



## Privacy Policy Employee

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### The Purpose and Scope of this Policy

The purpose of Russel Metals Inc.'s ("**Russel Metals**", "**we**", "**us**" or "**our company**") employee policy ("**Privacy Policy**" or "**Policy**") is to help employees understand the rules that govern their Personal Information (as defined below) including without limitation the collection, use, disclosure and/or transfer to third persons, and protection of their Personal Information. Personal Information ("**Personal Information**") is any information about an identifiable individual, as may be defined or limited under applicable privacy legislation.

This Policy is applicable to all prospective, existing and former employees of Russel Metals Inc., its subsidiaries, and that are located in Canada and the United States. We are committed to maintaining the accuracy, confidentiality and security of all Personal Information collected and will comply with the privacy legislation of each jurisdiction in which we operate.

### Key Points of this Policy

The key points of this Policy that you should be aware of are:

- Our company collects various types of Personal Information to manage our relationship with you and to operate our business.
- Most of your Personal Information will remain with our company, but some Personal Information will be shared with third party organizations and affiliates, as necessary, to establish and manage the working relationship or as required by applicable laws.
- You have rights over how your Personal Information is used, such as requesting to access your Personal Information, delete your Personal Information, or have your Personal Information corrected. These rights may be limited in some cases.
- You can reach out to our Privacy Officer at any time if you have questions or concerns about your privacy.

### Personal Information We Collect

The Personal Information which Russel Metals collects to manage your recruitment and administer the working relationship includes, but is not limited to:

- a) **Personal Details:** your name, maiden name, date of birth, gender identification, home address, personal email address, personal phone number(s), emergency contact details, marital status, family member information, certain limited health information (as required), tax ID numbers, national ID numbers (SIN/SSN), drivers license, citizenship and immigration status, and copies of identification documents.
- b) **Pre-Employment Details:** curriculum vitae, job title, professional experience, past employment history, education, training, skills, certifications, test results, languages spoken, background check results (only where permitted by local law and subject to any necessary consents), statements from references, and interview notes.
- c) **Employment Details:** hire date, employee ID, payroll number, travel preferences, company vehicle details, personal vehicle details (if required for parking passes), manager, department, benefits, pay grades, employment status, employment category, vacations, leaves of absence, performance history, training records, assessment results, information regarding skills and development, career plans, policy acknowledgments and signoff forms, promotions and demotions, records of disciplinary action, internal investigation records, reports of potential or suspected misconduct, reimbursed education, accident details and investigations, modified duties and accommodation requests, and termination date and reason.
- d) **Financial Information:** salary, incentives, bonuses, benefits, vacation allowances, bank account number and other details, expense records, pension information, beneficiaries' name / date of birth / gender, social insurance numbers, tax deductions, and any other information needed for payment and taxation purposes.
- e) **Computer and Network Information:** company computer and network credentials, emails, instant messages, other electronic communications, firewall logs, system use data, and system access data.
- f) **Photography and Video:** photographs, video recordings and social media information you voluntarily share with us.
- g) **CCTV Recordings:** closed-circuit television recordings outside of and within our offices and facilities. Including vehicle dashcam footage (audio & visual).

The length of the working relationship, individual performance, and the individual's health and fitness are among the factors that will influence the nature and extent of the Personal Information that may be relevant to our working relationship with you.

### **Purposes for Collection of Personal Information**

We only use your Personal Information where applicable law permits or requires it. We may use your Personal Information for the following purposes:

**a) Recruitment**

We process Personal Information in order to find potential candidates, to conduct interviews, determine eligibility for initial employment or engagement, verify references and qualifications, and ultimately hire candidates.

**b) Onboarding**

Once a candidate has been selected, we process Personal Information in order to onboard the candidate.

**c) Timekeeping and Payroll**

We process Personal Information to track employee time worked, to manage leave, and to administer payroll.

**d) Benefits Administration**

We process Personal Information as part of the administration of benefits, as well as providing insurance coverage, retirement funding, and stock benefits.

**e) Development and Performance Management**

We use Personal Information for performance and talent management, succession and career planning, training, career and leadership development, award recognition, diversity metrics, and conducting employee surveys. We also use Personal Information as necessary when handling disciplinary processes.

**f) Offboarding**

We process Personal Information as part of the offboarding process, including to ensure employees are properly compensated, to remove system access, and to conduct exit interviews.

**g) Communications**

We use Personal Information in internal and external communications, including posting information on our websites and hosting events.

