

Privacy Policy

Effective Date: December 4, 2025

This Privacy Policy ("**Policy**") describes how Zekelman Industries and its affiliates and related entities (collectively, "**we**," "**our**," or "**us**"), processes Personal Information through our websites that post a link to this Policy, including www.zekelman.com (collectively, the "**Site**").

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Personal Information We Collect

"**Personal Information**" means information that identifies, relates to, or could be linked to an individual. Personal Information does not include anonymized information that is maintained in a form that is not capable of being associated with or linked to an individual.

We may obtain Personal Information about you in various ways, including directly from you, automatically through the Site, from our vendors and service providers, and from third parties. For example, we may collect Personal Information from you when you register for services, submit a contact request, or browse the Site.

We may obtain the following categories of Personal Information about you:

- **Contact Information and Identifiers**, including name, address, e-mail, phone number, and other similar identifiers.
- **Professional or Employment-related Information**, including company name and job title.
- **Account Information**, including account login, full payment account number, and billing information when you submit a payment through our Site.
- **Commercial Information**, including recent and upcoming purchases.
- **Geolocation data**, including information we derive from your IP address.
- **Internet or Other Electronic Network Activity Information**, including internet and browser identifiers, such as browser type and domain name; device details, such as operating system, IP address, and device ID; operating system; information about your use of the Site; and browsing behavior, such as the pages you visit, the time and duration of your stay, and your referring URL.

The Personal Information we collect from you may be combined with information we receive from vendors and third parties.

Cookies and Other Similar Technologies

We and our vendors may use cookies, web beacons, and other similar online tracking technologies (collectively, “**Cookies**”) to collect Internet or Other Electronic Network Activity Information about you and your interactions with the Site to help us understand and analyze how users interact with our Site, administer and improve the quality of our Site, and serving advertisements.

We may utilize technology provided by our vendors (such as Google Analytics and TikTok) in connection with your actions on our Site, including for advertising purposes and to better understand your interactions and experiences, including features that you engage and interact with. These technologies and advertisers may use, store, or access Cookies. Certain Sites may use Google advertising features such as remarketing with analytics, demographics reporting, and interest-based advertising.

GPS (global positioning systems) software, geo-filtering and other location-aware technologies locate (sometimes precisely) you, or make assumptions about your location, for purposes such as verifying your location and delivering

or restricting content based on your location. If you have enabled GPS or use other location-based features on the Site, your device location may be tracked for purposes such as real time pricing and inventory information based on location.

The following vendors offer additional information regarding Cookie processing and/or tools that you can use to manage your Cookie preferences, including to limit or opt out of certain interest-based advertising:

- **Google:** For more information on how Google Analytics uses the data it collects, visit policies.google.com/technologies/partner-sites. To opt out of Google Analytics Cookies, visit tools.google.com/dlpage/gaoptout. To adjust your Google advertising settings, visit adssettings.google.com.
- **Facebook (Meta):** To change your settings with Facebook, log into your Facebook account and navigate to the Privacy Center at facebook.com/privacy/center or review your Ad Preferences at facebook.com/adpreferences.

To opt out of interest-based advertising from companies that participate in the Digital Advertising Alliance (“**DAA**”) or Network Advertising Initiative (“**NAI**”) opt-out programs, please visit the [DAA](https://www.aboutads.info/choices) and the [NAI](https://www.networkadvertising.org/choices/).

You may be able to manage Cookies using the settings in your browser. Note that your choices will apply only to your browser or device you are using when you opt out, and you will still receive ads, but they may not be relevant to you. Your web browser may have settings that allow you to transmit a “Do Not Track” signal when you visit websites. Like many websites, our Site does not respond to Do Not Track signals.

How We Use Personal Information

We may use and retain Personal Information about you, for any purposes not inconsistent with our statements under this Policy, or otherwise made by us in writing at the point of collection, and not prohibited by applicable law, including, without limitation, the following purposes:

- **Offer Services**, including by allowing you to participate in the features we offer on the Site; servicing and maintaining your account; processing your payments and other transactions; communicating with you regarding our Site and services; and facilitating, managing, personalizing, and improving your online experience.

- **Communicate**, including providing information about our Site and services; and contacting you regarding services, billing, and transactions; updating you about features and offers that we believe will be of interest to you; responding to questions or feedback; and conducting user surveys.
- **Provide Advertising and Marketing**, including serving advertisements, measuring the use of our Site and effectiveness of our advertising and marketing, and developing insights to improve our Site and provide our users with enhanced features and functionalities.
- **Operate Our Business**, including transacting with you; providing you with information you requested about our services; identifying prospective customers, service providers, vendors, and partners; managing our relationships with our customers, service providers, vendors, and partners; performing system administration and technology management; carrying out internal administration, such as recordkeeping and auditing; and carrying out other internal business purposes.
- **Maintain Security and Integrity**, including authenticating users; protecting our Site from cyber risks; enforcing our policies and terms; preventing, identifying, investigating, and responding to fraud, illegal or malicious activities, and other liabilities; protecting our rights; fulfilling our legal obligations; and generally providing a secure Site experience.
- **Manage Legal and Compliance**, including complying with applicable laws, court orders, and regulations; assisting in investigations; protecting and defending our rights and property; and enforcing our terms, policies, or any agreements.
- **Facilitate Corporate Restructuring**, including evaluating, negotiating, or executing a merger, acquisition, reorganization, restructuring, divestiture, dissolution, or other sale or transfer of some or all of our assets, as part of regular business operations or pursuant to a bankruptcy, liquidation, or similar proceeding.
- **Fulfill Other Purposes** disclosed at the time you provide Personal Information or otherwise where we are legally permitted or are required to do so.

