



## COMMERCIAL METALS COMPANY

### Website Privacy and Cookies Policy

**Effective Date:** January 18, 2019

#### Overview

The administrator of this website, and controller of the personal data processed about visitors to this website, is Commercial Metals Company, the contact information for which is available [here](#). Any Visitors may contact CMC European business operations directly by clicking [here](#). This Website Privacy and Cookies Policy ("Privacy Policy") describes how Commercial Metals Company, as well as our subsidiaries and affiliates, excluding European subsidiaries ("CMC", "our," "us" or "we"), collects, uses and shares information about you, including when you use our websites, email notifications, mobile applications, social media applications, widgets, and other online services (the "Services"), as well as your choices and rights related thereto. By using any of our Services, you consent to the collection, use, and disclosure of your information as described in this Privacy Policy.

The rules stipulated in this Privacy Policy by the controller do not apply to Commercial Metals Company subsidiaries located in the European Union.

#### Summary of Key Points

<b>Information Collection and Use</b>	As a generally business-to-business ("B2B") organization, we collect name, contact details, and other Personal Data related to our commercial relationships and we use Personal Data related to purchases, customer service, feedback, site registration, analytics, marketing, location-based services, recruiting and hiring, and to fulfill other business and compliance purposes. <a href="#">Click here to learn more.</a>
<b>Security</b>	We maintain commercially reasonable technical and organizational measures and safeguards to protect Personal Data from loss, misuse, alteration, or unintentional destruction. <a href="#">Click here to learn more.</a>
<b>Cookies</b>	We use cookies related to the Services, and provide choices on use of cookies, including third party targeting and advertising. <a href="#">Click here to learn more.</a>
<b>Information Shared with Third Parties</b>	We share Personal Data as necessary to perform transactions, respond to requests, and to fulfill other business and compliance purposes. <a href="#">Click here to learn more.</a>
<b>Links to Third Party Sites</b>	While our Services may contain links to social media sites and other websites and mobile applications that are operated and controlled by third parties, we do not take responsibility for the content or the privacy practices employed by other sites. <a href="#">Click here to learn more.</a>

<b>Accessing the Services from Outside of the United States</b>	Personal Data provided to us or otherwise obtained by us is processed in the United States in order to perform the Services or as otherwise described in this Privacy Policy. We provide appropriate protections for cross-border transfers where specified by law. <a href="#">Click here to learn more.</a>
<b>Your Choices and Rights</b>	You have control over how we use Personal Data for direct marketing and you may have certain rights to request access, rectification, deletion, or other actions regarding your Personal Data where required by applicable law. <a href="#">Click here to learn more.</a>
<b>Other issues</b>	We provide other information in this Privacy Policy about: (i) the legal basis for collecting and processing Personal Data, (ii) the consequences for not providing Personal Data, (iii) automated decision-making, (iv) data retention, and (v) employee and contractor issues. <a href="#">Click here to learn more.</a>
<b>Changes</b>	If we make material changes to this Privacy Policy, we will post a notice on our website before the changes go into effect. <a href="#">Click here to learn more.</a>
<b>Contact us</b>	Please contact us as detailed below with any questions. <a href="#">Click here to learn more.</a>

### **Information Collection and Use**

Through your use of the Services we may collect from you personally identifiable information ("Personal Data"), which is information that identifies you, including:

- Your name, e-mail, username, phone number, company, title, and address ("Contact Information").
- Your credit card number, expiration date, billing address, shipping address, security code, and other payment transaction and verification details ("Payment Information").
- Data about individual participation in trade shows, and conferences, credentials, associations, product/service interests, query information, and preferences ("Marketing Information").
- Data provided by job applicants or others on via the Services or offline means in connection with employment opportunities ("Job Applicant Information").

We may also collect additional information from or about you, including:

- Pages and products viewed, items added to your shopping cart, ads that you clicked on, e-mails from us that you opened, browser type, operating system, IP address, device information, cookies and other data linked to a device, and data about usage of the Services ("Analytical Information").
- Information that does not identify you by name or individually, such as aggregated data, and/or anonymous or de-identified information ("Non-Personal Information").



