

# Privacy Policy

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This Privacy Policy ("Privacy Policy") describes how PrimeSource Building Products, Inc. and its subsidiaries and affiliates, including each of its proprietary brands (collectively, the "**Company**," "**we**," "**us**," or "**our**"), may collect, use, and share your personal information in connection with the websites and platforms we own and operate that link to this Privacy Policy (each, a "**Website**"), and our related services, events, social media pages, and email and other electronic communications (collectively, and together with the Websites, the "**Services**"), and the choices you have with respect to your personal information. Please note, our privacy practices are subject to the applicable laws of the places in which we operate. You will see additional region-specific terms that only apply to customers located in those geographic regions, or as required by applicable laws.

The Company reserves the right, at any time, to modify this Privacy Policy. If we modify how we collect, use, or share personal information, we will post the updated Privacy Policy on this page. In some cases, we may notify you about an update by sending you an email, posting a notice about the update on the Services, or other means as may be required by applicable law. In all cases, your continued use of the Services following posting or other notification of changes constitutes your acknowledgement of such changes. Please review this Privacy Policy periodically to keep up to date on our most current policies and practices.

This Privacy Policy covers the following topics:

**PERSONAL INFORMATION WE COLLECT**

**HOW WE USE YOUR PERSONAL INFORMATION**

**HOW WE SHARE YOUR PERSONAL INFORMATION**

**INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

**YOUR CHOICES**

**CHILDREN'S PRIVACY**

**SECURITY OF YOUR PERSONAL INFORMATION**

**THIRD PARTY WEBSITES AND SERVICES**

**NOTICE TO CALIFORNIA RESIDENTS**

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**CONTACT US**

**PERSONAL INFORMATION WE COLLECT**

**Personal Information You Provide.** We may collect personal information when you provide it to us, which may include the following categories of personal information. We may also collect other personal information that is not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

- **Contact information**, such as first and last name, email address, phone number, and mailing address.
- **Professional information**, such as company name, job title, company location, and other details we may collect about your business or profession.
- **Account information**, such as your PrimeMarketplace log-in details, information that you store in your account, information you provide during registration submission, and other details about your use of the Services.
- **Payment information**, such as the payment information you provide in your transactions with us, including credit card number, billing address, and other financial account details. This information may be collected by us and our third-party payment processors.
- **Order history**, such as records of products you have purchased from us.
- **Product warranty or rebate information**, such as your name, email address, mailing address, phone number, and details about your purchase or service date.
- **Preferences**, such as any preferences you set in your account and any marketing or communications preferences, and details about how you engage with our communications.
- **Survey responses**, such as the information you provide in response to our surveys, questionnaires, or contests.
- **Communications**, such as the information associated with your requests or inquiries, including for support, assistance, or order information, and any feedback you provide when you communicate with us. We and our service providers may also record or monitor any call or chat you have with us for quality control or training purposes, or to enforce our rights.

**Personal Information from Third Parties.** We may receive personal information from third parties, such as our dealers, service providers, advertising partners, data analytics partners, operating systems and platforms, social media platforms, event sponsors, publicly available sources, or data providers. We may merge or combine such personal information with the personal information we collect from you directly or automatically.

**Referrals.** Customers and other users of our Services may have the opportunity to refer colleagues and other contacts to us and share their contact information with us. Please do not refer someone to us or share their contact information with us unless you have their permission to do so.

**Personal Information Collected Automatically.** The Company, our service providers, and our advertising partners may automatically log information about you, your computer, or mobile device, and your activity over time on our Services and other sites and online services, such as:

- **Online activity data**, such as the website you visited before browsing to the Services, pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- **Device data**, such as your computer or mobile device operating system type and version number, wireless carrier, manufacturer and model, browser type, screen resolution, IP address, unique identifiers, and general location information such as city, state, or geographic area.

Like many online services, we use the following technologies to facilitate some of the automatic data collection:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you

navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising.

- **Flash cookies**, or locally-stored objects, which are used on websites for purposes similar to cookies but allow storage of a larger amount of data.
- **Web beacons**, also known as pixel tags or clear GIFs, which are typically used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked, typically to compile statistics about usage of websites and the success of marketing campaigns.
- **Local storage**, which is used to save data on a visitor's device. We may use data from local storage to, for example, turn on web navigation, store multimedia preferences, customize what we show you based on your past interactions with our Services, and remember your preferences.
- **Session replay technologies**, which are third-party software programs that we may use on the Website or in some locations of the Services to record a video replay of users' interactions with the Website or Services. The video replay may include users' clicks, mouse movements, scrolls, mobile app touches, typing, and other activity taken during the session. We use these replays for research and development purposes, such as to help us troubleshoot problems with the Website, understand how users interact with and use the Website, and identify areas for improvement.

