

<b>Russel Metals Group of Companies</b>		Page Number:	Date: <b>July 1, 2011</b>
<b>Human Resources Policy &amp; Procedures</b>		Version: Policy No: HR 1- 4	Supersedes:
Scope of Policy: <b>All Russel Metals Group of Companies</b>	Title: <b>Privacy Policy Statement</b>		

## **Our Commitment to Privacy**

Protecting the privacy and confidentiality of personal information is an important aspect of the way Russel Metals Inc. conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible and reasonable manner is fundamental to our daily operations.

Russel Metals strives to protect and respect the personal information of its employees, customers, business partners and shareholders in accordance with all applicable provincial, state and federal laws. Each employee of Russel Metals must adhere to this privacy policy when handling personal information. We shall make readily available our policies and practices relating to the management of personal information. Our Privacy Policy can be obtained from our website, internally on our Employee Portal or by contacting the Privacy officer.

## **Application**

This Privacy Policy outlines Russel Metals' commitment to privacy and establishes the methods by which privacy is ensured. It applies to all personal information within Russel Metals' possession and control.

Personal information is defined as any identifying information about an individual or group of individuals including name, date of birth/age, address, phone number, e-mail address, social insurance/security number, nationality, race/ethnic origin, gender, health information, income, marital status, religious or political beliefs, education, criminal records, drivers license/driving record, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

Business information is defined as business name, business address, business telephone number, names of owners, executive officers and directors, job titles, business registration numbers and financial status.

## **Consent**

Consent occurs and is obtained when an individual signs an application or other form containing personal or business information, thereby authorizing Russel Metals to collect, use and disclose the individual's personal or business information for the purposes stated on the form or in the Appropriate Use section of this policy.

- Implied consent is granted by the individual where consent may reasonably be inferred from the action or inaction of the individual or business. This allows Russel Metals to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant or business partner.

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- Consent may be given by an authorized representative, such as a legal guardian or power of attorney.
- Consent may be withdrawn at any time subject to legal or contractual restrictions provided reasonable notice is given.
- Only that information which is reasonably required to fulfill the contract/provide the service will be collected.

### **Appropriate Use**

Russel Metals collects and uses personal information solely for the purpose of conducting business, providing benefits to employees and developing an understanding of its customers. We hereby assert that personal information will only be used for the following purposes:

1. To verify that an employee is eligible to work in either Canada or the United States, to pay the employee and to report information to the appropriate government agencies;
2. To provide group benefits and/or pensions to employees and/or their dependents;
3. To verify that an individual has sufficient and acceptable credit references to establish a credit account and/or to accept some form of payment.

### **Policy Statements**

1. Russel Metals assumes full accountability for the personal information within its possession and control. We have appointed a Privacy Officer who is responsible for adherence to the privacy legislation and who has the authority to intervene on privacy issues relating to Russel Metals' operations. The Privacy Officer may delegate responsibilities to other individuals within the Company to act on his/her behalf.
2. Russel Metals obtains personal/business information directly from the individual or business to which the information belongs. Individuals and businesses are entitled to know how we use the information we collect. The Company has documented the purposes for the use of this information and will collect only the information that is necessary for the purposes identified. We will not use the information for a different purpose without the consent of the individual or business. Certain departments have developed Guidelines and Restrictions as to the use, protection, disclosure and accessibility of this information collected through our corporate office and our branches. These departments are Human Resources, Payroll, Credit, Information Systems and Investor Relations. Each of the departments' Practices and Procedures are governed by this policy.

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3. Under no circumstances will Russel Metals sell, distribute or otherwise disclose personal information or contact lists to third parties. However, limited disclosure may be required as part of our fulfilling our stated business duties and day-to-day operations. This means that personal information may be disclosed to third parties such as consultants, suppliers or business partners of Russel Metals, but only with the understanding that these parties obey and abide by this Privacy Policy, to the extent necessary for fulfilling their own business duties and day-to-day operations.
4. Russel Metals will retain personal information only for the duration that it is needed. Each department has developed guidelines and procedures to be adhered to with respect to the retention and destruction of personal information. These guidelines include minimum and maximum retention periods. If personal information has been used to make a decision about an individual, that information is retained long enough to allow the individual to access the information after the decision has been made.

