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|  <b>Russel Metals</b><br><b>Operating Policy &amp; Procedures</b> | Page Number: <b>1</b>                    | Date: <b>January 23, 2012</b> |
|  | Version: <b>1.0</b>                      | Supersedes: <b>0.0</b>        |
| Created by: <b>Corporate Records</b>   | Title: <b>Customer Privacy Statement</b> |                               |

**Scope**

This policy applies to customer information we collect in Canada and the United States. This Privacy Policy is based on federal, provincial and state privacy legislation.

Russel Metals has a Privacy Statement for its Personal Information practices and specific Policies relating to its employees and other stakeholders. These privacy Policies are available at [www.russelmetals.com](http://www.russelmetals.com), or by contacting our Privacy Officer.

**Accountability**

Each employee, director and officer of Russel Metals is responsible for the Personal Information under his or her possession or custody, including information that has been transferred to a third party for processing. In addition to establishing this Policy, we have appointed a Privacy Officer, who is accountable for our compliance with this Policy and the principles outlined herein.

**Information We Collect**

We collect your information from the following sources:


- Information you give us, such as during transactions, customer service operations and credit applications.
- Information from other sources, such as companies that help us to update our records; and
- Information automatically collected when you visit our websites, such as via cookies

Russel Metals collects Personal Information for the following purposes:

- To establish and maintain responsible commercial relations with you;
- To provide you with credit;
- To understand your needs and meet your product specifications;
- To recommend particular products and services to meet your needs; and
- To meet legal and regulatory requirements; and

**Consent**

Russel Metals will only collect, and use or disclose your Personal Information with your consent, except in limited circumstances. You may withdraw or limit your consent to our collection, use or disclosure of your Personal Information at any time, subject to any legal or contractual restriction and reasonable notice and we will explain the implications of such withdrawal. We will

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not use or disclose your Personal Information without your consent except in the following circumstances:

- When required by law or for law enforcement or investigatory purpose;
- For an emergency that threatens life, health or security;
- For the purpose of collecting on a debt owed to Russel Metals;
- Disclosure if required to investigate a breach of contract; and
- If the information is publicly available and specified in the applicable regulations.

**Limiting Collection**

Russel Metals shall limit the collection of Personal Information to that which is necessary for the purposes identified and we shall collect the information by fair and lawful means.


The type of information we usually collect and maintain in our customers' files may include your:

- Name
- Mailing and local Address
- Email Address
- Telephone Number
- Fax Number
- Social Insurance Number/Social Security Number
- Date of Birth
- Credit History
- Banking information
- Credit card information
- Transaction History
- Driver's License Number

Personal Information is information that refers to you specifically. With your consent, we may collect Personal Information from you in person, over the telephone, or by corresponding with you via mail or the Internet.

**Limiting Use, Disclosure, and Retention:**

Russel Metals shall not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Russel Metals retains Personal Information only for as long as necessary to achieve fulfillment of the identified purpose.

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There are some unavoidable types of disclosure of your Personal Information which may occur occasionally as part of Russel Metals fulfilling its routine or regulatory obligations and/or conducting its business in the ordinary course. In those instances where we do provide Personal Information to third parties, we provide only that information that is required in the circumstances and we will subject the third parties to strict confidentiality provisions that have been designed to protect the privacy and security of your information. We will ensure that these third parties are made aware of and comply with this Policy and we will disclose the information to them only to the extent necessary to allow them to provide business services or support to Russel Metals. Third parties may include:

- (i) a collection agency for the purpose of the collection of past due amounts; or
- (ii) a service provider that has been engaged by Russel Metals to perform certain services for us, for example, business partners, consultants and suppliers to Russel Metals

Russel Metals collects Personal Information primarily from its customers but it may also collect Personal Information from other sources including credit bureaus, your suppliers including financial institutions or business and personal references.


**Accuracy**

Russel Metals will ensure that Personal Information collected shall be as accurate, complete and up-to-date as is necessary for the purposes for which it was obtained. While we will do our best to base our decisions involving Personal Information on accurate information, we rely on you to disclose all material information and to inform us of any relevant changes to their Personal Information.

If you believe that any of your Personal Information is inaccurate, you may ask us to correct it. We will respond to your request to update or correct your Personal Information as soon as possible.

**Safeguards: Protecting Personal Information**

Russel Metals will protect Personal Information by using security safeguards appropriate to the sensitivity of the information. We review our procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate. Russel Metals shall protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. The nature of the safeguards will vary

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depending on the sensitivity of the information that has been collected, the amount, distribution and format of the information, and the method of storage.

Russel Metals protects all Personal Information regardless of the format in which it is held. The methods of protection include:

- (i) Physical measures such as locked filing cabinets and restricted access to cabinets and offices;
- (ii) Organizational measures, such as security clearances and limited access on a “need to know” basis;
- (iii) Technological measures, such as the use of passwords and encryption.

**Openness**

We have prepared this Privacy Policy to make you aware of our policies and procedures relating to the management of Personal Information. It is available to the public online at [www.russelmetals.com](http://www.russelmetals.com).

**Individual Access**

In most instances, Russel Metals will grant individuals access to their Personal Information upon presentation of a Personal Information Request/Compliant form, which can be obtained on our website or from the Privacy Officer. You also have the right to know of the existence, use, and disclosure of your Personal Information. If we deny your request for access to your Personal Information, we will advise you in writing of the reason for the refusal and you may then challenge our decision.

**Challenging Compliance**

You may address a challenge concerning compliance with the above principle as outlined to the Privacy Officer as follows:

The Privacy Officer  
 Russel Metals  
 Suite 210, 1900 Minnesota Court  
 Mississauga ON L5N 3C9  
 Or by email to [privacyofficer@russelmetals.com](mailto:privacyofficer@russelmetals.com)  
 Or by telephone to (905) 819-7367

To access or correct Personal Information or to file a privacy complaint, forward a completed *Personal Information Request/Complaint Form* to the Privacy Officer. See attached form.



## PERSONAL INFORMATION REQUEST/COMPLAINT FORM

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Company: \_\_\_\_\_

*(Please indicate how you would like to receive the information)*

**By Mail (provide address):** \_\_\_\_\_

**By Telephone (provide number):** \_\_\_\_\_

**By Fax (provide number):** \_\_\_\_\_

**By Email (provide address):** \_\_\_\_\_

*Please check appropriate box*

**I wish to file a Request for:** **OR**  **I wish to file a Complaint**

Access to my own personal information

Correction to my own personal information

*(Please state briefly the nature of your Request or Complaint)*

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\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Send completed Request/Complaint form to the Privacy Officer, at [privacyofficer@russelmetals.com](mailto:privacyofficer@russelmetals.com) or to fax (905) 819-7292.**

**FOR PRIVACY OFFICE USE ONLY:**

Date Received: \_\_\_\_\_

Received by (print name): \_\_\_\_\_

Date Acknowledged: \_\_\_\_\_

Acknowledged by (print name): \_\_\_\_\_

Date of Response: \_\_\_\_\_

Response by (print name): \_\_\_\_\_