**De-identified Information.** We may also collect or create de-identified information from personal information in a manner that it cannot reasonably be used to infer information about, or otherwise be linked to, a particular individual. To the extent that we classify such information as "de-identified," we commit to maintaining and using such information in a de-identified form and to not attempting to re-identify such information (except for purposes permitted by law).

## HOW WE USE YOUR PERSONAL INFORMATION

The Company's primary purpose in collecting personal information is to provide the products and Services and to operate our business. We also use personal information for the purposes set forth below and as otherwise described in this Privacy Policy or at the time of collection.

**To Provide the Services.** We may use personal information to provide our Services and operate our business. For example, we use personal information to:

- process your transactions, including purchasing products and samples;
- establish, manage, monitor, and maintain your account;
- process your product for a warranty or rebate, or process your warranty claim;
- improve and personalize your experience on or with the Services;
- verify your identity or determine your eligibility for offers and promotions;
- communicate with you, including providing notices about your account or transaction (e.g., confirmations, invoices, notices, and updates) and responding to any of your requests, feedback, or questions;
- contact you by phone, email, SMS, or other form of communication;
- provide any contests, surveys, sweepstakes, or other promotions you participate in;
- provide maintenance and support; and
- fulfill any other purpose for which you provide personal information.

**Research and Development.** We use personal information for research and development purposes, including to study and improve the Services and our business, understand and analyze the usage trends and preferences of our users, and develop new features, functionality, products, and services. As part of

these activities, we may create aggregated, de-identified, or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes.

**Direct Marketing.** We may send you Company-related or other direct marketing communications as permitted by law, including materials, updates, information, special offers, and promotional material from us and our business partners. You may opt-out of our marketing communications as described in the “YOUR CHOICES” section below.

**Interest-Based Advertising.** We work with third-party advertising companies and social media companies to help us advertise our business and to display ads for our products and services. These companies may use cookies and similar technologies to collect information about you (including the online activity data and device data described above in the section called “Personal Information Collected Automatically”) over time across our Services and other websites and services or your interaction with our emails, and use that information to serve ads that they think will interest you. In addition, some of these companies may use hashed customer lists that we share with them to deliver ads to you and to similar users on their platforms. You can learn more about your choices for limiting interest-based advertising in the “YOUR CHOICES” section below.

**To Comply with Laws and Regulations.** We will use personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

**For Compliance, Fraud Prevention, and Safety.** We may use personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) maintain the safety, security, and integrity of the Services and our products and services, business, databases, and other technology assets; (b) protect our, your, or others’ rights, privacy, safety or property (including by making and defending legal claims); (c) audit our internal processes for compliance with legal and contractual requirements and internal policies; (d) enforce the terms and conditions that govern the Services; and (e) prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**With Your Consent.** We will disclose your personal information in accordance with your prior direction or, in some cases, we may specifically ask you for your consent to collect, use, or share your personal information, such as when required by law.

## **HOW WE SHARE YOUR PERSONAL INFORMATION**

In addition to the specific situations discussed elsewhere in this Privacy Policy or at the point of collection, we may share your personal information with the following entities or persons:

**Related Companies.** We may share your personal information with our affiliates, subsidiaries, and other related companies, including our partner brands, for example, to fulfill your transaction or for marketing purposes.

**Service Providers.** We may share your personal information with third parties who perform services on our behalf that are necessary for the orderly operation of our business. For example, we work with service providers that help us perform website hosting, maintenance services, database management, analytics,

fraud protection, marketing, rewards programs, customer relationship management, fulfillment, finances, and other purposes.

**Advertising Partners.** We may also share personal information with third parties who we partner with for advertising campaigns or that collect information about your activity on the Services for the purposes described in the “Interest-Based Advertising” section above.

**Professional Advisors.** We may share personal information with persons, companies, or professional firms providing the Company with advice and consulting in accounting, administrative, legal, tax, financial, debt collection, and other matters.

**Law Enforcement, Government Authorities, and Private Parties.** Under certain circumstances, we may be required to disclose personal information to law enforcement, government authorities, and other parties if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency). We may also disclose personal information in the good faith belief that such action is necessary to comply with a legal obligation or for the purposes described above in the section titled “For Compliance, Fraud Prevention, and Safety.”

**Business Transaction Participants.** We may disclose personal information to third parties in connection with any business transaction (or potential transaction) involving a merger, acquisition, sale of shares or assets, financing, consolidation, reorganization, divestiture, or dissolution of all or a portion of our business (including in connection with a bankruptcy or similar proceedings).

