# U.S. State Privacy Notice and Disclosure of Consumer Rights

This U.S. State Privacy Notice applies to "Consumers" as defined under privacy laws in **California**, **Colorado, Connecticut** and **Virginia**, including the California Consumer Privacy Act (California Civil Code § 1798.100 et seq.), as amended including, without limitation, by the California Privacy Rights Act (the "CCPA"); the Colorado Privacy Act (Colorado Revised Statute Title 6 Article 1 Part 13 § 6-1-1301 et seq.) ("CPA"); Connecticut's Act Concerning Personal Data Privacy and Online Monitoring (Public Act No. 22-15); and the Virginia Consumer Data Privacy Act (collectively, "U.S. State Privacy Laws"). This U.S. State Privacy Notice is a supplement to our Privacy Policy. Capitalized terms used but not defined herein will have the meanings given to them in the Privacy Policy.

This U.S. State Privacy Notice does not apply to data that is collected in a human resources (HR) context. For example, if you are a California resident and an employee, former employee, or job applicant of Ryerson or one of its affiliated or related entities, or if we have collected data from or about you otherwise in a HR context, please see our California Employee Privacy Notice or California Applicant Privacy Notice.

# RYERSON DOES NOT SELL YOUR PERSONAL INFORMATION.

# DATA COLLECTION, USE, AND DISCLOSURES

Generally, we collect, use, and disclose your Data in order to provide you services and as otherwise related to the operation of our business, which include both business purposes and commercial purposes described in our Privacy Policy.

The table below describes the categories of Data we collect as well as examples of types of Data that fit within such categories, in the left column. The middle column lists Processing Purposes applicable to each category of Data. The right column states the categories of recipients that receive those specific categories of Data and Sensitive PI as part of disclosures for business purposes, as well as disclosures that may be considered a Sale or Sharing under certain U.S. State Privacy Laws.

| CATEGORY OF PI   | PROCESSING PURPOSES   | CATEGORIES OF RECIPIENTS   |
|--|---|--|
|  | <ul> <li>Providing our products<br/>and services</li> </ul>   |  |
| Identifiers and contact<br>information (such as<br>name, phone number,<br>physical address, email<br>address, mobile<br>identification number,<br>title, affiliated<br>organization, IP<br>address, cookie ID) | <ul> <li>Customizing your<br/>experience, offers,<br/>and content</li> <li>Registering and<br/>administering<br/>accounts</li> <li>Customer service and<br/>communications</li> <li>Research,<br/>development, and<br/>analytics</li> </ul> | <ul> <li>Disclosures for business purposes:</li> <li>Software, communications, storage and other business Vendors ("Business Vendors")</li> <li>Affiliates and related entities</li> </ul> |

• Safety, security, and

| CATEGORY OF PI  | PROCESSING PURPOSES   | CATEGORIES OF RECIPIENTS   |
|---|---|--|
|   | <ul> <li>compliance with legal obligations</li> <li>For purposes disclosed at the time you provide your personal information</li> <li>For purposes that are compatible with the purpose of collecting your personal information and that are not prohibited by law ***********************************</li></ul>  |  |
| Transaction /<br>Commercial<br>Information (such as<br>Ryerson products or<br>services used,<br>purchased, or<br>considered | <ul> <li>Providing our products<br/>and services</li> <li>Customizing your<br/>experience, offers,<br/>and content</li> <li>Registering and<br/>administering<br/>accounts</li> <li>Customer service and<br/>communications</li> <li>Research,<br/>development, and<br/>analytics</li> <li>Safety, security, and<br/>compliance with legal<br/>obligations</li> <li>For purposes disclosed<br/>at the time you<br/>provide your personal<br/>information</li> <li>For purposes that are<br/>compatible with the<br/>purpose of collecting<br/>your personal<br/>information and that<br/>are not prohibited by</li> </ul> | Disclosures for business<br>purposes:<br>Business Vendors<br>Payment processing<br>Vendors<br>Affiliates and related<br>entities |

law

### **CATEGORY OF PI**

#### **PROCESSING PURPOSES**

- Providing our products and services
- Facilitating your relationship with our Third-Party Business Partners
- Customizing your experience, offers, and content
- Registering and administering accounts
- Customer service and communications
- Research, development, and analytics
- Safety, security, and compliance with legal obligations
- For purposes disclosed at the time you provide your personal information
- For purposes that are compatible with the purpose of collecting your personal information and that are not prohibited by law
- Providing our products and services