How We Disclose Personal Information

We may disclose your Personal Information for the purposes described above to the following parties:

- **Our Affiliates and Other Brands** for our business purposes.
- **Agents, Vendors, and Service Providers** so that they may provide their services to us and help us operate our business, including Site operation and maintenance, product and customer support, promotional support, payment processing, and quality control.
- **Advertising partners** for the purposes of ad targeting, customized advertising content, and remarketing.
- **Government Entities, Professional Advisors, and Other Parties** to protect our operations and our or others' rights, privacy, safety, or property; enforce our terms and conditions; comply with law or legal process; respond to requests from public and government authorities; and allow us to pursue available remedies or limit the damages that we may sustain.
- **Parties to Transactions** as part of or during any negotiations of any merger, acquisition, reorganization, restructuring, divestiture, dissolution, or other sale or transfer where a party assumes control over all or part of our business or assets.

Sweepstakes, Contests, and Promotions

We may offer sweepstakes, contests, and other promotions (each, a "**Promotion**"), including Promotions jointly sponsored or offered by third parties, which may require submitting Personal Information. If you voluntarily choose to enter a Promotion, your information, including Personal Information, may be disclosed to us and our co-sponsors, vendors, service providers, and other parties, including for administrative purposes and as required by law (e.g., on a winners list). By entering, you are agreeing to the official rules that govern that Promotion, which may include consent to additional or differing data practices from those contained in this Policy. Please review those rules carefully.

Linked Services

The Site may include hyperlinks to websites, locations, platforms, applications, or other services operated by third parties ("**Linked Service(s)**"). This Policy does not apply to those Linked Services, which may have their own privacy policies and terms that describe how they may use and disclose your Personal Information. We are not responsible for the content or privacy practices of any Linked Services.

Some of these Linked Services may license our name and marks or may be operated by our affiliates. Unless indicated otherwise, these Linked Services are not governed by this Policy, and we encourage you to review the privacy policy posted on those Linked Services.

Your Choices

If you have an account with us, you can review and change certain Personal Information at any time by accessing your account.

If you receive promotional emails from us, you may opt out by clicking the "Unsubscribe" link included in our emails. Please note that we may still send you administrative emails, even if you opt out of marketing emails.

You can opt out of direct marketing by contacting us [here](#).

Data Safeguards

We take reasonable measures to protect Personal Information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the internet and online digital storage are not completely secure and we do not guarantee the security of your information collected through the Site.

Cross-border Transfer of Personal Information

The Personal Information we collect may be transferred to, used in, stored in, or otherwise processed in countries or provinces other than the country or province where you are resident, including the United States and Canada, and be accessible to the law enforcement and national security authorities of those

jurisdictions. These jurisdictions may have data protection laws that are different from those of your place of residence. Your use of the Site or provision of any Personal Information to us constitutes your consent to the transfer to and from, usage, sharing, storage, and other processing of your information in those jurisdictions, as set forth in this Policy.

Children's Privacy

The Site is not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under the age of 13. If we become aware that we have collected Personal Information from a child under the age of 13 we will remove the data as required by applicable law.

California Privacy Disclosures

This section is provided pursuant to the California Consumer Privacy Act ("**CCPA**") and applies to Personal Information we process about California residents that use or access our Site and otherwise use our services.

The disclosures that describe how and why we collect, use, and disclose Personal Information also describe how we have collected, used, and disclosed Personal Information in the preceding twelve (12) months.

How We Collect, Use, and Disclose Personal Information of California Residents

We may collect the Personal Information described in the "Personal Information We Collect" section from the Sites and from offline sources. In addition, we may collect the following Personal Information from online and offline sources:

- **Personal Information Described in Cal. Civ. Code § 1798.80(e)**, including name, signature, address, telephone number, education and employment information, or employment history.
- **Audio, Electronic, Visual, or Similar Information**, including recorded calls.
- **Inferences** used to create a profile reflecting the consumer's preferences, characteristics, and behavior.

We use and disclose this Personal Information as described in the “How We Use Personal Information” and “How We Disclose Personal Information” sections. Terms defined in the CCPA that are used in this section shall have the same meaning as in the CCPA.