## **INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

The Company is based in the United States, and we have service providers in the United States and potentially other countries. Your personal information may be collected, used, and stored in these countries or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country. By providing your personal information, where applicable law permits, you specifically and expressly consent to such transfer and processing and the collection, use, and disclosure set forth herein.

## **YOUR CHOICES**

**Review and Request Changes to Your Account Personal Information.** We rely on you to update and correct the personal information contained in your account. If the Website does not permit you to update or correct certain personal information, please submit a request to us using the contact information listed at the end of this Privacy Policy. Note that we may keep historical information in our backup files as permitted by law.

**Marketing Emails.** You may opt-out of marketing-related emails by clicking the “unsubscribe” link at the bottom of the email or by contacting us as described below. You may still receive service-related communications, such as those relating to your account or order.

**Cookies.** Most browsers let you remove and/or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser’s settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the Services and our Website may not work properly. For more information about cookies, including

how to see what cookies have been set on your browser and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Analytics.** We use Google Analytics to help us analyze how the website properties are being accessed and used. You can learn more about Google Analytics cookies by clicking [here](#) and about how Google protects your data by clicking [here](#). To opt-out of Google Analytics, you can download and install the Google Analytics Opt-out Browser Add-on, available [here](#).

**Advertising Choices.** You can limit the use of your information for interest-based advertising by blocking third-party cookies in your browser settings, using browser plug-ins/extensions, and/or using your mobile device settings to limit the use of the advertising ID associated with your mobile device. You can also opt out of interest-based ads from companies participating in the following industry opt-out programs by visiting the linked websites: the Network Advertising Initiative ([http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)) and the Digital Advertising Alliance (<https://optout.aboutads.info>). Some of the companies we work with may offer their own opt-out mechanisms. For example, you can learn more about how Google uses cookies for advertising purposes by clicking [here](#) and opt-out of ad personalization by Google by clicking [here](#).

Many of the opt-out preferences described in this section must be set on each device and/or browser for which you want them to apply. Please note that some of the advertising companies we work with may not participate in the opt-out mechanisms described above, so even after opting-out, you may still receive interest-based advertisements from other companies. If you opt-out of interest-based advertisements, you will still see advertisements online but they may be less relevant to you.

**Do Not Track.** Some browsers may be configured to send “Do Not Track” signals to the online services that you visit. The Services currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

## **CHILDREN’S PRIVACY**

The Services are not intended for use by anyone under the age of 16, and we do not knowingly collect personal information from children under 16.

## **SECURITY OF YOUR PERSONAL INFORMATION**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from the risks presented by unauthorized access or acquisition, we cannot guarantee the security of your personal information.

## **THIRD PARTY WEBSITES AND SERVICES**

The Services may contain links to other websites and online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or online services that are not associated with us. We do not control third party websites or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use, and sharing of your personal information. We encourage you to read the privacy policies of the other websites and online services you use.

## NOTICE TO CALIFORNIA RESIDENTS

This section applies only to California residents and supplements the information provided elsewhere in this Privacy Policy. It describes how we collect, use, sell, share, and retain personal information of California residents, and their rights with respect to their personal information. For purposes of this section, “personal information” has the meaning given in the California Consumer Privacy Act of 2018, as amended (the “CCPA”), but does not include information exempted from the scope of the CCPA. In some cases, we may provide a different privacy notice to certain categories of California residents, in which case that notice will apply instead of this section.

**Personal Information Collected and the Purposes of Collection and Use.** The list below summarizes the personal information we collect, or have collected in the 12 months preceding the last updated date of this Privacy Policy, by reference to the categories specified in the CCPA. Examples in the list refer to the types of personal information described above in the section titled “PERSONAL INFORMATION WE COLLECT.”

- **Identifiers**, such as contact information, professional information, and referral information.
- **Customer Records**, such as product warranty and rebate information, payment information, order history, and communications.
- **Commercial Information**, such as account information, preferences, survey responses.
- **Internet or Network Activity**, such as online activity data and device data.
- **Audio, Electronic, Visual, or Similar Information**, such as customer service call or chat recordings.
- **Professional or Employment-Related Information**, such as professional information, rebate information, and survey responses.
- **Inferences**, such as inferences drawn from the personal information identified above to create a profile reflecting your preferences, characteristics, behavior.

We may collect these categories of personal information directly from you and from your device, and from third parties as further described in the section titled “PERSONAL INFORMATION WE COLLECT.”

The purposes for which we collect and use these categories of personal information are described in the section titled “HOW WE USE YOUR PERSONAL INFORMATION.”