**h) Health and Safety**

We process Personal Information to conduct ergonomic assessments, ensure individuals receive medical attention for work injuries, handle workers' compensation claims, and respect any medically required work restrictions.

**i) Facility Access and Security**

We use Personal Information to provide individuals with access to our facilities and parking areas by issuing ID badges or parking permits. We also process Personal Information in the form of CCTV and dashboard recordings.

**j) Administration of Business**

We process Personal Information as part of managing our business, including expense management, business travel, planning, budgeting, calibration, headcount, executing legal instruments, providing system access, managing our IT systems and infrastructure, creating company directories, executing agreements with other entities, and managing our relationships with other entities.

**k) Cybersecurity**

We process Personal Information to protect the security and functionality of our systems and data. This includes user access authentication, managing firewalls, managing antivirus and anti-malware protection, reviewing system access logs, monitoring systems for malicious activity, monitoring employee awareness and behaviour regarding malicious attacks, preventing phishing attempts, identifying, and resolving security breaches, and preventing fraud. We may also access our company computers, emails, instant messages, records, and network information as required to investigate potential security breaches (subject to any legal and privacy requirements).

**l) Promoting Compliance with Our Company Policies and the Law**

We process Personal Information to promote compliance with our codes of conduct, our policies, our procedures, and the law. This includes issuing policies to employees, coordinating training, asking employees to disclose conflicts of interest, receiving employee reports, and conducting investigations and audits. As part of investigations, we may access company computers, emails, instant messages, records and network information (subject to any legal and privacy requirements).

**m) Responding to Lawful Government Requests and Voluntarily Providing Information to the Government**

We use and provide Personal Information in compliance with lawful requests by regulatory, civil, or criminal authorities, including to meet security or law enforcement requirements. We may also voluntarily provide Personal Information to the government or self-regulatory entities to protect our company.

**n) Making and Defending Legal Claims**

We use Personal Information when making or defending against legal claims, such as in labour disputes. We may also use Personal Information in responding to discovery requests in litigation.

We will only use your Personal Information for the purposes we collected it for. If we need to use your Personal Information for an unrelated purpose, we will notify you and, if required by law, seek your consent. We may use your Personal Information without your knowledge or consent where required by applicable law or regulation.

## **Monitoring of IT and Communications Systems**

Russel Metals monitors the access and use of company IT and communications systems, including employee access to the internet through those systems as is reasonably required to protect business interests and meet legal obligations.

The purpose for our company's monitoring of employee use of IT systems, internet and company software include:

- protecting the integrity of our IT and communications systems (including protection against computer viruses, damage to software or hardware, loss of company documents or information, and protecting against excessive internet usage);
- protecting against unauthorized access to or disclosure of company proprietary information, or employee, contractor, or third-party Personal Information in our control;
- monitoring the use of internet access to ensure that use is in accordance with this Policy;
- finding lost messages or data or retrieving messages lost due to computer failure;
- assisting in investigations of alleged wrongdoing or violations of employer policies; and
- complying with any other legal obligations.

Employees should have no expectation of privacy in respect of any information created, transmitted, received, accessed, or stored on Russel Metals' IT and communications systems, including through internet access. Employees should not use Russel Metals' IT and communications systems for any matter that the employee wants to be kept private or confidential from Russel Metals.

## **Collection of Personal Information from Third Parties**

Personal Information is most often obtained from the individual concerned; however, Russel Metals may collect Personal Information from third parties in accordance with applicable laws. We may use a third party to collect and provide Personal Information for the following reasons:

- to perform reference and background checks relating to potential or ongoing employment or engagement when considered reasonable in the performance of the employee's duties;
- from benefit providers and third-party consultants who may perform assessments on employees; and

- from service providers to the extent such third parties are providing services on our company's behalf.

### **Where Personal Information can be Found**

The location within Russel Metals of Personal Information that we collect is reasonably connected to the purposes for which the Personal Information was collected or is being used. For example, as one would expect, Personal Information on employees and applicants for employment is located in the employee's manager and/or human resource department's files (digital and hard copy) as well as on our intranet, and the computers and network of our affiliates and third-party service system, payroll system, retirement plans files, benefits plan files, workers compensation files, resume and job application files, applicant tracking system, recruiting files, accounting and expense files, budget files and personnel files.

