## **Privacy Policy**

T&S Brass and Bronze Works, Inc. ("Company" or "we" or "our" or "us") takes its customers' and website users' ("User" or "you" or "your") on-line security and privacy seriously, so the Company makes reasonable efforts as described below to ensure its Users' confidence and protect their on-line security and privacy. This privacy policy aims to give you information on how we collect and process your personal information and other data through your use of this website or when you use other services provided by the Company (collectively, our "Services") and information on our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- through use of our Services; or
- in email, text, and other electronic messages between you and the Services.

It does not apply to information collected by:

- us offline or through any other means; or
- any third party, including through any application or content (including advertising) that may link or be accessible as a result of your use of our Services.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using our Services, you agree to this privacy policy. This policy may change from time to time. Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## 1. Types of Information Collected.

- a. Traffic Data Collected. The Company automatically tracks and collects the following information when the User visits the Company's websites ("Web Sites"), including the User's: (i) IP address; (ii) domain server; (iii) type of computer; (iv) type of web browser; (v) pages visited and duration; and (vi) search terms used to access the Web Sites (collectively "Traffic Data"). Traffic Data is anonymous information that does not personally identify the User but is helpful in the Company's efforts to improve the User's experience on the Web Site. The Company may also use "cookies," which are small data files that may be stored on the User's computer by the Web Site, and clear gifs, which are tiny graphics that are similar in function to cookies. By using the site, you consent to these cookies.
- b. Personal Information Collected. In order for the User to access certain Services that the Company offers via the Web Sites, the Company requires the User to provide information that personally identifies the User ("Personal Information"). Personal Information may include the following:
  - Identity Data includes names, title, date of birth, and gender.
  - Contact Data includes mailing address, telephone numbers, email address, and other digital contact information.
  - Financial Data includes bank account and payment card details.
  - Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, and feedback and survey responses.
  - Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If the User communicates with the Company by e-mail or completes online registration forms, surveys or other forms, any information provided in such communication also may be collected as Personal Information.

- 2. How We Use Your Personal Information. By providing Personal Information on or through the Web Sites, the User is authorizing the Company to use that Personal Information. The Company uses Personal Information (i) to respond to requests and inquiries, (ii) to send the User information about the Company, including its affiliates, its products or services, and (iii) to otherwise contact the User. The Company may provide User's Personal Information to third parties providing the Company services related to the Web Sites or the services provided through them, solely for the purposes of the services provided by such third party. We do not provide User's Personal Information to third parties for such parties' use in marketing or advertising. Except as described herein and as may be required by court order, other governmental agency order or other official proceeding, the Company does not sell, trade, or otherwise transfer to outside parties Personal Information unless the User provides consent in advance, where such consent must be in writing, which includes by email.
- 3. <u>User Choice Regarding Collection, Use and Distribution of Traffic Data and Personal Information.</u> The User may choose not to allow the use of cookies under Traffic Data. The User's system settings control the use of cookies (not the Company). The User should check whether the User's browser settings allow the User to refuse cookies. If the User does not accept cookies, the User will still have access to some, but not all, of the facilities of the Web Sites.

The User may choose not to provide the Company with any Personal Information. In such an event, the User can still access some of the Web Sites; however, the User will not be able to access and use those portions of the Web Sites that require the User's Personal Information and the Company may not be able to respond to certain inquiries of the User.

- 4. <u>Your California Privacy Rights</u>. California Civil Code Section § 1798.83 permits users of our Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes.
- 5. Your European Privacy Rights. If applicable, you may have rights under European and other laws to have access to your personal information and to ask us to rectify, erase, and restrict use of your personal information. You may also have rights to object to your personal information being used, to ask for the transfer of personal information you have made available to us and to withdraw consent to the use of your personal information. Further information on how to exercise your rights is set out below.

We will honor your rights under applicable data protection laws. You have the following rights under European laws, and may have similar rights under the laws of other countries.

