

# ASC Profiles LLC Privacy Policy

Last Modified: December 31, 2019

## 1. Introduction

For purposes of this Privacy Policy, references to "we," "our," and "us" mean ASC Profiles LLC. We own and operate the websites at [www.ascprofiles.com](http://www.ascprofiles.com), [www.aepspan.com](http://www.aepspan.com), [www.ascsteeldeck.com](http://www.ascsteeldeck.com), [www.ascbp.com](http://www.ascbp.com), [www.simplytoughmetalbuildings.com](http://www.simplytoughmetalbuildings.com), [www.steelscape.com](http://www.steelscape.com) ( each the "Website"). This Privacy Policy explains how and why we collect, use, and disclose information about you collected through the Website. If you do not agree with our policies and practices, your choice is to not use our Website. We reserve the right to change, modify, add, or remove portions of this Privacy Policy from time to time. We will not, however, retroactively change how we share your personal information without your consent. We will provide notice of any material changes through the Website or by other means as we deem appropriate before they take effect. Please check back periodically for any changes we may make to the Privacy Policy. Your continued use of the Website following the posting of changes to this Privacy Policy means you accept these changes.

## 2. Personal Information We Collect

When you interact with the Website, we may collect information—some of which may identify you—such as:

- First and last name;
- Company name;
- Occupation;
- Customer code;
- Username and password;
- Personal website URLs;
- Social media account names and URLs;
- 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 resume information; and

- Personal information you choose to provide in "comment," "question," and other narrative forms.

We refer to information that can identify you as "personal information." We may also collect general information about the equipment you use to access the Website, your operating system and browser type, the services that you use, times and dates of your interactions with the Website, details of your transactions through and interactions with the Website, 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.

### 3. 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 Website, such as approximate location, data on browsing activities and patterns, times and dates of logins, and event data.
- From third parties, including analytics providers, that we use to operate the Website and its services.
- From social media platforms linked from the Website, such as Facebook, LinkedIn, Twitter, Pinterest, Instagram, and YouTube, if you "Like," "Follow," or use a lead generation form or otherwise interact with our page or profile on that platform.

Automatic data-collection technologies we use include cookies and web beacons, which are described briefly below:

**Cookies (or browser cookies).** The Website uses cookies. A "cookie" is a small file 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 to participate in activities or events on the Website. 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 Website.

**Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. 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](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 Website 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"). We may include web beacons in the Website pages and email messages. Web beacons may be used to count visitors to the Website, to monitor how users navigate the Website, and to count how many emails that we send are actually opened.

#### **4. How We Use Your Personal Information**

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

- Presenting our Website and its contents to you.
- Providing the information, goods, and services you've requested or agreed to receive.
- Enabling you to interact with Website features and improving the Website's performance when you return to the Website.
- Enabling you to participate in promotions through the Website.
- 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 Website.
- Informing you about new features of the Website.
- Marketing our products and services to you and sending you marketing materials that may be of interest to you.
- For any other purpose disclosed by us when you provide the information.

#### **5. 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 Website, design and operate the Website features, and perform administrative, analytics, payment processing, advertising, and communications services. Services these parties provide include processing your payments made through the Website, enabling us to send you email newsletters and marketing materials, and providing information to us about the use of the Website 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 Website. 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 Website. 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 Website 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 Terms of Use and Terms & Conditions of Sale [INSERT HYPERLINK TO THESE PAGES], 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 Website, its users, or the public.

**Business Transfer.** We reserve the right to disclose and transfer all information related to the Website, including, without limitation, your personal information and usage information: (i) to a subsequent owner, co-owner, or operator of the Website 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.

## **6. 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.

## **7. 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 Website, 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. Nor does this Privacy Policy apply to information we collect by other means (including offline) or from sources other than through the Website.

## **8. Security**

Personal information is stored in secure operating environments that are not available to the public. In some instances, personal information is encrypted during storage and transmission. Only those of our employees and agents who need access to your personal information to do their jobs are allowed access, each having signed confidentiality agreements or otherwise subject to a duty of confidentiality.

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 Website, and you assume all related risks.

## **9. Other Information**

**Cross-Border Transfer.** The Website 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 and continue to 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 Website does not respond to DNT signals.

**Children Under 16.** The Website 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 Website or submit any personal information through the Website.

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

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

If you choose not to provide personal information, you may be unable to access or use the Website or certain Website 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.

Depending on the law that applies where you live, you may have additional rights. California residents should see <https://www.ascprofiles.com/wp-content/uploads/ASC-CCPA-Notice-for-California-Consumers.pdf> for more information.