

Varco Pruden Buildings Privacy Notice for California Residents

Last Modified: December 31, 2019

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1. Introduction

This Privacy Notice for California Residents supplements the information contained in BlueScope Buildings North America's general privacy notice available at <https://www.vp.com/privacy-statement> and applies solely to Website visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this Notice.

If you have a disability that limits your ability to access this Privacy Notice, please contact us at privacy@bluescope.us to receive information on alternative formats.

2. Information We Collect, From Whom We Collect It, How/Why We Use It, and With Whom We Share It

Our Website collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). We collect and use personal information for business purposes. The following table sets forth the categories of personal information the Website has collected from consumers within the last 12 months, along with the business or commercial purpose for collection and use, the categories of sources for the personal information, and the categories of third parties with whom we share personal information:

Category	Examples	Business or Commercial Purpose for Which It Will Be Used	Categories of Sources from Which the Information Was Collected	Categories of Third Parties with Whom the Personal Information Is Shared
Identifiers.	Identifiers such as a real name, alias, postal address, unique personal identifier,	<ul style="list-style-type: none">Presenting our Website and its contents to you.	<ul style="list-style-type: none">Directly from you (e.g., by filling in a webform).	<ul style="list-style-type: none">Service providers.

	<p>online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers</p>	<ul style="list-style-type: none"> • Providing the information, goods, and services you've requested or agreed to receive. For example, customer service and order fulfillment. • Processing your account and online payment registration, including determining your eligibility for an account and online payment registration. • Processing your online payment. • Improving and managing the Website, including analytics services. • Informing you about new features of the Website. • Marketing our products and services to you and sending you marketing materials that may be of interest to you. 	<ul style="list-style-type: none"> • Automatically as you interact with the Website. • From third parties, including analytics providers. • From social media platforms linked from the Website if you "Like," "Follow," or otherwise interact with our page or profile on that platform. 	
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		<ul style="list-style-type: none"> • Reviewing your application for employment. • Complying with legal or administrative obligations. • Engaging in a transaction (e.g., merger, acquisition) or bankruptcy (or similar) proceeding. • For any other purpose disclosed by us when you provide the information. 		
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, address, telephone number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.	<ul style="list-style-type: none"> • Same as above. 	<ul style="list-style-type: none"> • Directly from you. 	<ul style="list-style-type: none"> • Service providers.
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • Providing the information, goods, and services you've requested or agreed to receive. • Processing your account and online payment registration, 	<ul style="list-style-type: none"> • Directly from you. • From third parties, including analytics providers. 	<ul style="list-style-type: none"> • Service providers.

		<p>including determining your eligibility for an account and online payment registration.</p> <ul style="list-style-type: none"> • Processing your online payment. • Carrying out our obligations and enforcing our rights arising from any contracts entered into between you and us, including for billing and collection. • Marketing our products and services to you and sending you marketing materials that may be of interest to you. • For any other purpose disclosed by us when you provide the information. 		
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	<ul style="list-style-type: none"> • Presenting our Website and its contents to you. • Enabling you to interact with Website features and improving the Website's 	<ul style="list-style-type: none"> • Automatically as you interact with the Website. • From third parties, including analytics providers. 	<ul style="list-style-type: none"> • Service providers.

		performance when you return to the Website. <ul style="list-style-type: none"> Improving and managing the Website. 		
Geolocation data.	Physical location or movements.	<ul style="list-style-type: none"> Improving and managing the Website. 	<ul style="list-style-type: none"> Directly from you. Automatically as you interact with the Website. From third parties, including analytics providers. 	<ul style="list-style-type: none"> Service providers.
Professional or employment-related information.	Current or past job history or performance evaluations.	<ul style="list-style-type: none"> Reviewing your application for employment. 	<ul style="list-style-type: none"> Directly from you. 	<ul style="list-style-type: none"> Service providers.

Personal information does not include:

- Publicly available information from government records;
- Deidentified or aggregated consumer information; or
- Information excluded from the CCPA's scope, such as:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 and the California Confidentiality of Medical Information Act or clinical trial data; or
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act or California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994.

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

3. Sharing Personal Information

As noted in the above table, we may disclose your personal information to third parties for a business purpose. When appropriate, we enter into contracts with third parties that describe the purpose of the disclosure and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

Disclosures of Personal Information for a Business Purpose

In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Commercial information.
- Internet or other similar network activity.
- Geolocation data.
- Professional or employment-related information.

Sales of Personal Information

In the preceding 12 months, we have not sold personal information. Except in the case of transactions or bankruptcy proceedings (as described more fully in our <https://www.vp.com/privacy-statement> we will not sell your personal information without providing you with an opportunity to opt-out of such sales.

4. Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise them.

Access to Specific Information and Data Portability Rights

You have the right to request certain information about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (the process for submitting "verifiable consumer requests" is addressed below), we will—to the extent possible and permitted by law—disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.

- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete—and direct our service providers to delete—your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good, service, or information that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 901-748-8000
- Submitting a request through the following webform: <https://bluescopebuildings.com/contact-us/>
- Email: privacy@bluescope.us

Making a verifiable consumer request does not require you to create an account with us. We do, however, consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information – and you may make a verifiable consumer request for access or data portability only twice within a 12-month period.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. To verify your identity or authority, we will use information from your online account – such as account number and email address.

Regardless of how you submit your request, we will use personal information provided in a verifiable consumer request only to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will use reasonable efforts to initially respond to a verifiable consumer request within 10 days of its receipt – with a substantive response within 45 days of receipt. If we require more time (not to exceed 90 days from receipt), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period before the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will provide

your personal information in a format that is commercially reasonable and should allow you to transmit the information to another entity.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

5. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may, however, offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value to us and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

6. Changes to This Privacy Notice

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will post the updated Notice on the Website and update the notice's "Last Modified" date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

7. Contact Information

If you have any questions or comments about this Notice, the ways in which we collect and use your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please contact us at:

Phone: 901-748-8000

Email: privacy@bluescope.us

Postal Address:

Varco Pruden Buildings

Attn: Legal Department

3200 Players Circle

Memphis, TN 38125