

Petersen Aluminum Corporation	Revision Date: 2018-06-28
Privacy and Cookie Notice	Effective Date: 2018-05-25

1. Purpose

Petersen Aluminum Corporation ("Petersen") provides this *Privacy and Cookie Notice* ("*Privacy Notice*") to explain our practices regarding the processing of certain individually identifiable information about visitors of this website and contact persons of our corporate customers and suppliers ("Personal Data"). As such, this *Privacy Notice* applies to Personal Data that we collect via our websites, as well as through trade shows and other offline means (e.g., submitted forms or orders, information needed to determine eligibility), where applicable.

2. Summary of Information Practices

Collection	As a business-to-business ("B2B") organization, we collect your Personal Data to carry out our commercial relationships.
Use	We use your Personal Data to perform transactions, respond to requests, manage accounts, maintain business operations, operate and optimize our website, improve our products or services, provide relevant marketing, and fulfill other business and compliance obligations.
Sharing	We share your Personal Data, as necessary, to perform transactions, respond to requests, manage accounts, maintain business operations, operate and optimize our website, improve our products or services, provide relevant marketing, and fulfill other business and compliance obligations.
Marketing Choices	You have control over how we use your Personal Data for direct marketing (and other limited) purposes.
Cookies	We use, and allow certain third parties to use, cookies on our website, and provide choices on the use of such cookies, including third party targeting and advertising.
Data Subject Rights	With respect to your Personal Data, you have the right to access, rectification, erasure, restriction of processing, or portability, where required by applicable law.
Data Security	We maintain technical and organizational measures to protect Personal Data from loss and unauthorized access, use, destruction, modification, or disclosure.
Cross-Border Data Transfers	We provide appropriate protections for cross-border transfers of Personal Data, where required by applicable law.



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Other Information	We provide other information via this <i>Privacy Notice</i> regarding the legal basis for collecting and processing Personal Data, the consequences of not providing Personal Data, automated decision-making, do not track ("DNT") signals, data retention, third party websites, employee and contractor privacy issues, and changes to this <i>Privacy Notice</i> .
Contact Us	Please contact us as detailed below with any questions or comments regarding this <i>Privacy Notice</i> .

3. Collection of Personal Data

We collect the following categories of Personal Data:

- 3.1. **Basic information:** Name and contact information (e.g., mailing address, email address, telephone number), date of birth, gender, job title and responsibilities, company, trade union or associated membership information, and any other Personal Data that you submit to us during the course of business.
- 3.2. **Registration information:** Data required to fulfill requests to receive newsletters, download or subscribe to content, register for conferences, and create website accounts and passwords.
- 3.3. **Marketing information:** Data gathered from individual participation in trade shows, seminars, and conferences, as well as credentials, product or service interests, and preferences.
- 3.4. Compliance information: Government identifiers and eligibility data.
- 3.5. **Transaction information:** Billing and account information.
- 3.6. **Job applicant information:** Data provided by job applicants via our website or offline means in connection with employment opportunities.
- 3.7. **Device information:** Internet Protocol (IP) address, unique device identifier (UDID), location, information collected through cookies and similar technologies, and data about usage of our website. Note, however, that we do not consider device information to be Personal Data except where we can link it to you as an individual, or where applicable law provides otherwise.

4. Use of Personal Data

We collect your Personal Data for the following purposes:

Processing Purposes	Category(ies) of Personal Data
Performing transactions and responding	Basic information
to your requests, including providing	 Registration information



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customer service and addressing customer satisfaction issues	Transaction informationDevice information
Managing customer and supplier accounts and relationships, and maintaining our business operations	 Basic information Registration information Transaction information Device information
Making our website more intuitive and easy to use	Device information
Improving our product, including performing analysis and research and development	Marketing informationDevice information
Protecting the security and effective functioning of our website and information technology systems	 Basic information Registration information Transaction information Device information
Providing relevant marketing	 Basic information Registration information Marketing information Transaction information Device information
Addressing our compliance and legal obligations and exercising our legal rights	 Basic information Registration information Compliance information Transaction information Device information
Considering individuals for employment and contractor opportunities, and managing onboarding procedures	 Job applicant information

5. Sharing of Personal Data

We share your Personal Data with the following categories of recipients for the following purposes:



