



Privacy Policy

External Stakeholder & Customer

Our Privacy Policy

We value the trust that you have placed in Russel Metals Inc. ("**Russel Metals**", "**we**", "**our**", or "**us**") and protecting your personal information is our priority. This Privacy Policy ("**Policy**") discloses the practices of Russel Metals, including its subsidiaries and affiliates, regarding the collection, use, safeguard, disclosure, transfer, access, disposal and other processing (collectively, "**Processing**") of personal information of individuals who engage with Russel Metals for our support, services or otherwise, or visits our website(s) ("**Website**") or contributes to Russel Metals' social media platforms. For the purposes of this Policy, personal information ("**Personal Information**") shall mean information that can identify an individual directly or indirectly through reasonably available information but does not include information that is used solely for the purpose of communicating or facilitating communication with an individual in relation to their employment, business, or profession.

This Policy is Russel Metals' way of making sure you are fully informed of Russel Metals' Personal Information handling practices and policies relating thereto.

Effective Date

This Policy is effective as of the date "Last Update", above, and will remain in effect except with respect to any of its provisions that are changed in the future. We reserve the right to change this Policy at any time. Changes, modifications, additions, or deletions will be effective immediately upon their posting to the Website or upon you being otherwise notified. Your continued use of the Website after we post any such modifications will constitute your acknowledgement of the modified Policy and your agreement to abide and be bound by the modified Policy. We will also revise the "Last Updated" date found at the beginning of this Policy when we post changes to it.

Right to Withdraw Consent

Subject to certain legal and contractual limitations, you have the right to withdraw your consent from us Processing your Personal Information. This may limit our ability to provide you with our services, act on your behalf or engage with you as you would like. To withdraw your consent to certain Processing by Russel Metals, you may declare to the Privacy Officer (contact information provided below) in writing, at any time, of your desire to withdraw consent. Russel Metals will inform you of the implications of such withdrawal within thirty (30) days of your written request. Any withdrawal of consent will apply

thereafter and not to information handling practices that have been previously undertaken based on prior consent.

Age of Consent

Russel Metals will not knowingly obtain consent from those individuals who are minors, seriously ill, or mentally incapacitated and we shall therefore obtain consent from a parent, legal guardian or person having power of attorney of such an individual.

If you are an individual under the age of majority, you must access or use the Website only with the permission and involvement of your parent or guardian.

Collection and Processing of your Personal Information

Types of Personal Information Collected and Processed

The Personal Information which Russel Metals may collect includes, but is not limited to:

1. Contact and identifying information including your name, mailing and local address, email address, telephone number, fax number, social insurance number, drivers license, date of birth, credit history, country of residence and gender.
2. Transaction information including details of commercial or other transactions, such as the purchase of products or services, donations, sponsorship, purchasing history and tendencies.
3. Payment information including your credit card details, bank account information and payment or other information required when you make a purchase or pay for services.
4. User information including messages and images uploaded / shared as part of a public forum, message boards and user chats.
5. Marketing and communications information including your preferences in receiving marketing from us and third parties and your communication preferences.
6. For visitors using company Wi-Fi, the following may be collected: Internet or other electronic network activity including browsing, session, interaction, search history, duration of use, frequency of use, material and pages viewed, time and date of access, number of bytes transferred, number of clicks per visit and other user behaviour related to our website.
7. Other information which you voluntarily provide to us, our employees, or our contractors.

In addition, if you contact us, we may keep a record of your communication to help solve any issues you might be facing.

Purposes for Collection and Processing of Personal Information

Personal Information may be collected by Russel Metals for purposes that include, but are not limited to:

1. Accessing and using our services and the Website.
2. Maintaining and improving our products and services and otherwise running and managing our business in the ordinary course, and keeping our records up to date.
3. Fulfilling orders you have placed with us for the purchase of products, goods, services, accessing and using services and the Website.
4. Receiving communications from us in regard to e-news, emails, bulletins, notifications, newsletters, programs, events and activities.
5. Assisting you when you contact our customer support services, including to direct your questions to appropriate individuals, investigate and address any of your concerns and to improve and monitor our customer support responses.
6. Administering and protecting our business and Website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data.
7. Requesting quotes.
8. Marketing and advertising to be presented on the Website.
9. Administering surveys, contests, draws, raffles, offer tailored content, and other promotional materials to you based on your interests.
10. Using data for business development and market research to understand demographics, interests, usage patterns, and other characteristics of individuals and to track and analyze trends and patterns.
11. Complying generally with all laws and applicable statutory requirements.

Methods of Collection of Personal Information

a) General

Personal Information may be collected by Russel Metals in a number of ways, including in person, our website, by mail, by email, from our application forms and from third parties whom you have authorized to disclose Personal Information to us.

