

## California Privacy Notice

### McWane, Inc.

**Last Modified:** October 1, 2020

This California Privacy Notice (this "Policy") is for California residents. As required in the California Consumer Privacy Act of 2018 (the "CCPA"), this Policy describes the rights available to California consumers (defined as California residents) regarding their personal information, and our practices regarding the collection, use, disclosure, and sale of personal information. In this Policy, "Company," "we," "us" and "our" refers collectively to McWane, Inc. and its divisions and subsidiaries.

"Personal Information" for the purposes of this Policy is defined as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is aggregated or information that cannot be reasonably linked to you. Pursuant to the CCPA, personal information does not include the following:

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

### Your Rights as A California Resident

- **Right to Know and Access:** This is your right to submit a verifiable request for information regarding the: (1) categories of personal information collected or disclosed by the Company; (2) purposes for which categories of personal information are collected by the Company; (3) categories of sources from which the Company collects personal information; and (4) specific pieces of personal information the Company has collected about you during the past twelve months. This right is subject to certain limitations under the CCPA;

- **Right to Delete:** This is your right to request that we delete the personal information we have collected from you and maintain in our systems, subject to certain exceptions that permit us to keep your personal information for specific purposes;
- **Right to Opt-Out of Sale:** This right allows you to opt-out of the sale of your personal information to third parties; and
- **Right to Non-Discrimination:** This right means that the Company will not discriminate against you in any manner because you elect to exercise any of your rights under the CCPA.

### **Categories of Personal Information We Collect under the CCPA**

In the last twelve (12) months, the Company has collected the following not all-inclusive categories and examples of personal information, as defined in the CCPA, about California consumers:

- Personal identifiers (e.g., real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers);
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) (e.g., name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information);
- Protected classification characteristics under California or federal law (e.g., age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information));
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Biometric information (e.g., genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as temperature, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data);

- Internet or other similar network activity (e.g., browsing history, search history, information on a consumer's interaction with a website, application, or advertisement);
- Geolocation data (e.g., physical location or movements); and
- Inferences drawn from other personal information (e.g., profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes).

### **Sources from Whom We Collect Personal Information under the CCPA**

We collect personal information about you from a variety of sources in order to provide you with our products and services, communicate with you, and when you interact with us through person-to-person customer service and sales channels or other electronic means, such as our call centers and/or Company in-person locations, or use our products, services, websites and applications. These sources include:

- Information you provide to us directly, such as when you contact or communicate with us, or when you establish a customer or user account;
- Information we collect automatically and through your use of our products, services, websites and applications;
- Information obtained from third parties; and
- Publicly available information about you.

### **How We Use the Categories of Personal Information We Collect under the CCPA**

We use the personal information we collect about you to provide you with reliable, high quality products and services, communicate with you, make improvements to our products and services, investigate theft, fraud and other illegal activities, and to personalize your experience. We may use the information we collect about consumers, and the circumstances under which we may share or disclose that information may include to:

- provide, deliver, maintain and improve the products and services you request, interact with, and to which you may subscribe;
- fulfill requests for new services or changes to your account or the products and services you already receive;
- provide you with technical support and high-quality customer service;
- create and administer a Company account, including activating your service, billing, invoicing, and debt collection activities;
- authenticate or otherwise provide you access to Company products and services;

- provide updates, upgrades, repairs or replacements for any of our service-related devices or software used in providing or receiving services;
- manage and configure our device(s), system(s) and network(s);
- understand how the service is being used, including through the creation of operational and marketing reports based on deidentified and/or aggregated service usage information;
- inform you of additional products and services that may be of interest to you;
- protect the security of the system, prevent fraud, detect unauthorized reception, use, and abuse of any Company product, service, website or application, and to enforce any Company policy or applicable terms of service;
- protect our rights, our personnel, our property, and the safety of others, including, without limitation, reducing the risk of viruses and other illnesses in the workplace and to permit contact tracing;
- maintain our accounting, tax and other records;
- comply with applicable federal and state laws and regulations, as well as for the general administration of our business;
- deliver and personalize communications with you;
- create internal business and marketing reports; and
- provide advertising and marketing subject to the applicable consent.

### **How You Can Submit A Verifiable Consumer Request for Access to and/or Deletion of Your Personal Information**

To protect your information, we may need to verify your identity before processing your request. In some cases we may need to collect additional information to verify your identity, such as a government issued ID.

Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. We will use reasonable efforts to verify your identity, as well as the identity of your authorized agent to ensure that your agent has been properly authorized by you to request information on your behalf.

If we cannot verify your identity or your authorized agent's identity, we cannot fulfill your request.

To exercise one or more of your CCPA rights, please submit a verifiable consumer request:

- By emailing us at [CCPArequests@mcwane.com](mailto:CCPArequests@mcwane.com) or
- By calling us at 205-578-3809.

### **How You Can Opt-Out of the Sale of Personal Information to Third Parties**

The CCPA gives California consumers the right to opt-out of the sale of their personal information to third parties. We do not sell your personal information to third parties for monetary consideration for any purpose, including advertising, but the Company may disclose or make available the personal information identified earlier in this Policy for limited reasons. To opt-out of the sale of your personal information, please contact us:

- By emailing us at [CCPArequests@mcwane.com](mailto:CCPArequests@mcwane.com) or
- By calling us at 205-578-3809.

### **Your Right to Non-Discrimination**

The CCPA prohibits businesses from discriminating against California consumers for exercising any of their rights under the CCPA. We will not discriminate against you for exercising any of these rights.

### **How we Protect Children's Privacy**

We do not knowingly collect personal information from anyone under the age of 16.

### **Changes to This Policy**

We reserve the right to change this Policy from time to time. If we make any changes that materially affect your rights or the ways in which we collect, use or disclose your personal information, we will notify you in advance through written, electronic or other means, as permitted by law. The date this Policy was last modified is listed at the top of this Policy.

### **Contact Information**

To exercise your rights under the CCPA, or if you have any questions, comments, or concerns about this Policy, please contact Ashley Wright, Assistant Vice President and Legal Counsel, at: 205-578-3809 and [CCPArequests@mcwane.com](mailto:CCPArequests@mcwane.com).