To the extent that we may collect sensitive personal information (as defined in the CCPA), we only use or disclose it for purposes permitted under the CCPA (e.g., to perform the Services, detect security incidences and prevent fraud, and to verify and maintain the quality of the Services). We do not collect or use sensitive personal information for the purpose of inferring characteristics about California residents.

**Personal Information Disclosed for Business Purposes, “Sold,” or “Shared.”** In the 12 months preceding the last updated date of this Privacy Policy, we may have disclosed each category of personal information listed above to the persons and entities listed in the section titled “HOW WE SHARE YOUR PERSONAL INFORMATION” for the business purposes described in this Privacy Policy.

In addition, we “sell” or “share” (and in the 12 months preceding the last updated date of this Privacy Policy have “sold” or “shared”) Internet or Network Activity and Contact Information to our Advertising Partners to help us market or advertise to you and to measure activity on the Services as further described in the “Interest-Based Advertising” paragraph under the section titled “HOW WE USE YOUR PERSONAL INFORMATION.” These disclosures are called “selling” or “sharing” under the CCPA because we are either disclosing your personal information in exchange for some sort of valuable consideration, or because such disclosure is for the purpose of cross-context behavioral advertising. We do not knowingly “sell” or “share” the personal information of California residents under 16 years of age.

**Retention of Personal Information.** We will retain your personal information for as long as necessary to fulfill the purpose of collection, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish and defend legal claims, for fraud prevention purposes, or as long as required to meet our legal obligations. 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.

**Your California Privacy Rights.** As a California resident, in addition to the choices described elsewhere in this Privacy Policy, you have the rights listed below. Please note, these rights are not absolute, and, in some cases, we may not be able to respond to your request, such as when a legal exemption applies or if we are not able to verify your identity.

- **Right to know/access.** You can request the following information about how we have collected and used your personal information:
  - The categories of personal information we collected;
  - The categories of sources from which we collected that personal information;
  - Our business or commercial purpose for collecting, selling, or sharing (as applicable) that personal information;
  - The categories of third parties to whom we disclose that personal information (as applicable); and
  - The specific pieces of personal information we collected about you.
- **Right to delete.** You can request that we delete any of your personal information that we have collected from you.
- **Right to correct.** You can request that we correct inaccurate personal information that we maintain about you.
- **Right to opt-out of “sales”/“sharing.”** If we “sell” or “share” your personal information, you can request to opt-out.
- **Right to nondiscrimination.** You are entitled to exercise the rights described above without receiving discriminatory treatment.

**How to Exercise Your Rights.** You may exercise your California privacy rights described above using the following methods:

- **Right to know/access, delete, or correct.** Please submit these requests by calling us toll free at 1-855-797-0332 or by emailing us at [privacy@primesourcebp.com](mailto:privacy@primesourcebp.com).



- **Right to opt-out of sale/sharing.** To opt-out your personal information from “selling” and “sharing” relating to the automatic collection of data on our website properties by cookies and similar technologies, select the “Do Not Sell or Share My Personal Information” link at the bottom of the Website and update your preferences, or broadcast the Global Privacy Control (GPC) signal. Note that due to technological limitations, you will need to make your selections on each of our website properties. Additionally, if you visit our website properties from a different computer or device, or clear cookies on your browser that store your preferences, you will need to return to this screen to select your preferences and/or rebroadcast the GPC signal.

In addition, if you direct us not to sell/share your personal information, we will consider it a request pursuant to California’s “Shine the Light” law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.

We reserve the right to confirm your California residence to process your requests and will need to confirm your identity to process your requests to exercise your right to know/access, delete, and correct. This is a security measure to, for example, help ensure we do not disclose information to a person who is not entitled to receive it. The identity verification process may vary depending on how you submit your request.

Consistent with California law, you may designate an authorized agent to make a request on your behalf. If you do so, we may require proof of your identification, the authorized agent’s proof of identification, and any other information that we may request in order to verify the request, including evidence of valid permission for the authorized agent to act on your behalf. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee or decline to comply with your request if your request is clearly unfounded, repetitive, or excessive.

We try to respond to all legitimate requests to know/access, delete, and correct within 45 days of your request. Occasionally it may take us longer than 45 days to respond, for instance if your request is particularly complex or you have made a number of requests. In this case, we will notify you of the delay, and may continue to update you regarding the progress of our response.

## **NOTICE TO NEVADA RESIDENTS**

Nevada Revised Statutes Chapter 603A allows Nevada residents to opt-out of the “sale” of certain types of personal information. Subject to several exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to another person. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to the email address listed at the end of this Privacy Policy to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes.

## **CONTACT US**

If you have any questions or concerns about our Privacy Policy or any other privacy matters, please contact us at [privacy@primesourcebp.com](mailto:privacy@primesourcebp.com).