### **Disclosure and Sharing of Personal Information**

While most of your Personal Information will remain with Russel Metals, we may transfer and disclose Personal Information to third party affiliates and service providers as necessary to establish and manage the working relationship in accordance with the terms of this Policy or as required by applicable laws. Personal Information processed for the purposes listed below may be transferred to third parties:

- as required to comply with legal or regulatory requirements or otherwise as permitted at law;
- to third party service providers such as payroll processing companies, insurance and benefit providers, and financial institutions;
- to organizations that perform background checks, credit, license and criminal record checks;
- To organizations that provide central budgeting, expense management, planning calibration, auditing, IT systems and IT infrastructure to efficiently manage the company;
- to organizations that provide central multi-factor authentication support, spam and virus filtering of emails, URL and firewall filtering, investigating cybersecurity incidents and monitoring employee awareness and behaviour regarding malicious attacks;
- to organizations that manage our company compliance program (communications, training, auditing and investigations) relating to anti-corruption, trade sanctions, money laundering, antitrust / fair competition, conflicts of interest, and data protection;

- to medical service providers, doctors and third-party administrators for workers' compensation claims;
- to recruiters, social media platforms and career websites;
- to our legal, accounting, or other professional advisors when reasonably necessary for the professional advisors to perform their services for and on behalf of the company and when making or responding to legal claims;
- to a government institution or part of a government institution that has made a request for the information and has identified its lawful authority to collect that information;
- to an investigate body, a government institution or part of a government institution where we have reasonable grounds to believe that the information relates to a breach of an agreement or a contravention of the laws of Canada or the United States, a province / state or a foreign jurisdiction that has been, is being or is about to be committed;
- to a person who needs the information because of an emergency that threatens the life, health or security of an individual;
- to a person where the disclosure is required by law including, but not limited to, in response to a subpoena or warrant or an order made by a court;
- in connection with a sale of certain assets, or a merger, amalgamation, investment or other significant corporate reorganization involving our company;
- to other individuals, organizations or associations as necessary in furtherance of the interests of employees; and
- as otherwise required or permitted at law.

For a complete list of third parties that may receive Employee Personal Information see Appendix 1.

In the case of a transfer of Personal Information to affiliates or third party service providers that process or store the Personal Information on Russel Metal's behalf, we require that such affiliates and/or third parties have agreed in writing to safeguard the Personal Information, use the information only for the purpose for which it has been provided, will not retain the Personal Information after the expiry of the agreement and allow us to audit the operations to ensure compliance with their obligations and the law.

Russel Metal's third-party affiliates and service providers may access, store and otherwise process Personal Information in other jurisdictions outside of Canada or the United States for purposes consistent with this Policy. Any Personal Information that is used, stored or accessed in jurisdictions outside of Canada or the United States may be

subject to the laws of those countries including that such Personal Information may be disclosed in response to valid demands or requests from government authorities, courts or law enforcement officials in those jurisdictions.

### **Protecting Collected Personal Information**

Russel Metals takes care to ensure that Personal Information is accessed internally only by individuals that require access to perform their tasks and duties. Any employee found accessing Personal Information inappropriately may be subject to disciplinary actions up to and including termination of employment or contract, as applicable. We will not use or disclose any collected Personal Information outside of the purposes described in this Policy unless you have otherwise consented, or it is required or permitted by law.

The privacy of all Personal Information kept by Russel Metals, as outlined above, is protected through various methods such as:

- a) **Technological measures:** the use of passwords, encryption, firewalls and anonymizing software.
- b) **Physical measures:** locked filing cabinets and restricted access to offices and facilities.
- c) **Organizational measures:** security clearances and limiting access on a need-to-know basis and staffing training.

Russel Metals protects the Personal Information of employees disclosed to third parties by undertaking due diligence on such third parties, ensuring that the third parties have in place privacy policies and practices regarding the use and disclosure of Personal Information which comply with applicable privacy laws and regulations and by using contractual agreements stipulating the confidentiality of the Personal Information, the limited purposes for which the third party may use and/or disclose the Personal Information as well as security obligations surrounding the Personal Information. We require third party data processors to implement adequate technical and organizational measures to protect Personal Information and to notify us of a potential data breach.

### **Rights Over Personal Information**

By law, employees have rights over how their Personal Information is used by Russel Metals, including the right to request access to and to correct the Personal Information that we hold about you, or withdraw your consent to the use of your Personal Information where Russel Metals relies on that consent to process their Personal Information.