If you provide information about a third-party or authorize a third-party to do so, we will assume you have taken proper measures to obtain informed consent.

b) Phone Calls

For the purpose of maintaining quality service, telephone calls to Russel Metals' customer service lines may be recorded. If your call is subject to a quality assurance program, you will be advised prior to speaking to a representative.

c) Cookies and Web Beacons

Russel Metals may collect Personal Information through cookies on our Website. Cookies are small text files inside your computer that contain a unique identifier, allowing us to recognize you when you visit our Website again. This helps us to understand your preferences based on previous or current Website activity, allowing us to provide you with improved services, tailor or content to meet your needs and for advertising purposes. We also use cookies and navigational data to gather information regarding the date and time of your visit and the information for which you searched and viewed, or on which of the advertisements displayed on our Website you clicked.

Some cookies are automatically deactivated upon your access and use of the Website. However, unless you activate cookies, you may be unable to fully utilize and access all areas and features of the Website. You may activate cookies by visiting our Website and clicking "Activate Cookies". Some third-party service providers may also place their own cookies on your browser. Note that this Policy only covers Russel Metals' use of cookies and does not include use of cookies by such third parties.

d) Clickstream Data

When you visit the Russel Metals Website, we may also collect clickstream data (e.g. server address, domain name, device type, browsing software) which may be stored on the Website's server. This information can be combined with information you have provided to us which will enable us to analyze and better customize your visits. We may use clickstream data for traffic analysis or e-commerce analysis of the Website, to determine which features of the Website are most or least effective or useful to you.

e) Mobile and Location Information

Russel Metals' Website features may be accessible from web-enabled mobile devices. The intent is to provide screens that are optimized for the size of the screen and operating systems. On some devices, functionality may be limited. If you use mobile-enabled services provided by our Website, we may receive information about you from your mobile device. This may also include information about your precise location if you have enabled location-based services on your mobile device. Some devices may allow you to opt-out of this collection or access, and in those cases, you may be able to subsequently stop the collection or access. Please review your device settings for more information.

f) Social Media

If you post a review, make a comment, or otherwise submit Personal Information on a public forum such as social media accounts or public forums on our Website or other applications, your communications may be viewable by the public. When voluntarily disclosing Personal Information about yourself with other Russel Metals users, we are unable to control what may be done with that content. You should take all necessary precautions to protect your private information by not posting or publishing any information that you do not want in the public domain. While we strive to provide the highest level of confidentiality, you should review your personal privacy settings to further restrict any or all parts of your profile or other certain content or information.

g) Other

Russel Metals may collect Personal Information when you interact with our Website, including when you access the Website, purchase goods or services, sign up to receive newsletters and information, fill out online surveys or forms, send or respond to our emails, or otherwise communicate with us.

Sharing of Personal Information with Third Parties

Although you are entering into an agreement to disclose your Personal Information to Russel Metals pursuant to this Policy, we may delegate our authority for Processing of your Personal Information to third-party individuals and organizations who assist us with providing our services and administering our business, and for such other purposes as set forth below, including:

1. Suppliers, agents, contractors and affiliates, including companies we use for storage, processing and delivery of services.
2. Administrative and technical support, including cloud storage providers, IT support, and data analytics providers.
3. Public media and marketing, including companies we use for advertising, marketing, public relations and press releases.
4. Collection agencies in connection with the collection and/or recovery of past due amounts.
5. Parties in connection with proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of our business or assets.
6. We do not store your payment information for online purchases with debit / credit cards, this is shared directly with our third-party payment providers including financial institutions and payment processors.

Refer to appendix 1 for list of third-party sub processors and contractors to Process your Personal Information.

We may also disclose Personal Information in situations where we are legally required or permitted to do so. These situations may include criminal investigations, government tax reporting requirements, court orders, or instances where we believe the rights and safety of others may be at risk.

If you believe that a third-party has inappropriately disclosed your Personal Information to us, please contact that third-party directly. If the third-party does not sufficiently respond to your inquiries, please let us know immediately.

Managing Your Personal Information

Limiting the Collection and Processing of Personal Information

Russel Metals takes care to ensure that Personal Information you provide to us is accessed internally only by individuals that require access to perform their tasks and duties, and externally only by service providers with a legitimate purpose for accessing it. 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.

We do not sell, trade, rent or otherwise share for marketing purposes the Personal Information that we collect with third parties, unless you consent or authorize us to do so. We limit the Personal Information provided to the aforementioned affiliate and third-party service providers to the extent necessary for them to provide the services. We do not allow these third-party service providers to use your Personal Information for their own purposes and only permit them to access and process your Personal Information for specified purposes and in accordance with our instructions. Such service providers are required by contract to safeguard any Personal Information disclosed or transferred by us.

Accuracy of Personal Information

Russel Metals takes all reasonable steps to keep your Personal Information as accurate, complete and up-to-date as necessary to fulfill the purpose for which your Personal Information has been collected. If desired, you may verify the accuracy and completeness of your Personal Information in our records with our Privacy Officer.

Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-to-date Personal Information in your file, we will remedy any such errors on a timely basis. You may request correction of the Personal Information we hold about you, though we may need to verify the accuracy of the new information you provide to us. If inaccurate Personal Information is mistakenly sent to a third-party, we will communicate relevant changes to the third-party where appropriate.

Making Changes to Your Account

You can review and request removal of Personal Information that Russel Metals holds if it is not legally required to be held. If you wish to have us delete all data about you held on our servers, contact us and we can assist with this. Contact information can be found at the end of this Policy document.

Retention of Personal Information

Russel Metals will store your Personal Information only for as long as is reasonably necessary to fulfill the purpose for which the Personal Information was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Once your Personal Information is no longer needed, we will securely and effectively dispose of it.

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

In some circumstances we may anonymize your Personal Information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this anonymized information indefinitely without further notice to you.

Request for Access to Personal Information and Processing

You may request access to your Personal Information, which enables you to receive a copy of the Personal Information we have collected from you and information about how we are Processing it. We may need to request specific information from you to help us confirm your identity and right to access your Personal Information. This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. Russel Metals may not always be able to comply with your request for access to Personal Information for specific reasons which you will be notified of, if applicable, at the time of your request.

Request for Deletion or Removal of Personal Information

In some circumstances you have the right to request that we delete or remove your Personal Information where there is no good reason for us to continue Processing it. You may also ask us to delete or remove your Personal Information where you have successfully exercised your right to object to Processing, where we may have processed your information unlawfully or where we are required by law to erase your Personal Information. We may not always be able to comply with your request for deletion of Personal Information for specific legal reasons which you will be notified of, in writing, within thirty (30) days of the time of your request.

Request for Transfer of Personal Information

You may request the transfer of your Personal Information to a third-party. Russel Metals will provide your Personal Information to the third-party you have chosen in a structured, commonly used, machine-readable format. This request may only apply to automated information which you initially provided consent for us to use or where we used the Personal Information to perform a contract with you.

Protecting Your Personal Information

Integrity and Security

Russel Metals uses industry standard measures, including administrative, organizational, technical, and physical safeguards, to help protect Personal Information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. We implement measures and processes to help us keep your Personal Information secure and to maintain its quality, such as (i) keeping electronic files in a secured environment with restricted access and use, (ii) locking filing cabinets and restricting access to filing cabinets in our offices, (iii) applying security clearance requirements to certain information; and (iv) employing password protection and encryption. We regularly review our security and related policies to adapt the technology as new threats evolve and monitor our systems to help ensure the highest level of availability. If you have any questions about the security of our Website, you can reach out to our Privacy Officer.

Access to private, sensitive and confidential information, including Personal Information, is restricted to authorized employees or contractors with legitimate business reasons. Russel Metals' employees and contractors understand the importance of keeping your Personal Information private. All employees and contractors are expected to maintain the confidentiality of Personal Information.

Risks

Despite the foregoing security measures and significant steps Russel Metals has taken to protect your Personal Information, no company can fully eliminate all security risks associated with the Processing of Personal Information. With that in mind, we cannot guarantee the security of any Personal Information provided to or received by us. We encourage you to provide only the Personal Information you are comfortable with providing to a third-party, keep watch for communications that are suspicious, and report any suspicious activity to us as soon as possible.

In the event there has been a breach of our security safeguards which involve your Personal Information, including the unauthorized access, use or disclosure of your Personal Information, loss of your Personal Information, or other breach, and where there is a risk that significant harm will come to you as a result of that breach, Russel Metals will notify you of the breach and report the breach to the Privacy Commissioner.

Website and Applications Governed by this Policy

Our Website or third-party platforms are governed by the provisions and practices stated in this Policy. Our Website and such applications may contain links to third-party sites or applications that are not governed by this Policy. Although we endeavour to only link to sites or applications that share our commitment to your privacy, please be aware that this Policy will no longer apply once you leave our Website or such applications, and that we are not responsible for the privacy practices of third-party sites or applications. We therefore suggest that you closely examine the respective privacy policies of third-party sites and applications to learn how they collect, use and disclose your Personal Information.

Governing Law

This Policy and all related matters shall be interpreted and construed in accordance with the laws of the Province of Ontario and the applicable federal laws of Canada.

Personal Information Outside of Canada

Personal Information provided to our service providers may be stored outside of Canada. You acknowledge and agree that, as a result, your Personal Information may be processed, used, stored or accessed in other jurisdictions and may be subject to the laws of those jurisdictions. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement in other countries. If you are an individual resident in the province of Quebec, please note that your Personal Information may be transferred outside of the province.

Addressing Your Inquiries or Concerns

Your privacy is very important to us. We are happy to provide you with a copy of this Policy and to discuss any of its contents with you.

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 access 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

Appendix 1

Name of Third Party	Purpose
Moneris	Payment processing
Mailchimp	Marketing communications
Equifax	Credit reporting
Dun & Brad Street	Credit reporting
Intact Insurance	Credit reporting
EDC	Credit Insurance
CRM	Credit Risk Monitoring