\*\*\*\*\*\*

- Facilitating your relationship with our Third-Party Business Partners
- Customizing your experience, offers, and content
- Registering and administering accounts

Disclosures for business purposes:

- Business Vendors
- Marketing Vendors
- Affiliates and related entities

Information (such as search, browsing history, and other interactions with the Service)

Service Usage

Location Data (such as where you enable location-based features on your Device, or we may infer your rough location (such as zip code))

### **CATEGORIES OF RECIPIENTS**

Disclosures for business purposes:

- Business Vendors
- Marketing Vendors
- Affiliates and related entities

| CATEGORY OF PI   | PROCESSING PURPOSES  | CATEGORIES OF RECIPIENTS  |
|--|--|---|
|  | <ul> <li>Customer service and<br/>communications</li> </ul>  |   |
|  | <ul> <li>Research,<br/>development, and<br/>analytics</li> </ul>   |   |
|  | <ul> <li>Safety, security, and<br/>compliance with legal<br/>obligations</li> </ul>  |   |
|  | <ul> <li>For purposes disclosed<br/>at the time you<br/>provide your personal<br/>information</li> </ul>   |   |
|  | <ul> <li>For purposes that are<br/>compatible with the<br/>purpose of collecting<br/>your personal<br/>information and that<br/>are not prohibited by<br/>law</li> </ul> |   |
|  | *****  |   |
|  | Sensitive PI   |   |
|  | <ul> <li>Providing our products<br/>and services</li> </ul>  |   |
|  | <ul> <li>Registering and<br/>administering<br/>accounts</li> </ul>   |   |
|  | Customer service and communications  |   |
| Account information<br>and password (we may<br>store your account log- | <ul> <li>Safety, security, and<br/>compliance with legal<br/>obligations</li> </ul>  | Disclosures for business purposes:  |
| in in combination with<br>a password in our<br>systems)                | <ul> <li>For purposes disclosed<br/>at the time you<br/>provide your personal<br/>information</li> </ul>   | <ul> <li>Business Vendors</li> <li>Affiliates and related entities</li> </ul> |
|  | <ul> <li>For purposes that are<br/>compatible with the<br/>purpose of collecting<br/>your personal<br/>information and that</li> </ul>                                   |   |

are not prohibited by

law

We also may disclose each category of PI and Sensitive PI in the table to the following categories of recipients in a manner that does not constitute Sale or Sharing:

- 1. To other parties at your direction or through your intentional action.
- 2. To the government or private parties to comply with law or legal process.
- 3. In connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, in which case we will transfer such information to the buyer or successor entity in any such corporate transaction.
- 4. In addition, our Vendors and the other recipients listed in the above table may, subject to contractual restrictions imposed by us and/or legal obligations, also use and disclose your Data for business purposes. For example, our Vendors and the other categories of recipients listed in the table below may engage subcontractors to enable them to perform services for us or process for our business purposes.

# DATA RETENTION

Because there are so many different types of Data in certain categories, and so many purposes and use cases for different data, we are unable to provide retention ranges based on categories of Data in a way that would be meaningful and transparent to you. Actual retention periods for all Data will depend upon how long we have a legitimate purpose for the retention — consistent with the collection purposes and applicable law. For instance, we may maintain business records for so long as relevant to our business and may have a legal obligation to hold Data for so long as potentially relevant to prospective or actual litigation or government investigation. We apply the same criteria for determining if we have a legitimate purpose for retaining your Data that you ask us to delete. If you make a deletion request, we will conduct a review of your Data to confirm if legitimate ongoing retention purposes exist, will limit the retention to such purposes for so long as the purpose continues, and will respond to you with information on any retention purposes on which we rely for not deleting your Data. For more information on deletion requests see the *Exercising Access, Data Portability, and Deletion Rights* section below.

# ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS -CALIFORNIA RESIDENTS

You have the right to request that Ryerson disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (See *Exercising Access, Data Portability, and Deletion Rights* below), we will 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 that personal information (we do not sell your personal information and our collection purposes are disclosed in our Privacy Policy, found <u>here</u>.
- The categories of third parties with whom we share that personal information (disclosed in our Privacy Policy, found <u>here</u>).
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, the personal information categories that each type of recipient obtained.

### NON-DISCRIMINATION

We will not discriminate against you for exercising any of your state rights. Unless permitted by the U.S. State Privacy Laws, 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.
- Suggest that you may receive a different price or rate for goods or services or a different leve or quality of goods or services.
- However, we may offer you certain financial incentives permitted by the CCP that can result in different prices or rates. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value 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.

### YOUR CONSUMER PRIVACY RIGHTS

#### **Appeal Rights**

Residents of certain states have the right to appeal a decision regarding a privacy request. You can exercise this right by responding to the email we send containing our response to your request and requesting further review. As of the Effective Date, residents of Colorado, Connecticut, and Virginia have this right.

#### **Right to Limit Sensitive PI Processing**

Certain personal information qualifies as sensitive Data or Sensitive PI under the U.S. State Privacy Laws, which we refer to in this U.S. State Privacy Notice as "Sensitive PI." If you are a California resident, you have the right to direct businesses to limit their use and disclosure of Sensitive PI if it is used or disclosed beyond certain internal business purposes. Where applicable, we will treat such a request as a revocation of any consent that you may have provided to your processing of Sensitive PI.

#### **Right to Delete**

You have the right to request that we delete any of your PI that we have collected directly from you, subject to certain exceptions which we will explain if they apply. After we confirm that your deletion request is a Verifiable Consumer Request, subject to permitted retention exceptions, we will carry out one or more of the following: (i) permanently erase your PI on our existing systems with the exception of archived or back-up systems, (ii) deidentify your PI, or (iii) aggregate your PI with other information. In our response to your request to delete, we will tell you the method for deleting your PI. Where legal exceptions will apply to your request for deletion, we will tell you which one(s) and will limit retention to the permitted purpose(s).

### **Right to Correct**

You have the right to request that we correct inaccuracies that you find in your personal information maintained by us. Your request to correct is subject to our verification (discussed above) and the response standards in the applicable U.S. State Privacy Laws.

### Do Not Sell/Share/Target

Under the various U.S. State Privacy Laws, Consumers have the right to opt-out of certain processing activities. California and certain other states have opt-outs specific to Targeted Advertising activities - which California's law refers to as "cross-context behavioral advertising", and others simply as Targeted Advertising - which involve the use of PI from different businesses or services to target advertisements to you. California provides Consumers the right to opt-out of Sharing, which includes providing or making available PI to third parties for such Targeted Advertising activities, while other states provide Consumers the right to opt-out from processing PI for Targeted Advertising more broadly. There are broad and differing concepts of the Sale of PI under the various U.S. State Privacy Laws, all of which at a minimum require providing or otherwise making available PI to a third party. *RYERSON DOES NOT USE CONSUMER DATA FOR TARGETED ADVERTISING ACTIVITIES.* 

# 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 (312) 292-5121
- Emailing us at <u>ryersonprivacypolicy@ryerson.com</u>

Only you, or a person with written authorization to act on your behalf, or, for California residents, a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are (a) the person about whom we collected personal information or (b) an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

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.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided to in a verifiable consumer request to verify the requestor's identity or authority to make the request.