Privacy Policy

Effective Date: Date of Website Launch

Introduction

PTC Alliance LLC and its affiliates ("PTC Alliance", "we", "us" or "our") operates the website located at PTCSteel.com to provide information regarding the industrial application goods we sell to business customers, including Drawn-Over-Mandrel Tubing (DOM), Electrical Resistance Welded Tubing (ERW), Cold Drawn Seamless Tubing (CDS), Chrome Plated Tubing and Bar, Tubular and Bar Machined Components, and Oil Country Tubular Goods (OCTG). We have adopted this Privacy Policy to explain what information we collect from or about visitors to our website ("you" or "your"), how we use it, and who we share it with. This Privacy Policy applies only to information we collect through our website and does not apply to our collection of information from other sources.

By using our website, you agree to this Privacy Policy. If you object to our data collection practices or any of the provisions in this Privacy Policy your choice is to stop using our website.

Updates and Effective Date

From time to time, we may update this Privacy Policy to reflect changes in the function of our website or changes in our technology and use of data. If we make a change to this Privacy Policy that materially reduces your rights or significantly changes the way we use or share your data, we will provide notice, such as by posting a banner on the homepage of our website. Such changes will be effective when posted. The date the Privacy Policy was last revised is identified at the top of the page. By continuing to use this website following our posting of such changes, you agree to our Privacy Policy as modified.

Types of Information Collected

Information You Provide

You can generally browse our website without providing any personally identifiable information. However, in order to access our customer portal, you will need to create an account with us, which will require you to provide your first and last name, email address, and the name of the company you represent in dealing with us, as well as a username and password. Please note that it is your responsibility to protect the security of any login credentials that you create to access the customer portal or other features on our website.

Our website also allows you to submit a "Contact Us" form to share any questions or concerns you may have. This form requires you to provide your name, phone number, and email address, and gives you the option to include additional information, such as mailing address.

Automatic Collection

In addition to information you provide to us, we may use automatic data collection technologies to collect certain information as you browse or use our website, including:

- Details of your visit to our website, such as traffic data, location data, and the webpages that you access and use on our website;
- Information regarding your device, such as browser or device model and settings, operating system, and unique identifiers; and
- Data about how your browsers and devices interact with our website, including IP address and system activity, and the date, time and URL of the site you visited before our website.

We may use different tools and technologies for automatic data collection, including cookies. For example, many of our webpages use cookies to help us understand site usage, improve the content and offerings on our websites and apps, or personalize your experience. The use of cookies helps us to serve you better by understanding your interests, tracking trends, saving your preferences, and storing information you may want to retrieve on a regular basis, such as your saved login information. You can disable cookies by adjusting the settings on your browser. However, if you choose to disable some or all cookies, some parts of our website may no longer work for you.

In addition to cookies, we also use Google Analytics to help us understand how individuals use our website. Specifically, Google Analytics collects statistics on our website visitors, such as where visitors have come to our website from, how long a visitor spends on our site and the pages they visited, and other related information. As part of this service, your web browser will automatically send certain information to Google. Please see Google's Privacy Policy, currently available at https://policies.google.com/technologies/partner-sites, for more information on how Google collects and uses such information. If you would like to opt-out of having your site activity available to Google Analytics, you can download the Google Analytics Opt-Out Browser Add-On.

Use of Information

We primarily collect and use your information to provide our website and to respond to your request or otherwise fulfill or meet the reason for which the information is provided to us. For example, if you submit a "Contact Us" form requesting more information on our products, we will use the information you submit to respond to you. To the extent permitted by applicable law, we may also use information that we collect from or about you as follows:

- to contact you about our goods or services that may be of interest to you;
- to notify you about changes to our website or goods we offer;
- to administer and protect our business and this website, including system maintenance, support, reporting and hosting of data;

- to enforce our legal rights and to protect the rights, property, or safety of PTC Alliance, our clients, or others; and/or
- for any other purposes with your consent.

Sharing Your Information

Generally

We may share your information with unaffiliated third parties when necessary to fulfill the purpose for which you provided information to us. We may also provide your information to service providers that support our website or our business. For example, as noted above, our website automatically sends certain information to Google in connection with our use of Google Analytics.

When we need to share data to satisfy a legal or regulatory requirement, including responding to a subpoena or other lawful government request for data, we will share information only as necessary to comply with that requirement. We may also share information if needed to enforce our legal rights, detect or prevent fraud or security concerns, or protect public safety.

If we are involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, personal information held by us about our clients and other users of our website may be among the assets transferred. In addition, we may disclose personal information for the purpose of evaluating and/or performing the proposed transaction (including in connection with any bankruptcy, liquidation or similar proceedings).

Public and De-Identified Data

Any restrictions described in this Privacy Policy do not apply to publicly-available information, aggregated information, or de-identified or anonymized information. We may transfer, disclose or share any publicly-available information or aggregated and/or de-identified information without restriction.

Data Security

We have in place what we believe to be reasonable physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access of, maintain data security for, and correctly use the personal information you provide or that we otherwise collect through our website. However, although such efforts are intended to ensure the confidentiality of your personally identifiable information available to us as a result of your use of our website, we cannot and do not warrant or guarantee the absolute safety and security of your personal information.

Children's Privacy

As noted above, our website is intended for businesses interested in industrial application goods. Our website is <u>not</u> intended for minors under the age of 16 and we do not knowingly collect personal information from children under 16. If we learn that we have collected or received such information, we will delete it. If you believe that we might have information from a child under the age of 16, please contact us as directed below in the "**Contact Us**" section.

Links to Other Sites

For your convenience, we may make available a variety of links to websites that we do not own or operate where you can obtain related products, services, or information. Although we encourage you to consult such websites, we cannot guarantee the prices, terms, quality, reliability, or performance of the products or services provided by the third-party vendors that operate the sites. We are not responsible for the products or services these vendors provide, and when you visit such websites or services, this Privacy Policy does not apply to personal information and other data collected by the third parties. You should consult, read and understand the privacy notices of such third parties before choosing to provide personal information on any such websites or services.

Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact us by phone at 412-299-7900 or by mail at PTC Alliance LLC, Copperleaf Corporate Centre, 6051 Wallace Road Ext., Suite 200, Wexford, PA 15090.