How We Sell and Share Personal Information

Under the CCPA, a “sale” of Personal Information includes disclosures of Personal Information to third parties who may use the information for their own purposes, such as cookie providers. In the context, we “sell” Personal Information. We sell and share for cross-context behavioral advertising, the following categories of Personal Information: identifiers, Personal Information Described in Cal. Civ. Code § 1798.80(e), internet or other electronic network activity information, and geolocation data.

We have sold and shared Personal Information to third parties, including our advertising partners, vendors, and other third parties for cross-context behavioral advertising and other marketing and advertising services on the Site. We do not have actual knowledge that we sell or share the Personal Information of consumers under 16 years of age.

California Privacy Rights

If you are a resident of California, subject to certain conditions and restrictions, you have the following rights with regard to your Personal Information:

- **Right to Know and Access.** You have the right to know what Personal Information we have collected about you, including: the categories of Personal Information we have collected about you; the categories of sources from which the Personal Information is collected; our business or commercial purpose for collecting, selling, or sharing Personal Information; the categories of recipients to whom we disclose Personal Information; and the specific pieces of Personal Information we have collected about you.
- **Right to Delete Your Personal Information.** You have the right to request that we delete Personal Information we obtained about you, subject to certain exceptions.
- **Right to Correct Inaccurate Personal Information.** If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.
- **Right to Opt Out of Sales and Sharing of Personal Information.** You have the right to opt out of the sale of your Personal Information and the

processing of your Personal Information for cross-context behavioral advertising. If the Site sells and/or shares Personal Information, you can opt out by clicking the “Manage Cookies” link in the Site footer and managing your preferences. If the Site does not include this link, it does not sell or share Personal Information as defined under the CCPA. If you choose to use the Global Privacy Control (GPC) browser signal, Sites that offer the opportunity to opt out of the sale and sharing of your Personal Information will opt you out, as explained in the Site’s Cookie preference center. You will need to turn GPC on for each browser you use.

We do not use automated decisionmaking in furtherance of decisions that produces a legal or similarly significant effects.

To exercise any of these above rights, please email legal@zekelman.com or call us at 312-275-1600.

We may request additional information from you to help us confirm your identity before we fulfill certain privacy rights requests. You may designate an authorized agent to make a request on your behalf, but you may still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the email or toll-free number listed above.

If you choose to exercise any of these privacy rights, we will not discriminate against you.

Retention of Personal Information

We maintain Personal Information for as long as is necessary for the purposes described in this Policy or otherwise authorized by law. This generally means holding the information for as long as one of the following apply: the Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information; the Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected; the Personal Information is reasonably required to protect or defend our rights or property; or we are otherwise required or permitted to keep Personal Information by applicable laws or regulations. Where Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

Shine the Light

We provide California residents the option to opt in to or opt out of sharing of “Personal Information” as defined by California’s “Shine the Light” law with

third parties, other than our Affiliates, for such third parties' own direct marketing purposes. California residents may exercise that opt-out, and/or request information about Zekelman Industries' compliance with the Shine the Light law, and obtain disclosure of third parties Zekelman Industries has shared information with in accordance with the law for their direct marketing purposes absent your choice and the categories of information shared, by contacting Zekelman Industries [here](#) or by sending a letter to Zekelman Industries at 191 North Wacker Drive, Suite 2100, Chicago, IL 60606 (Attention: Legal Department) or by emailing privacy@zekelman.com. Requests must include "California Shine the Light Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that Zekelman Industries is only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the provided e-mail or mailing address.

Canada Privacy Disclosures

This section is provided pursuant to the applicable Canadian privacy laws and applies to Personal Information we collect, use, and disclose in Canada through our Site and services.

How We Collect, Use, and Disclose Personal Information of Canadian Residents

We may collect the Personal Information described in the "Personal Information We Collect" section from the Sites and from offline sources. In addition, we may collect the following Personal Information from online and offline sources:

- **Audio, Electronic, Visual, or Similar Information**, including recorded calls.

We use and disclose this Personal Information as described in the "How We Use Personal Information" and "How We Disclose Personal Information" sections.

Canada Privacy Rights

If your Personal Information is collected in Canada, subject to certain conditions and restrictions, you have the following rights with regard to your Personal Information:

- **Right to Access.** You may have the right to request access to the Personal Information we hold about you.
- **Right to Delete Your Personal Information.** You have the right to request that we delete Personal Information we obtained about you, subject to certain exceptions.
- **Right to Correct Inaccurate Personal Information.** If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.
- **Withdraw your Consent.** If you provided your consent to the collection, use, and transfer of your Personal Information, you may withdraw your consent under certain circumstances. If you withdraw your consent, we may be unable to provide you with certain services.

To exercise any of these above rights, please email legal@zekelman.com.

We may request additional information from you to help us confirm your identity before we fulfill your privacy rights request.

Policy Updates

We may update this Policy, as indicated by the “Effective Date” date at the top of this Policy. Any changes to this Policy will be effective as of the Effective Date, unless otherwise expressly indicated. We encourage you to review this Policy whenever you visit the Site.

Contact Us

If you have any questions about this Policy, please contact us at legal@zekelman.com.