- We may also collect publicly available information about you from third-party sources, such as the postal service, for shipping address verification.

In certain jurisdictions, Analytical Information and Non-Personal Information may be considered to be Personal Data, in which cases it will be treated as such.

Information that we collect from you will only be retained as long as required for the purposes described below.

We use your information for the following purposes:

- **Purchases:** We use your Contact Information and Payment Information to allow us to process and fulfill purchases you make through the Services.
- **Customer Service:** We use your Contact Information to receive and respond to your questions about products, services or warranties. To address your question, we may also request additional information about you and/or your transaction(s).
- **Feedback:** We use your username, email address, products purchased, and other user-generated content that you may provide when you rate and review our products and participate in community forums (e.g., message boards and blogs).
- **Site Registration:** We use your Contact Information when you create an account through any of our Services. In order to provide you with a more personalized user experience, we may also utilize Analytical Information, user-generated content and other information that you provide to us.
- **Analytics:** When you use the Services, we automatically collect and use Analytical Information in order for us to continually improve your experience with our Services, protect the security and effective functioning of our Services and information technology systems.
- **Marketing:** We may use your Contact Information, Marketing Information, and Analytical Information to provide you with marketing communications, unless you have opted out of such communications, and to conduct market research or, where opt-in consent is required by law, where you have not opted-in to receiving such communications.
- **Location-Based Services:** To allow you to locate the nearest retailer to purchase our products, we may collect your address, zip code, and, with your permission, location information on your mobile or other device.
- **Recruiting and Hiring:** Where you have expressed an interest in a position with CMC, we may use your Contact Information and Job Applicant Information to consider you for employment and contractor opportunities and manage on-boarding procedures.
- **Compliance:** We use your Contact Information, Payment Information, Job Applicant Information, and Analytical Information to help address our compliance and legal obligations and exercise our legal rights.

## **Security**

We maintain commercially reasonable technical and organizational measures and safeguards to help protect your Personal Data from loss, misuse, alteration, or unintentional destruction, including requiring, where required by law or as otherwise appropriate, that service providers who access or handle Personal Data on our behalf maintain such safeguards. We seek to encrypt credit card numbers from e-commerce transactions conducted on our site using secure socket layer (SSL) technology.

However, no method of Internet transmission or electronic storage is 100% secure or error-free, so, unfortunately, we cannot guarantee absolute security. It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when you are finished using a shared computer. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please notify us immediately by contacting your normal business contact or account representative or by email utilizing the form found [here](#).

## **Cookies**

We use "cookies," a small text file transferred to your device, along with similar technologies (e.g., internet tag technologies, web beacons, and embedded scripts) (collectively, "cookies") to help provide you a better, more personalized user experience. More information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

*How do we use cookies?*

We use cookies to:

- Make the user experience more efficient (e.g., maintaining items in your Shopping Cart between visits).
- Remember your preferences (e.g., browsing language, account login information).
- Help us understand and improve how visitors use our site, including which of our pages and products are viewed most frequently.

We may also allow third parties to place cookies on your device through the Services to:

- Help us understand and improve how visitors use our site, including which of our pages and products are viewed most frequently.
- More effectively market our products and services and advertise other products and services that may be of interest to you.
- Obtain your feedback on our products and the Services.
- Allow you to engage in our social media offerings (e.g., clicking the "Like" button on our site).



Cookies we use for the Services are generally divided into the following categories:

- **Strictly Necessary Cookies:** These are required for the operation of the Services. These cookies are session cookies that are erased when you close your browser.
- **Analytical/Performance Cookies:** These allow us to recognize and count the number of users of the Services and understand how such users navigate through the Services. This helps to improve how the Services work, for example, by ensuring that users can find what they are looking for easily. These cookies are session cookies which are erased when you close your browser. We use Google Analytics, and you can see below for how to control the use of cookies by Google Analytics.
- **Targeting Cookies:** These record your use of the Services and the pages you have visited. You can delete these cookies via your browser settings. We also work with third party advertising companies who place their own cookies or similar technology on your browser or device when you visit our website and other third-party websites, in order to serve customized advertisements to you as you browse the Internet. See below for further details on how you can control third party targeting cookies.