### ***Exercising Rights***

Individuals may exercise their rights by contacting our Privacy Officer at the contact information noted below. The Privacy Officer will provide written response to the request no later than thirty (30) days from the date of receipt of the request or as otherwise required by law.



### ***Limitation of Rights***

These rights may be limited, for example, if during the fulfillment of the individual's request, information about another individual would be disclosed, or if the individual has asked our company to delete Personal Information that we are legally required to store or need to operate our business. Rights may also be limited by legal privileges and protections.

If consent is required to process certain Personal Information and an individual revokes their consent or refuses to give consent, Russel Metals will be unable to process their Personal Information for that specific purpose. The revocation of consent will apply to all processing after the date of revocation, but not to processing that occurred prior to that date.

### ***Correction of Personal Information***

Russel Metals keeps Personal Information as accurate, complete and up to date as is reasonably necessary in order to make work-related decisions effectively. Employees need to notify Russel Metals when information in their file is not or no longer accurate. Requests for correction of Personal Information or updates to Personal Information are to be directed to our Privacy Officer.

### ***Retention of Personal Information***

Russel Metals will keep an employee's Personal Information only for as long as it is required to fulfill the purpose for which it was collected, and such other period of time to reasonably respond to legal inquiries or comply with applicable law. Once the purpose of a file containing Personal Information is completed and unless it is required or permitted by law to retain the Personal Information, the file will be destroyed with care, in order to prevent unauthorized parties from gaining access to the Personal Information. Data retention of information in cloud-based applications may be as per the vendor's data retention policies.

### ***Challenging Compliance***

Individuals may challenge or complain about the handling of their Personal Information or this Policy and Russel Metals' practices relating to this Policy by contacting our Privacy Officer in writing. Individuals also have the right to make a complaint with the relevant data protection authority in their region.

### **Application and Interpretation of Policy**

It is the policy of Russel Metals to follow all applicable provincial and federal legislative requirements. This Policy is not intended to conflict with any such legislative requirements. Any portion of this Policy which does not conform to applicable federal or provincial legislation will be deemed overridden by that legislation.

## **Changes to Policy**

As with any company policy, as our business evolves and new processes are implemented or changed, we may need to update this Policy. Russel Metals reserves the right to add, delete, modify, change, or discontinue this Policy at any time. Russel Metals will provide notice to employees for any substantive changes to this Policy. We encourage employees to revisit this Policy to refresh their memory on its terms and review any changes made thereto.

## **Addressing Inquiries and Concerns**

Russel Metals' Privacy Officer is responsible for the implementation of this Policy and monitoring our adherence to its terms and all applicable laws. The Privacy Officer also handles questions and concerns about our Policy, as well as Personal Information requests and complaints.

The Privacy Officer may be contacted at:

Privacy Officer, Russel Metals Inc.  
6600 Financial Drive  
Mississauga, ON  
L5N 7J6  
(905) 819-7357  
[pofficer@russelmetals.com](mailto:pofficer@russelmetals.com)

# Appendix 1

<b>Name of Third Party</b>	<b>Purpose</b>
Blue Cross Blue Shield	Benefits USA
CHUBB	Benefits Canada
CIBC Mellon	Pensions Canada
Course Capital	Compensation Canada
Deloitte	Pension & Benefits Canada
Delta Dental	Benefits USA
DLGL	HR System
Driver Check	Drug Testing Canada
Fidelity	401K USA
Greenshield	Benefits Canada
Human Capital Benefits	Benefits Canada
Industrial Alliance	Benefits Canada
Manulife	Benefits Canada
Morgan Stanley	VSP USA
Normandin Beaudry	Compensation Canada
Organizational Solutions (OSI)	Benefits Canada
RBC	Benefits Canada
SunLife	Pension and VSP Canada
Telus Health (formerly Medisys)	Benefits Canada
UKG	HR System
United Health Care	Benefits USA
VSP Vision	Benefits USA
Willis Tower Watson	Pensions Canada

# Schedule A

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## Acknowledgement of Receipt and Consent Employee Privacy Policy

I, the undersigned, \_\_\_\_\_, recognize that I have received a copy of Russel Metals Inc.'s Employee Privacy Policy (the "**Policy**"). I recognize that by signing this document, I confirm that I have read and understood the Policy and consent to the collection, use and disclosure of my Personal Information (as defined in the Policy) in accordance with the Policy.

Employee Signature:

\_\_\_\_\_

Name (printed):

\_\_\_\_\_

Date:

\_\_\_\_\_