Once personal information is no longer required, it will be destroyed in a safe and secure manner following the guidelines and procedures developed by the appropriate department. These include establishing dates as to when personal information is no longer required; determining how the personal information is to be destroyed, erased or made anonymous; and establishing standards of care to be used in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information. Provincial, state or federal laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.

5. Russel Metals has developed and implemented appropriate security measures to protect personal information. These security measures include physical safeguards such as locked filing cabinets and technological controls such as requiring the use of passwords, encryption of files and firewalls. Our company maintains personal information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.
  - Access to personal information will be authorized only for the employees and other agents of Russel Metals who require the information to perform their job and to those otherwise authorized by law.
  - Personal information that is stored in computer and network systems is secured by passwords and firewalls. Routers and servers connected to the Internet are protected from virus attacks or “snooping” by sufficient software solutions. Only authorized individuals may access secure systems and databases.

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- Personal information in paper form is retained in locked filing cabinets or secured areas and/or locked desks.
  - When it is necessary to transfer personal information to external sources, Russel Metals ensures that the third parties involved protect and safeguard the information in an appropriate manner.
6. In most instances, Russel Metals will grant individuals access to their personal information upon presentation of a Personal Information Request/Complaint form, which can be obtained on our website or from the Privacy Officer. If an individual finds errors of fact with his/her personal information, please notify the Company as soon as possible to make the appropriate corrections. If Russel Metals denies a request for access to personal information, we will advise the individual in writing of the reason for such a refusal. The individual may then challenge the decision.
7. Russel Metals may collect, use or disclose personal information without the individual's consent under certain circumstances. These situations may include, but are not limited to:
- Russel Metals is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of the contravention of a provincial, state or federal law upon the request of the appropriate authorities.
  - An emergency exists that threatens an individual's life, health, or personal security.
  - The personal information is for in-house statistical study or research.
  - The personal information is already publicly available.
  - Disclosure is required to investigate a breach of contract.

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### **Compliance, Complaints and Inquiries**

Complaints or inquiries relating to Russel Metals' Privacy Policy and requests for access to personal information should be directed to the Privacy Officer as follows:

The Privacy Officer  
 Russel Metals Inc.  
 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

Or by fax to (905) 819-7292

To access or correct personal information or to file a privacy complaint, forward a completed *Personal Information Request/Complaint Form* to the Privacy Officer. This form can be found on the Employee Portal.

All correspondence communicated internally and externally regarding the collection and use of personal information will include details on how to contact the Privacy Officer.

Complaints received by the Privacy Officer will be documented and investigated, indicating the nature of the complaint. If a complaint is found to be justified, the Company will take appropriate actions which may include amending its policies and procedures.

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## PRIVACY POLICY AND PROCEDURES ACKNOWLEDGEMENT

**I acknowledge that I have received and read the Russel Metals “Privacy Policy Statement”. I understand that Russel Metals can collect, use and disclose my personal information in the manner and for the purposes set out below.**

- **Basic information such as date of birth, gender, home address, home telephone number, marital status, education and banking information.**  
This information is used to pay you correctly, provide you with the proper benefits coverage and prepare pension and benefits statements. It may be disclosed to third parties such as group benefits providers, actuarial firms, financial institutions with which Russel Metals does business and document printers.
- **Social Insurance Number/Social Security Number**  
This information is remitted to the government for T4/W1 filing purposes, to actuarial firms for pension purposes and to Russel Metals’ financial institutions for the group RRSP and Value Sharing Plans.
- **Emergency Contact Information**  
This information will only be used to contact someone in case you are involved in an emergency situation.
- **Spousal/Dependent Children/Beneficiary Information**  
This information is used to provide health, dental and/or vision care benefits to your spouse and/or dependent children and to calculate pension benefits. Beneficiary information is collected in case we ever need to pay death benefits from a pension plan, Group RRSP, Life Insurance plan and/or Accidental Death plan. It may be disclosed to third parties such as group benefits providers, actuarial firms, financial institutions with which Russel Metals does business and document printers.

**I have received, read and understand the Russel Metals “Privacy Policy and Procedure Manual for Employees” and understand that my personal information as outlined above may be used for these specified purposes.**

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_

Branch/Department: \_\_\_\_\_

\_\_\_\_\_  
Employee Name (please print)

\_\_\_\_\_  
Employee Signature