*What are your options if you do not want cookies on your device?*

The Options/Settings section of most internet browsers will tell you how to manage the cookies and other technologies that may be transferred to your device, including how to disable such technologies. Although not all cookies and similar technologies that we use are required for you to use the Services, disabling these technologies altogether could prevent the Services from working properly and disable features that allow you to take full advantage of the Services we offer. Certain third party cookie providers may also offer opt-outs of tracking for their specific cookies. For example, Google offers an opt-out for Google Analytics, a third-party cookie utilized by us, if you download and install the Google Analytics opt-out browser add-on by visiting: <https://tools.google.com/dlpage/gaoptout>.

You can generally opt-out of receiving interest-based advertisements from members of the Network Advertising Initiative or the Digital Advertising Alliance by visiting their opt-out pages: (<http://www.networkadvertising.org/choices/>) and (<http://www.aboutads.info/choices/>). When you opt-out using these links, please note that you may still receive advertisements. They just will not be personalized based on your interests.

Some web browsers incorporate a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the "Do Not Track" signal, our site does not currently interpret, respond to or alter its practices when it receives "Do Not Track" signals.



## **Information Shared with Third Parties**

We only share your Personal Data with companies, organizations and individuals outside of CMC as described below:

- *Affiliates and Business Partners.* We may share your Personal Data with CMC's corporate affiliates, as well as other companies, including our unaffiliated dealers, manufacturers, and suppliers in order for these companies to contact you about their products, services or other offerings that may be of interest to you. We may also transfer your Personal Data to other CMC owned business entities in the US and worldwide, excluding European subsidiaries (see our list of subsidiaries and affiliates). By accessing our websites, registering for an account or service with us, or otherwise providing your Personal Data to us, to the extent required by applicable law and where an alternative legal basis does not apply, you consent to this transfer of your Personal Data throughout the global CMC network of entities. To the extent required by applicable law, you may have choices regarding these disclosures, please see the [Your Choices and Rights](#) section below. This Privacy Policy does not govern unaffiliated third-party websites or any other website that does not link to this Privacy Policy.
- *Service Providers.* We may share your Personal Data with affiliated and unaffiliated companies that perform tasks on our behalf related to our business. Such tasks include, processing payments, fulfilling orders, delivering packages, locational services, analyzing site usage data, customer service, electronic and postal mail service, marketing services and social commerce and media services (e.g., Facebook, ratings, reviews and forums). Third-party service providers only receive your Personal Data as necessary to perform their role, and we instruct them not to use your Personal Data for any other purposes.
- *Auditors and advisors.* We may share your Personal Data with auditors for the performance of audit functions, and with advisors for the provision of legal and other advice.
- *As Required or Appropriate by Law.* We will use and disclose your Personal Data as necessary or appropriate:
  - under applicable law, including laws outside your country of residence, to comply with legal process, and to respond to requests from public and government authorities including public and government authorities outside your country of residence;
  - to enforce our terms and conditions, including investigations of potential violations thereof;
  - to detect, prevent, or otherwise address fraud, security or technical issues;
  - to protect our operations or those of any of our affiliates; to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and to allow us to pursue available remedies or limit the damages that we may sustain.
- *Business Transfers.* We may transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets.
- *Based on Your Consent.* We may share or disclose your Personal Data at your direction or subject to your consent.



We may share aggregated, Non-Personal Information publicly and with our partners – such as publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services or products.

We do not share, sell, rent or trade your information to our affiliates, subsidiaries, service providers or business partners for their own direct marketing purposes, unless we have explicitly given you the option to opt-in or opt-out of such disclosures in accordance with applicable law.

### **Links to Third-Party Sites**

Our Services may contain links to social media sites and other websites and mobile applications that are operated and controlled by third parties. While we try to link only to sites that share our high standards and respect for privacy, we do not take responsibility for the content or the privacy practices employed by other sites. Unless otherwise stated, any Personal Data that you provide to any such third-party site will be collected by that party and not by us, and will be subject to that party's privacy policy, rather than this Privacy Policy. In such a situation, we will have no control over, and shall not be responsible for, that party's use of the Personal Data or any other information that you provide to them.

