phone calls, and video surveillance at our stores.</p>	<p>Directly from customers (online or offline)</p>	<ul style="list-style-type: none"> <li>• Verify your identity</li> <li>• To provide, support, personalize, and develop our websites, products, and services</li> <li>• Administer and support participation in special offers, special pricing, discounts, and promotions</li> <li>• Communicate with you (e.g., for customer service purposes)</li> <li>• For our business operations (e.g., auditing and reporting)</li> <li>• Comply with our legal obligations</li> <li>• Promote safety, integrity and security, including to prevent fraud</li> <li>• Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	<p>Services Providers (including DMS Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Website and Application Development Companies, Information Technology Services Companies, Data Storage Companies, Data Analytics Companies, and Management Companies); and Government Agencies</p>
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<p><b>Professional or employment-related information</b></p> <p>Examples: job history, current employer, prior employers, dates of employment, salary and bonus information.</p>	<p>Directly from job applicants (online or offline)</p>	<ul style="list-style-type: none"> <li>• Verify applicant’s identity</li> <li>• To provide, support, personalize, and develop our websites and services</li> <li>• Process and fulfill a request for employment</li> <li>• To complete disclosures or other actions required by law</li> <li>• To create, maintain, customize, enroll in, register for, and secure your employment application</li> <li>• Communicate with you (e.g., for potential employment)</li> <li>• Research and analytical purposes (e.g., identifying trends and effectiveness of employment solicitations)</li> <li>• For our business operations (e.g., auditing and reporting)</li> <li>• Comply with our legal obligations</li> <li>• Promote safety, integrity and security, including to prevent fraud</li> <li>• Assist us with legal claims, compliance, regulatory and</li> </ul>	<p>Services Providers (including DMS Companies, es, Computer Software Companies, Professional Service Firms, Website and Application</p>
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		<p>investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</p> <ul style="list-style-type: none"> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	
<p><b>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))</b></p> <p>Example: information regarding whether a consumer is or will soon be a college graduate</p>	<p>Directly from job applicants (online or offline)</p>	<ul style="list-style-type: none"> <li>• Verify applicant's identity</li> <li>• To provide, support, personalize, and develop our websites and services</li> <li>• Process and fulfill a request for internships</li> <li>• To complete disclosures or other actions required by law</li> <li>• To create, maintain, customize, enroll in, register for, and secure your internship application</li> <li>• Communicate with you (e.g., for potential internships)</li> <li>• Research and analytical purposes (e.g., identifying trends and effectiveness of internship solicitations)</li> </ul>	<p>Services Providers (including DMS Companies, es, Computer Software Companies, Professional Service Firms, Website and Application</p>

		<ul style="list-style-type: none"> <li>• For our business operations (e.g., auditing and reporting)</li> <li>• Comply with our legal obligations</li> <li>• Promote safety, integrity and security, including to prevent fraud</li> <li>• Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</li> <li>• Protecting our legitimate business interests</li> </ul>	
<p><b>Inferences drawn from other personal information</b></p> <p>Examples: information used to create a profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>Directly from customers (online or offline)</p> <p>Through the use of our Services (e.g., through cookies or our App)</p> <p>Social Media Companies</p>	<ul style="list-style-type: none"> <li>• Verify your identity</li> <li>• To provide, support, personalize, and develop our websites, products, and services</li> <li>• To create, maintain, customize, enroll in, register for, and secure your customer account</li> <li>• Marketing and advertising our products and services</li> <li>• Research and analytical</li> </ul>	<p>Services Providers (including DMS Companies, Marketing Companies, Computer Software Companies, Professional Service Firms, Website and Application Development Companies, Information Technology Services Companies, Data Storage Companies, Data Analytics Companies, and</p>

		<p>purposes (e.g., identifying trends and effectiveness of marketing campaigns)</p> <ul style="list-style-type: none"> <li>• For our business operations (e.g., auditing and reporting)</li> <li>• Promote safety, integrity and security, including to prevent fraud</li> <li>• Assist us with legal claims, compliance, regulatory and investigative purposes as necessary (including in connection with law enforcement investigations, legal process, or litigation)</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	<p>Management Companies); Government Agencies; and Authorized Third Parties.</p>
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**8. Your Rights Under the CCPA**

Subject to certain exceptions, the CCPA affords California consumers the following rights:

**a) Right to Know/Access Personal Information Collected, Disclosed or Sold**

You have the right to request that we disclose the following information for the 12-month period preceding your request:

- (1) The categories of Personal Information that we have collected about you;
- (2) The categories of sources from which the Personal Information was collected;
- (3) The business or commercial purpose for collecting or selling the Personal Information;
- (4) The categories of third parties with whom we share the Personal Information; and/or
- (5) The specific pieces of Personal Information we have collected about you.

**b) Right to Request Deletion of Personal Information**

You have the right to request that we delete any Personal Information about you that we have collected or that we maintain.

**c) Right to Not Be Discriminated Against**



You have the right not to receive discriminatory treatment from us for the exercise of the privacy rights conferred by the CCPA and listed in this CCPA Privacy Notice.

**9. Exercising Your CCPA Rights**

- a) **Submitting a Request to Know or Request to Delete.** You may submit a Request to Know or a Request to Delete by contacting us at (866) 921-6714, or by using [this webform](#).
- b) **Verification Methods.** Once you submit a request, we will verify that you are the consumer to which the request pertains by matching data points that you provide with information we maintain. Depending on the type of request you submit, we will attempt to match either two or three of the data points you provided. If we are unable to verify your request with the data points you provided, we may reach out to you for additional information to verify your request.

**10. Authorizing an Agent to Exercise Your Rights**

California consumers have the right to designate an authorized agent to exercise their CCPA rights. To designate an authorized agent, you must either provide the agent with an executed power of attorney or provide the authorized agent with written permission, signed by you, to exercise your CCPA rights. The agent must also be registered with the California Secretary of State.

**11. Individuals with Disabilities**

If you have a disability and need access to our CCPA Privacy Notice in a different format, please contact us at 866-921-6714.

**12. Contact Information**

If you have any additional questions or concerns about our privacy policies and practices, please contact us via email at: [DataPrivacy@kloeckner.com](mailto:DataPrivacy@kloeckner.com).

**Last Updated: 2021**