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- 5.1. Carlisle Companies Incorporated (or its subsidiaries): We share your Personal Data with Carlisle Companies Incorporated or its wholly-owned subsidiaries, as necessary in order to carry out the purposes identified above, in particular to centralize administration and business management. Note that the list of our subsidiaries can be found on our corporate website at: www.carlisle.com/our-businesses/default.aspx.
- 5.2. **Certain third parties:** We share your Personal Data with certain third parties, as detailed below, to enable such third parties to perform functions under our instructions. We require such parties, by contract, to provide reasonable security for your Personal Data and to process such data only on our behalf.
 - 5.2.1. **Suppliers and service providers:** We share your Personal Data with suppliers and service providers to carry out the purposes identified above, in particular to make our website or products or services available to you, or to provide assistance with logistics, mailing services, or regulatory compliance.
 - 5.2.2. Auditors, advisors, and financial institutions: We share your Personal Data with auditors for the performance of audit functions, with advisors for the provision of legal and other advice, and with financial institutions in connection with payment and other transactions.
- 5.3. Certain acquiring or acquired entities: We share your Personal Data with any corporate purchaser or prospect, to the extent permitted by law, as part of any merger, acquisition, sale of company assets, or transition of service to another provider, as well as in the event of insolvency, bankruptcy, or receivership in which your Personal Data would be transferred as an asset of Petersen.

Petersen may also disclose your Personal Data to comply with any subpoena, court order or other legal process, or other governmental request. We may also share your Personal Data to establish or protect our legal rights, property, or safety (or the rights, property, or safety of others), or to defend against legal claims.

6. Marketing Choices

You have control regarding our use of your Personal Data for direct marketing. If you no longer wish to receive any direct marketing communications, you can opt-out at any time. To do so, use the unsubscribe link on our website or visit your contact preferences page.

7. Cookies

In accordance with applicable law, we use, and allow certain third parties to use, cookies, web beacons, and similar tracking technologies (collectively, "cookies") on our website.

7.1. What are cookies? Cookies are small amounts of data that are stored in your web browser, on your device, or on the webpage you are viewing. Some cookies



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are deleted once you close your web browser ("session cookies"), while other cookies are retained on your device (until they are erased) even after closing your web browser so that you can be recognized when you return to a website ("persistent cookies"). More information about cookies and how they work is available at: www.allaboutcookies.org.

- 7.2. How do we use cookies? We use cookies to provide our website and services, to gather information about your usage patterns when you navigate this website in order to enhance your personalized experience, and to understand usage patterns to improve our website, products, and services. We also allow certain third parties to place cookies on our website in order to collect information about your online activities on our website, over time and across different websites that you visit. This information is used to provide advertising tailored to your interests on websites you visit, also known as interest-based advertising, and to analyze the effectiveness of such advertising. Cookies on our website are generally divided into the following categories:
 - 7.2.1. Strictly Necessary Cookies: Session cookies that are required for the operation of our website (e.g., cookies that enable you to login to secure areas of our website).
 - 7.2.2. Analytical/Performance Cookies: Session cookies that allow us to recognize and count the number of users of our website, and help us to improve the functionality of our website (e.g., cookies that allow us to analyze how users navigate through our website, which helps us to determine whether users are able to easily find what they are seeking). [Note that this website uses Google Analytics for these purposes.]
 - 7.2.3. **Functional Cookies:** Persistent cookies that improve the functional performance or convenience of our website (e.g., cookies that enable you to remain logged in for subsequent visits to our website).
 - 7.2.4. **Targeting Cookies:** Persistent cookies that are used to record your visit to our website, the pages you have visited, and the links you have followed, and to recognize you as a previous visitor and to track your activity on this website and other websites you visit.
- 7.3. What are your options if you do not want cookies on your device? To exercise choices with regard to certain cookies (e.g., disable, delete), you can review your Internet browser settings, typically under the "Help" or "Internet Options" sections. If you disable or delete certain cookies in your Internet browser settings, you might not be able to access or use important features or functions of this website, and you may be required to re-enter your login details.

To learn more about the use of cookies for Google analytics and to exercise choice regarding such cookies, please visit: <u>https://tools.google.com/dlpage/gaoptout</u>.



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To learn more about certain cookies used for interest-based advertising, including through cross-device tracking, and to exercise choices regarding such cookies, please visit the following websites (or your device settings for mobile applications):

- Digital Advertising Alliance (<u>http://optout.aboutads.info/</u>)
- Network Advertising Initiative (<u>http://optout.networkadvertising.org/</u>)
- EU Interactive Digital Advertising Alliance (<u>http://www.youronlinechoices.eu</u>)
- Digital Advertising Alliance-Canada (<u>http://youradchoices.ca/choices/</u>)

8. Data Subject Rights

Where required by applicable law, you have the right to obtain confirmation that we maintain certain Personal Data about you (and the right to verify its content, origin, and accuracy), as well as the right to access, rectify, erase, restrict processing (i.e., withdraw consent without affecting the lawfulness of processing based on consent before its withdrawal), or port such data. In particular, you have the right to object to our use of your Personal Data for direct marketing purposes, and certain other purposes, at any time. You also have the right to lodge a complaint with the competent data protection supervisory authority. Note, however, that we may retain certain Personal Data as required or permitted by applicable law.

