

# BIG RIVER STEEL ONLINE PRIVACY POLICY EFFECTIVE JUNE 1, 2018

This online Privacy Policy applies to information about you that Big River Steel ("Big River") may obtain when you use bigriversteel.com (the "Site"). This Privacy Policy also describes how Big River may collect, use, or share information about you; your choices regarding our use of your information; the ways in which we safeguard the information we collect; and how you may contact Big River regarding our privacy practices.

#### **Information Collection**

We collect information that you provide directly to us, including personal information such as your name and email address. For example, you may submit this type of information to access Tech Resources available on the Site, or to inquire about certain job opportunities listed on the Site's Careers page.

## Information Collected Automatically

In addition to information you submit to us, we may collect certain information using automated means such as cookies, web beacons, and web server logs. The types of information we collect automatically include IP addresses, device identifiers, browser characteristics, operating system details, language preferences, referring URLs, length of visits, and pages viewed. We may combine this automatically-collected information with other information we obtain about you.

#### **Data Analytics**

Big River uses third-party web analytics services on our website, such as Google Analytics. These service providers help us analyze how users use the Site. To learn more about opting out of data collection through Google Analytics, click here: <u>Google Analytics</u>. Your web browser may have settings that allow you to transmit a "Do Not Track" signal when you visit various websites or use online services. Like many websites, this Site is not designed to respond to "Do Not Track" signals received from browsers. To learn more about "Do Not Track" signals, you may wish to visit All About DNT.

Third parties do not collect personally identifiable information about your online activities over time and across different websites when you use this Site.

#### Marketing and Sales Automation Software

Big River uses third-party marketing and sales automation software on our website, such as HubSpot. These service providers use cookies or similar technologies to help us track visitors to this website and gather demographic information. This data is used to deliver customized content and promotions to users whose behavior indicates that they are interested in a particular subject area.

For more information about HubSpot's Privacy Policy, click here.

#### **Information Use**

We may use the information we collect about you for various purposes, including to:

- Personalize and improve your online experience;
- Respond to requests, comments, or questions, and to provide customer support;
- Improve the Site, our marketing efforts, and other products and services we may offer;
- Monitor and analyze trends, usage, and activities of visitors to the Site;
- Contact you regarding your use of the Site or, in our discretion, changes to our policies;
- Prevent fraud or other misuse of the Site;
- Comply with legal requirements, industry standards, and our policies; or
- For any other purpose, with your consent.

In addition, we use information collected online through cookies, web beacons, and other automated means for purposes such as recognizing your computer when you visit the Site, tracking your activity as you navigate the Site, or analyzing your use of the Site. We also may use the information we obtain about you in other ways for which we provide notice at the time of collection.

#### **Information Sharing**

We may permit our agents, vendors, consultants, and other service providers to access information we collect about you through the Site to carry out work on our behalf. These third party service providers are prohibited from using such personal information for any purpose(s) other than to provide the services we have engaged them to perform.

We also may share your information (1) if we are required to do so by law, regulation, or legal process (such as in response to a court order or subpoena); (2) to fulfill requests by government agencies, such as law enforcement authorities; (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity; or (4) to enforce our site policies, or protect ours or others' rights, property, or safety.

We reserve the right to transfer any information we obtain through the Site in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, reorganization, or liquidation).

#### **Information Security**

We maintain appropriate safeguards to help protect personal information collected through the Site from loss, theft, misuse, or other unauthorized access, disclosure, alteration, or destruction. Although Big River uses reasonable efforts to safeguard information, transmission via the Internet is not completely secure and Big River cannot guarantee the security of your information collected through the Site. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contacting Us" section below.

#### **Data Retention**

We store your information for the period necessary to fulfill the purpose outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide services to you (for example, for as long as you have an account with us or keep using the services)
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations)

#### Links to Other Websites

This Site may include links to other websites for your convenience and information. Those websites may be operated by entities not affiliated with Big River, and may have their own privacy policies or notices, which we strongly suggest you review. Big River is not responsible for the content, or use, of any linked websites that are not affiliated with Big River.

#### Children's Privacy

This Site is not intended for, nor targeted to, children under 13, and we do not knowingly or intentionally collect information about children under 13. If we learn that we have received information from a user of the Site who is under the age of 13, we will delete the

information. If you believe that we may have collected information about a child under the age of 13, please contact us at <u>privacy@bigriversteel.com</u> so that we may delete the information.

## Your Choices

You may request that we update, correct, or delete your information collected through the Site by emailing <u>privacy@bigriversteel.com</u>. In some cases, we may need to retain partial information to fulfil our legal responsibilities, or to complete ongoing financial transactions. To help protect your privacy and security, we may take reasonable steps to verify your identity prior to honoring any such requests. Many web browsers provide options to allow you to stop accepting new cookies, or to disable existing cookies. Please be aware that if you disable the cookies on your computer you may not be able to use certain features of this Site or other websites, and disabling cookies may invalidate opt outs that rely on cookies to function.

You may, at any time, request and receive the information that you have provided to us. We will provide you with your information, in a machine-readable format, so that you can make use of it in other contexts, or with other service providers.

You may unsubscribe from receiving promotional emails from us at any time by following the instructions provided in those email communications. Please note that even if you opt out of receiving promotional communications from us, we may continue to send you nonpromotional emails, such as emails concerning our ongoing business relationship with you.

Even if you have previously consented to our Terms of Service and Privacy Policy, you have the right, at any time, to change your mind and object to the collection, use, and processing of your personal information. Additionally, you are under no contractual obligation to continue to provide any information to us. However, we require certain information in order to provide you with our services. Therefore, if you disagree with the terms of this Privacy Policy or our Terms of Service, you should stop using the Big River website and contact us so that we may delete your information.

#### **Special Notice for California Residents**

Customers who reside in California and have provided data to us can request, once per calendar year, information about our sharing of certain categories of data to third parties for their direct marketing purposes. Such requests should be submitted to us at <u>privacy@bigriversteel.com</u> or you may write to us at Big River Steel, 2027 State Hwy 198, Osceola, AR 72370.

We will provide a list of the categories of data disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this section.

### **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this Privacy Policy. We encourage you to review this Privacy Policy whenever you visit the Site to stay informed about our information practices. This policy was last modified on June 1, 2018.

#### How to Contact Us

If you have questions regarding this Privacy Policy, you may contact us at <a href="mailto:privacy@bigriversteel.com">privacy@bigriversteel.com</a>. You also may write to us at Big River Steel, 2027 State Hwy 198, Osceola, AR 72370.