

## **Fletcher Industries, Inc. Website Privacy Policy**

In compiling this policy, we have taken steps to ensure we have incorporated the standards and principles outlined in data collection and privacy frameworks, including, to the extent applicable, the European Union's General Data Protection Regulation and the California Consumer Privacy Act. This policy describes:

- The types of information we collect from you or that you may provide when you visit our website available at <https://fletcherindustries.com/>, as well as any websites and blogs directly owned by Fletcher (collectively, our "website").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

Please read this policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then please do not use our website. By using our website, you agree to the terms of this policy. This policy may change from time to time (see "Changes to This Policy" below). Your continued use of our website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **What We Collect and How We Collect It**

To ensure that we provide you with the best possible experience, we will store, use, and share information about you in accordance with this policy.

#### *Information You Provide to Us*

"Personal information" is any information that can be used to individually identify you from a larger group, such as data including, but not limited to, your:

- First and last name.
- Email address.
- Telephone number.
- Age.
- Mailing address.
- Comments or messages provided in free text boxes.

You may provide us personal information when you:

- Request information.
- Contact us.
- Subscribe to our emails.

#### *Automated Information Collection*

In addition to the information that you provide to us, we may also collect information about you during your visit to our website. We collect this information using automated tools that are detailed below. Information collected automatically normally includes your internet address (IP address), the pages you have viewed, and the actions you

have taken while using our website. Some of the tools we use to automatically collect information about you or your online experience may include:

- **Cookies.** A “[cookie](#)” is a small data file transmitted from a website to your device’s hard drive. Cookies are usually defined in one of two ways, and we may use both of them:
  1. Session cookies, which do not stay on your device after you close your browser.
  2. Persistent cookies, which remain on your device until you delete them or they expire.

Of course, if you do not wish to have cookies on your devices, you may turn them off at any time by modifying your internet browser’s settings. However, by disabling cookies on your device, you may be prohibited from full use of the website’s features or lose access to some functionality.

- **Retargeting Pixels.** Retargeting pixels track your visits to other websites via a cookie or device ID once you leave our website, allowing us to evaluate the success of our marketing campaigns. These pixels do not allow us to identify you personally, only that you have visited our website before and possibly viewed one of our advertisements on other websites or platforms.
- **Conversion Pixels.** Conversion pixels specifically help us understand if you do something specific (click a button, check a box) on a certain website. We cannot individually identify you from any information collected by these pixels.
- **Web Beacons.** A web beacon is an electronic image. Web beacons can track certain things from your computer and can report activity back to a web server allowing us to understand some of your online behavior. If you choose to receive emails from us, we may use web beacons to track your reaction to our emails. We may also use them to track if you click on the links and at what time and date you do so. Some of our third-party marketing partners may use web beacons to track your interaction with online advertising banners on our website. This information is only collected in aggregate form and will not be linked to your personal information. Please note that any image file on a webpage can act as a web beacon.
- **Embedded Web Links.** Links provided in our emails and, in some cases, on third-party websites may include tracking technology embedded in the link. The tracking is accomplished through a redirection system. The redirection system allows us to understand how the link is being used by email recipients. Some of these links will enable us to identify that you have personally clicked on the link and this may be attached to the personal information that we hold about you. This data is used to improve our service to you and to help us understand the performance of our marketing campaigns.
- **Third-party Websites and Services.** We work with a number of service providers of marketing communications technology. These service providers may use various data collection methods to improve the performance of the website and any marketing campaigns we are contracting them to provide. The information collected can be gathered on our website and also on the websites where our marketing communications are appearing. For example, we may collect data where our banner advertisements are displayed on third-party websites.
- **Google Analytics.** Our website sends aggregated, non-personal information to Google Analytics for the purpose of providing us with the ability to conduct technical and statistical analysis on the website’s performance. For more information on how Google Analytics supports the website and uses information sent from the website, please review Google’s privacy policy available at [policies.google.com/technologies/partner-sites](https://policies.google.com/technologies/partner-sites).

## Your Choices and Selecting Your Privacy Preferences

We want to provide you with relevant information that you have requested.

If we provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed. Transactional or service-oriented messages are usually excluded from such preferences, as such messages are required to respond to your requests or to provide goods and services, and are not intended for the purposes of marketing.