- Right of subject access: The right to make a written request for details of your personal information and a copy of that personal information.
- Right to rectification: The right to have inaccurate information about you corrected or removed.
- Right to erasure ('right to be forgotten'): The right to have certain personal information about you erased.
- Right to restriction of processing: The right to request that your personal information is only used for restricted purposes.

- Right to opt out of marketing: You can manage your marketing preferences by unsubscribe links found in the communications you receive from us or by visiting the applicable preference center.
- Right to object: The right to object to processing of your personal information in cases where our processing is based on the performance of a task carried out in the public interest or we have let you know the processing is necessary for our or a third party's legitimate interests.
- Right to data portability: The right to ask for the personal information you have made available to us to be transferred to you or a third party in machine-readable format.
- Right to withdraw consent: The right to withdraw any consent you have previously given us to handle your personal information. If you withdraw your consent, this will not affect the lawfulness of our use of your Personal Information prior to the withdrawal of your consent.

These rights are not absolute and they do not always apply in all cases. In response to a request, we will ask you to verify your identity if we need to, and to provide information that helps us to understand your request better. If we do not comply with your request, whether in whole or in part, we will explain why.

**Requests and Inquiries About User Personal Information**. You may have any Personal Information submitted to Company through the Web Sites removed or modified by sending the Company notice of such request through the following link <a href="mailto:personaldatainquiry@tsbrass.com">personaldatainquiry@tsbrass.com</a> or by sending a written request to the following address:

T&S Brass and Bronze Works, Inc. Attn: Data Security Manager P.O. Box 1088 Travelers Rest, SC 29690

Email address: personaldatainquiry@tsbrass.com

The request must provide the User's name and the information to be deleted or the modifications to be made. You must include either a telephone number of an email address for the Company's use in the event of any questions on the instructions provided by the User. Notwithstanding the foregoing, the Company may retain Personal Information to the extent required to comply with applicable regulations or other applicable law.

- 7. <u>Data Retention</u>. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.
- **8.** <u>Data Security.</u> We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to

or through our Services. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained within the Services. In addition, we have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. If you would like to know more about our data transfer practices or data security measures, please send an email to personaldatainquiry@tsbrass.com.

- 9. <u>Consent to Transfer Information to the United States.</u> The Web Site is operated in the United States. If the User is located in the European Union, Canada or elsewhere outside of the United States, please be aware that information the Company collects will be transferred to and processed in the United States. By using the Web Sites or providing the Company with any information, the User consents to this transfer and processing of his or her information in the United States.
- 10. <u>Links, Downloads and User Privacy</u>. The Web Sites may contain links to other web sites or forms for download and use. The Company is not responsible for the privacy practices or the content of web sites served by the links and in providing the link the Company does not imply any endorsement, recommendation or approval of such sites. Furthermore, the Company is not responsible for the privacy practices of any third party to which User submits any forms containing User's information. The User accessing any such site or using any forms does so entirely at the User's own risk.
- 11. <u>Children's Privacy</u>. Company does not knowingly collect personally identifying information through the Web Sites from online visitors under 13 years of age. No one under age 13 should provide any Personal Information to or through any of the Services. If you are under 13, do not use our Services or provide any information to or through our Services. If we learn we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at <u>personaldatainquiry@tsbrass.com</u>.
- **Business Transition.** In the event the Company experiences a business transition, such as a merger, acquisition by another company, sale of all or a portion of its assets, or bankruptcy, the User's Personal Information will likely be among the assets transferred. The User's submission of his or her Personal Information is deemed agreement to this potential future transfer.
- 13. <u>Updates and Changes to the Privacy Policy</u>. The Company reserves the right, at any time, to change this Privacy Policy, simply by posting a changed Privacy Policy on this Web Site. The User is responsible to check this Privacy Policy when it uses the Web Sites for any such changes to the Privacy Policy.

Effective Date: June 19, 2018