### **Accessing the Services from Outside the United States**

Personal Data collected through the Services is stored on servers in the United States and elsewhere as part of the transactions related to the Services. We provide appropriate protections for cross-border transfers as required by applicable law for international data transfers. With respect to transfers originating from the European Economic Area ("EEA"), we implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers as required by applicable law. Where required by such laws, you may request a copy of the suitable mechanisms we have in place by contacting us [here](#). To the extent your consent is necessary for such transfers as required to utilize the Services, by using any of our Services, you consent to the transfer of your information to CMC in the United States and other countries, including those in which CMC's affiliates and subsidiaries operate.

### **Your Choices and Rights**

If you have created an online account with us and would like to update the information you have provided to us, you can access your account on the site to view and make changes or corrections to your information. To the extent required by applicable law, you may have choices regarding these transfers and disclosures described in this Privacy Policy, and/or additional rights to access, obtain, correct, modify, rectify, block, port, restrict, erase or delete Personal Data that we hold about you, withdraw your consent (without affecting the lawfulness of processing based on consent before its withdrawal), and/or obtain additional information regarding the protections in place for transfers of your Personal Data. If you wish to exercise these rights to the extent applicable, please contact us as described in the [Contacting Us](#) section. You may also have the right to object to

certain processing of your Personal Data, in particular, related to direct marketing. If you do not want to receive marketing or other communications from us, please use the unsubscribe method provided in our communications, or e-mail us by utilizing the form found [here](#). If there are any issues that you cannot resolve directly with us, where provided by applicable law, you may also contact your local data protection authority. Please note that we may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, to establish or defend legal claims, or for other purposes as required or permitted by law.

### **Other Issues**

#### *(i) What is the legal basis of processing?*

Some jurisdictions require an explanation of the legal basis for collecting and processing Personal Data. We have several different legal grounds on which we collect and process Personal Data, including: (i) as necessary to perform a transaction (such as when we respond to your requests); (ii) as necessary to comply with a legal obligation (such as when we use Personal Data for recordkeeping to substantiate tax liability); (iii) consent (where you have provided consent as appropriate under applicable law, such as for direct marketing or certain cookies); and (iv) necessary for legitimate interests (such as when we act to maintain our business generally, including maintaining the safety and security of the Services). With respect to legitimate interests, given that we are generally a B2B company, we typically collect and process limited Personal Data about customer contacts and other individuals acting in their business capacities, as part of our overall effort to reduce the privacy impact on individuals.

#### *(ii) What are the consequences of not providing Personal Data?*

You are not required to provide all Personal Data identified in this Privacy Policy to use the Services or to interact with us offline, but certain functionality will not be available if you do not provide certain Personal Data. If you do not provide certain Personal Data, we may not be able to respond to your requests, perform a transaction with you, or provide you with marketing that we believe you would find valuable.

#### *(iii) Do we engage in automated decision-making without human intervention?*

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you.

#### *(iv) How long do we retain Personal Data?*

We typically retain Personal Data for no longer than the period necessary to fulfill the purposes outlined in this Privacy Policy, and as otherwise needed to address tax, corporate, compliance, employment, litigation, and other legal rights and obligations.

#### *(v) How does CMC handle employee and contractor privacy issues?*



Personal Data about our employees and contractors are addressed through internal company policies and procedures, and are outside the scope of this Privacy Policy.

### **Changes**

We may update this Privacy Policy from time to time. If we make material changes to this Privacy Policy, we will post a notice on our website before the changes go into effect. Please check the "Effective Date" at the beginning of this Privacy Policy to see when this Privacy Policy was last revised. Your continued use of the Services following any changes to this Privacy Policy indicates your consent to the practices described in the revised Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.

### **Contacting Us**

To submit questions about this Privacy Policy or information we have collected about you, customers should contact your normal business contact or account representative. Other website visitors may contact us by email utilizing the Privacy Inquiry form found [here](#) or by postal mail at:

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