We will not intentionally send you email newsletters and marketing emails unless you consent to receive such marketing information. After you request to receive these emails, you may opt out of them at any time by selecting the “unsubscribe” link at the bottom of each email. Please note that by opting out or unsubscribing you may affect other services you have requested we provide to you, in which email communication is a requirement of the service provided.

Any such communications you receive from us will be administered in accordance with your preferences and this policy.

### **Accuracy and Access to Your Personal Information**

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing.

To view and change the personal information that you have provided to us, please contact us directly for assistance.

### **Information of Minors**

We do not intentionally seek to gather information from individuals under the age of eighteen. We do not target the website to minors, and would not expect them to be engaging with our website or services. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any personal information that we have collected about minors, we will take steps to securely remove it from our systems.

### **How We Use Your Information**

The information we gather and that you provide is collected to provide you information and the services you request, in addition to various other purposes, including, but not limited to:

- Assisting you with items such as personalized experiences, facilitation of product usage, and enforcement of Terms and Conditions.
- Preventing malicious activity and providing you with a secure experience.
- Providing service and support for services you request.
- Providing marketing communications that are effective and optimized for you.
- Keeping you up-to-date with the latest benefits available from us.
- Preventing unwanted messages or content.
- Measuring the performance of our marketing programs.
- Contacting you about services and offers that are relevant to you.

### **How We Share Your Information**

We do not sell or lease your information to any third party. We may disclose your personal information to our trusted third-party business partners in accordance with this policy. We work with a number of partners that help us process your requests, deliver customer service and support, send email marketing communications, and provide experiences that you have come to expect from us. We will share your personal information with these third parties in order to fulfill the service that they provide to us. These third-party partners are under contract to keep your personal information secure and not to use it for any reason other than to fulfill the service we have requested from them.

Except as described in this policy, we will not share your information with third parties without your notice and consent, unless it is under one of the following circumstances:

- Responding to duly authorized information requests from law enforcement or other governmental authorities.
- Complying with any law, regulations, subpoena, or court order.
- Investigating and helping prevent security threats, fraud, or other malicious activity.
- Enforcing or protecting the rights and properties of Fletcher or its subsidiaries.
- Protecting the rights or personal safety of Fletcher's employees.

There are circumstances where Fletcher may decide to buy, sell, or reorganize its business in selected countries. Under these circumstances, it may be necessary to share or receive personal information with prospective or actual partners or affiliates. In such circumstances, Fletcher will ensure your information is used in accordance with this policy.

### **California Residents**

Pursuant to California Civil Code Section § 1798.83, we will not disclose or share your personal information with third parties for the purposes of third-party marketing to you without your prior consent.

Other than as disclosed in this policy, the website does not track users over time and across third-party websites to provide targeted advertising. Therefore, the website does not operate any differently when it receives Do Not Track (DNT) signals from your internet web browser.

If you are a California consumer, as defined by the California Consumer Privacy Act of 2018, you may be afforded additional rights with respect to your "Personal Information" as that term is explicitly defined under California law. Any personal information we collect is collected for the commercial purpose of effectively providing our services to you, as well as enabling you to learn more about, and benefit from, our services. You may exercise each of your rights as identified below, subject to our verification of your identity.

Access. You may email us at [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com) to request a copy of the personal information our website databases currently contain.

Prohibit Data Sharing. When applicable, you may prohibit the sharing of your personal information by submitting a request via email to [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com). In your email, please explain how you wish us to prohibit the sharing of your personal information, and which categories of third parties you want to prohibit from receiving your personal information. When such prohibitions are not possible to provide our services to you, we will advise you accordingly. You can then choose to exercise any other rights under this policy.

Portability. Upon request and when possible, we can provide you with copies of your personal information. You may submit a request via email to [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com). When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this policy.

**Deletion.** If you should wish to cease use of our website and have your personal information deleted from our website, then you may submit a request by emailing us at [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com). Upon receipt of such a request for deletion, we will confirm receipt and will confirm once your personal information has been deleted. Where applicable, we will ensure such changes are shared with trusted third parties.

In addition to the email address provided above, you may also submit requests at the following telephone number: (910) 692-7133.

We do not sell your personal information. If we ever decide to sell personal information, we will update you via this policy and include a link entitled “Do Not Sell My Personal Information,” to provide you with an opportunity to opt out of sales of your personal information.

