INTRODUCTION

Welcome to our Privacy Policy for our website, srjsteel.com ("Website") of SRJ Steel, LLC ("SRJ" or "we" or "us").

We respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our Website (regardless of where you visit it from) and tell

you about your privacy rights.

By using our Website, you consent to the data practices described in this Privacy Policy. If you do not agree with the

data practices described in this Privacy Policy, you should not use our Website.

IMPORTANT INFORMATION AND WHO WE ARE 1.

2. THE DATA WE COLLECT ABOUT YOU

3. HOW WE COLLECT YOUR PERSONAL DATA

4. HOW WE USE YOUR PERSONAL DATA

DISCLOSURES OF YOUR PERSONAL DATA 5.

**DATA SECURITY** 6.

7. DATA RETENTION

8. YOUR RIGHTS

9. CALIFORNIA RESIDENT'S PRIVACY RIGHTS

1. IMPORTANT INFORMATION AND WHO WE ARE

> By dealing directly with producers, SRJ provides customers ongoing supply of enameling steel at a competitive cost. SRJ has over 20 years' experience selling enameling steel to a variety of customers, big and small. We work closely with our customers to develop supply programs that meet their manufacturing

> needs. By utilizing multiple storage and processing strategically located across the US and Canada, we keep

costs and delivery timing to a minimum.

SRJ practices "Enamellurgy" with dedicated technical resources and over 3 decades experience working with vitreous enameling steel. Our team includes a degreed metallurgical engineer who has travelled extensively throughout North America to resolve technical issues related to enamel steel performance.

**Purpose of this Privacy Policy** 

This Privacy Policy aims to give you information on how LFI collects and processes your personal data through your use of this Website, including any data you may provide through this Website when you sign up to our newsletter or purchase a product or service. We do not sell your personal data. We may use your

personal data that you provide to market our products to you.

**SRJ's Contact Information** 

SRJ Steel, LLC

Our contact details are:

Privacy Officer: Pete Dennen, President

Email address: pete@srjsteel.com

Postal address: 1438 Hillsboro Avenue, S.E., Grand Rapids, Michigan 49546

### Changes to this Privacy Policy and Your Duty to Notify Us of Changes

We will notify you of any changes to this Privacy Policy. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

# **Third-Party Links**

This Website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the Privacy Policy of every website you visit.

### 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified.

We or our service providers may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, last name, username or similar identifier, and picture.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes payment card details, account numbers, expiration dates.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our Website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We use some of the personal information you provide us to conduct some level of automated decision-making -- for example, we use certain personal information (for example, IP addresses or payment information) to automatically block certain potentially fraudulent transactions for a short period of time. We will not collect materially different information than the categories of information described above without first providing you notice.

## **Canadian and European Union Users**

We may collect personal data from Canadian and European Union users. If you are from the European Union or Canada, by using this Website, you consent to the transfer, processing, and storage of your data in the

United States. You have rights, as set forth below, with respect to your information. If you do not consent to the transfer of your information, you must cease using this Website.

#### **Minor Users**

This Website is not intended for children and we do not knowingly collect data from children consistent with the U.S. Children's Online Privacy Protection Act. If we learn that we have received information directly from a child under age 18 without the parent or legal guardian's verified consent, we will use that information only to respond to the child/parent/guardian to inform the child that he or she may not use the Website.

#### 3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our Website;
- personalize, customize, your profile on the Website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- conduct a survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our Website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy for further details.

Third-party sources. We may receive personal data about you from various third parties including our third-party service providers. We employ other companies and individuals to perform functions upon our behalf. Examples include storing and analyzing data, providing search results and links (including paid listings and links), providing customer service, and payment processing. They have access to user information needed to perform their functions, but may not use it for other purposes.

# 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: (a) where we need to perform the contract we are about to enter into or have entered into with you; (b) where it is necessary for our legitimate interests (or those of a third party) and your interests and rights do not override those interests; (c) where we need to comply with a legal or regulatory obligation. We use your data in the following ways:

- To register you as a new guest;
- To process and deliver your order, manage payments, fees, and charges;

- To manage our relationship with you;
- To deliver pop-up reminders of items in your cart;
- To enable you to complete a survey;
- To administer and protect our Website;
- To deliver relevant Website content to you;
- To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To make suggestions and recommendations to you about goods or services that may be of interest to you.

We will not use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Email and Text Messaging Marketing and Outreach**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. You can manage the marketing and outreach we provide to you by opting out, which is described in the "Opting Out" section below.

# **Opting Out**

You can ask us to stop sending you marketing messages at any time by replying to a marketing email with "unsubscribe" in the subject line, clicking "unsubscribe" in the marketing email itself, or by Contacting us at any time.

By entering your phone number into our Website, you consent to receive marketing messages at the number provided. Consent is not a condition of purchase. Message and data rates may apply. Message frequency varies. Reply HELP for help or STOP to cancel.

### Cookies

We may place "cookies" on the browser of your computer. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. Cookies may enhance the convenience and use of the Website. For example, the information provided through cookies may be used to recognize you as a previous user of the Website (so you do not have to enter your personal information every time), offer personalized information for your use, and otherwise facilitate your experience using the Website. You may choose to decline cookies if your browser permits, but doing so may affect your ability to access or use certain features of the Website.

#### **Web Beacons**

We may also utilize web beacons on our Website. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. The information collected through these automated means may include information that we gather and store about your visit to, and use of, the Website, such as your IP address, type of browser and operating system used, date and time you access the Website, pages you visit, and, if you linked to the Website from another website, the address of that website. This data does

not include Personal Information and is not treated as Personal Information under this Privacy Policy, but it may include the IP address of your device. We may link an IP address to information that is personally identifiable.

### 5. DISCLOSURES OF YOUR PERSONAL DATA

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our site, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. Those trusted third-party partners may:

- Provide you and members with various services
- Provide database maintenance and security
- Help us manage transactions
- Help us process and fulfill orders, transactions, donations, or requests

We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

### 6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### 8. YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. For example, you may have the right to do the following:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.

- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent to us processing your personal data.

Inquiries or complaints regarding the processing of personal data should be directed to SRJ at [insert same email address for privacy matters as above]. SRJ commits to resolve complaints about our collection or use of your personal information.

# 9. CALIFORNIA RESIDENT'S PRIVACY RIGHTS

In addition to the rights set forth above in Section 9, California residents have additional privacy protections.

SRJ does not respond to Do Not Track (DNT) signals. For more information regarding our tracking activities, see our Cookie and Web Beacon Policies in Section 4 above.

California's "Shine the Light" law permits individual California residents to request certain information regarding our disclosure of certain categories of Personal Information to third parties for those third parties' direct marketing purposes. To make such a request, please contact us at [insert same email address for privacy matters as above]. This request may be made no more than once per calendar year.