9. Data Security

We maintain technical and organizational measures to protect your Personal Data against loss and unauthorized access, use, destruction, modification, or disclosure, appropriate to the level of risk and sensitivity of the Personal Data. However, no degree of preventive security measures can guarantee against compromise; you also have an important role in protecting your Personal Data. You should not share your user name or password with anyone, and you should not reuse passwords across more than one website. If you have any reason to believe that your user name or password has been compromised, please contact us as detailed below.

10. Cross-Border Data Transfers

We transfer your Personal Data to various jurisdictions as necessary for the purposes described herein, including to jurisdictions that may not provide the same level of data protection as your home country. We provide appropriate protections for cross-border transfers as required by applicable law for international data transfers. With respect to transfers originating from the European Economic Area ("EEA"), we implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers as required by applicable law. Where required by such laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below.



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11. Other Information

- 11.1.**Legal Basis for Processing Personal Data.** We rely on the following legal grounds for the processing of Personal Data:
 - 11.1.1. Performance of a transaction with you (e.g., responding to your requests);
 - 11.1.2. Compliance with legal obligations (e.g., keeping records to substantiate a tax liability);
 - 11.1.3. Consent, as permitted by applicable law (e.g., for the purposes of sending direct marketing communications or using certain cookies); and,
 - 11.1.4. Legitimate interest of Petersen (or its subsidiaries) or other third parties (e.g., preventing misuse of IT systems, addressing logical security, conducting intended mergers and acquisitions). Note that, as a B2B organization, we typically collect and process limited Personal Data about customer contacts and individuals acting in their business capacities as part of our overall effort to reduce the privacy impact on individuals.
- 11.2. **Consequences of Not Providing Personal Data.** You are not required to provide all of the Personal Data defined in this *Privacy Notice* in order to use our website or to interact with us offline. If you do not provide certain Personal Data, however, certain functionality will not be available to you, and we may not be able to respond to your requests, perform a transaction with you, or provide you with marketing that we believe you would find valuable.
- 11.3. Automated Decision-Making Without Human Intervention. We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects or otherwise significantly affects you.
- 11.4.**Do Not Track ("DNT") Signals Sent via Browsers.** Given the divergent practices of organizations that offer browsers, and the lack of a standard in the marketplace, we do not respond to DNT signals at this time.
- 11.5. **Retention of Personal Data.** We retain Personal Data collected and processed for marketing purposes for as long as you accept marketing communications from us but, upon request, we will securely delete such data in accordance with applicable law. We retain Personal Data collected and processed for all other purposes for no longer than the period necessary to fulfill the purposes outlined herein, and as otherwise needed to address tax, corporate, compliance, and litigation (and other legal rights) obligations.
- 11.6. **Third Party Websites.** This website contains links and references to other websites administered by unaffiliated third parties; any such third party websites are not governed by this *Privacy Notice*. When you follow a link to visit a third party website, you will be subject to the privacy and security practices of the unaffiliated third party administrator. We encourage you to familiarize yourself with the privacy and security practices of any such third parties before providing Personal Data on their websites.



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- 11.7.**Employee and Contractor Privacy Issues.** Employees and contractors are informed about our privacy and security practices through internal company policies and procedures.
- 11.8. Changes to *Privacy Notice*. We may update this *Privacy Notice* from time to time as our business (including privacy and security practices) changes, or as required by law. The effective date of our *Privacy Notice* is provided herein, and we encourage you to visit our website periodically to stay informed about our privacy and security practices. We will post the most current version of our *Privacy Notice* on our website and ask for your consent to the changes, as required by law.

12. Contact Us

If you have any questions or comments about this *Privacy Notice*, or if you would like to request rights or a copy of the appropriate safeguards concerning your Personal Data, you may contact us at <u>communications@carlisleccm.com</u> or Carlisle Construction Materials, ATTN: Integrated Marketing Communications, 1275 Ritner Highway, Carlisle, PA 17013.

Should you wish to contact Carlisle Companies Incorporated (i.e., parent company), you may do so by emailing <u>privacy@carlisle.com</u>.