If a California resident exercises his or her rights under California law, including the California Consumer Privacy Act, we shall not discriminate against that California resident by denying our goods or services, charging different prices or rates to similarly situated consumers, providing a different level or quality of our goods or services, or taking any other adverse action.

### **Third-party Websites**

This policy does not apply to websites or other domains that are maintained or operated by third parties or our affiliates. Our website may link to third-party websites and services, such as LinkedIn, Twitter, and Facebook, but these links are not endorsements of these sites, and this policy does not extend to them. Because this policy is not enforced on these third-party websites, we encourage you to read any posted privacy policy of the third-party website before using the service or site and providing any information.

### **For Website Visitors in the European Union (EU)**

Under the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, or “**GDPR**”), individuals in the EU are afforded specific rights with respect to their Personal Information, or “personal data” as defined under the GDPR. For the purposes of this policy, Fletcher operates as a data controller. Any personal data we collect from you is processed in the United States under the terms of this policy.

Any personal data we collect from you is processed in the legitimate interest of our business and providing our services to you as the lawful means of such processing. You may always withdraw your consent to our use of your personal data as described below. We will only retain your personal data for the time necessary to provide you the information and services to which you have consented, to comply with the law and in accordance with your rights below.

You can exercise any of the following rights by notifying us as described below:

- **Access:** You may email us at [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com) to request a copy of the personal data our website currently contains.
- **Correction or Rectification:** You can correct what personal data our website currently contains by emailing us at [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com) to request that we correct or rectify any personal data that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.
- **Restrict Processing:** When applicable you may restrict the processing of your personal data by submitting a request via email to [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com). In your email, please explain how you wish Fletcher to restrict processing of your personal data. When such restrictions are not possible, Fletcher will advise you accordingly. You can then choose to exercise any other rights under this policy, to include withdrawing your consent to the processing of your personal data.

- **Object to Processing:** When applicable, you have the right to object to the processing of your personal data by submitting a request via email to [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com) . When such objections are not possible, Fletcher will advise you accordingly. You can then choose to exercise any other rights under this policy, to include withdrawing your consent to the processing of your personal data.
- **Portability:** Upon request, and when possible, Fletcher can provide you with copies of your personal data. You may submit a request via email to [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com) . When such a request cannot be honored, Fletcher will advise you accordingly. You can then choose to exercise any other rights under this policy, to include withdrawing your consent.
- **Withdraw Consent:** At any time, you may withdraw your consent to our processing of your personal data through this website by notifying us via email at [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com) . Using the same email address you have provided to Fletcher, simply type the words “WITHDRAW CONSENT” in the subject line of your email. Upon receipt of such a withdrawal of consent, Fletcher will confirm receipt and proceed to stop processing your personal data.
- **Erasure:** If you should wish to cease use of our website and have your personal data deleted from our website, then you may submit a request by emailing us at [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com) . Upon receipt of such a request for erasure, Fletcher will confirm receipt and will confirm once your personal data has been deleted.
- **Submit Complaints or Questions.** If you wish to raise a complaint on how we have handled your personal data, you can contact us as described below. If you reside in a European Union member state, you may also lodge a complaint with the supervisory authority in your country.

#### **For Other Website Visitors Outside of the United States**

To provide you with our services, we may store, process, and transmit information in the United States and other locations around the world, including countries that may not have the same privacy and security laws as yours. Regardless of the country in which such information is stored, we will process your Personal Information in accordance with this Policy.

#### **Safeguarding the Information We Collect**

We use reasonable technical, administrative, and physical safeguards in order to protect your Personal Information against accidental loss and from unauthorized access, use, alteration, and disclosure. However, we can never promise 100% security. You have a responsibility, as well, to safeguard your information. If you believe your information has been improperly provided to us or misused, please contact us immediately.

#### **Changes to This Policy**

If we make any changes to this policy, a revised policy will be posted on this webpage and the date of the change will be reported in the “Last Revised” block above. You can get to this page from any of our webpages by clicking on the “Privacy” link (usually at the bottom of the screen).

#### **How to Contact Us**

We value your opinions and welcome your feedback. To contact us about this Privacy Policy or your personal information, please contact us at:

Fletcher Industries, Inc.  
Attention: Privacy Policy  
E-mail: [marketingprivacy@fletcherindustries.com](mailto:marketingprivacy@fletcherindustries.com)

In your correspondence, please ensure that you write "PRIVACY" in your subject line so that it is routed in a timely and efficient manner.