

Steel Dynamics Privacy Notice

Steel Dynamics, Inc. and its subsidiaries (collectively, “Steel Dynamics,” “we,” “us,” or “our”) are committed to protecting the privacy of your information. The following Privacy Notice (“Notice”) sets forth our policies and practices regarding how we use and share the information we collect through your navigation of our websites (collectively, the "Site").

Effective Date

This Privacy Notice is effective as of 07/21/2020.

Scope

This Notice applies to the websites of Steel Dynamics, Inc. and each of its subsidiaries, which are listed below. This Notice applies regardless of the medium in which the Site is accessed by a user (e.g., via a web or mobile browser). **In the event that a Steel Dynamics, Inc. subsidiary posts a privacy notice on its website that is inconsistent or in conflict with this Notice, then the terms of that privacy notice will prevail and govern to the extent of the inconsistency or conflict in connection with the use of the subsidiary’s website.**

Subsidiary	Website
New Millennium Building Systems, LLC	www.newmill.com
OmniSource, LLC	www.omnisource.com
Vulcan Threaded Products, Inc.	www.vulc.com
SWVA, Inc.	www.swvainc.com
SDI La Farga, LLC.	www.sdilafarga.com
Roanoke Electric Steel Corporation	www.roanokesteel.com

Personal Data We Process

We process the Personal Data we collect from you when you use the Site. “Personal Data” means any information that directly or indirectly relates to you.

We process the following categories of Personal Data:

- **Contact Information**, including your first and last name, mailing address, email address, telephone number, and the name of your company.
- **Account Information**, such as the username and password you create when you register an online account with our Scrap Information Portal.
- **Communication Information**, such as the contents of the communications you send to us by submitting an online form using the Site.
- **Resume Information**, such as details about your education, employment history, salary history, and other information you may provide when you apply for a job with our company using the Site.

- **Log Data**, which includes information that your browser sends whenever you visit a website. This Log Data may include your Internet Protocol address, browser type and settings, the date and time of your request, how you used the Site, and cookie data.
- **Device Information**, which is information about the device you are using to access the Site, including what type of device it is, what operating system you are using, device settings, unique device identifiers, and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings. For example, different types of information are available depending on whether you're using a Mac or a PC, or an iPhone or Android phone. To learn more about what information your device makes available to us, please check the policies of your device manufacturer or software provider.

We collect Personal Data through:

- Direct interactions with you, such as when you voluntarily provide your information to us by contacting us, completing online forms, registering an online account, placing an order, subscribing to our newsletters, applying for a job, or otherwise engaging with our Site.
- Cookies, web beacons, and other automated tracking technologies, such as when you navigate the Site or click on links in the emails we send you. A cookie is a small data file that is transferred to a web browser, allowing our Site to remember and customize your subsequent visits. When we use cookies, we may use "session" cookies (that last until you close your browser) or "persistent" cookies (that last until you or your browser delete them). For example, we may use cookies to store your language preferences or other settings so you don't have to set them up every time you visit the Site. A web beacon (also called a "pixel tag" or "clear GIF") is a piece of computer code that enables us to monitor user activity and website traffic. To learn more about cookies and web beacons, please visit <http://www.allaboutcookies.org>.
- Automatic means, such as when our servers automatically record Log Data about your visit to the Site.

How We Use Your Personal Data

We use your Personal Data to deliver our Site and related services to you, comply with applicable law, and improve your experience of the Site. For example, we use your Personal Data for the following purposes and on the following bases:

- Addressing your comments, inquiries, complaints, and requests; facilitating the transactions you request; providing you with quotes for our services; and notifying you of important information, including updates regarding this Notice, our Terms of Use, your account, our company, and our products and services.
- Providing you with the products and services you have ordered and communicating with you regarding your request or transaction.
- Processing your application for a job or internship with our company.
- Sending you marketing communications, because it is in our legitimate interest to inform you about our products and services that may be of interest to you. We will only use your information for marketing purposes pursuant to your legal consent.

- Performing website traffic analysis and usage analytics. We do this to better understand your preferences with respect to the Site, which will allow us to improve your user experience.

How We Share Your Personal Data

We may share your Personal Data with the following categories of third parties:

- Third-party service providers and suppliers who need access to Personal Data to assist us with delivering the Site and related services to you. For example, such third parties include payment processors; information technology service providers; job recruiting platforms; website hosting providers; marketing, accounting, shipping, and delivery vendors; and other business process outsourcing providers. We share only the minimum amount of Personal Data with these service providers that they need to perform their tasks.
- Third-party service providers who need access to Personal Data to perform website usage analytics and targeted advertising.
- Our corporate affiliates, when necessary to complete the processing activities described above.
- Public and governmental authorities that regulate or have jurisdiction over Steel Dynamics, such as regulatory authorities, law enforcement, public bodies, and judicial bodies.
- Other third parties, as reasonably necessary:
 - In relation to a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other change of ownership or control (whether in whole or in part);
 - To: (i) comply with laws applicable to Steel Dynamics, a request from law enforcement, a regulatory agency, or other legal process; (ii) protect the legitimate rights, privacy, property, interests or safety of Steel Dynamics, our customers, business partners, personnel, or the general public; (iii) pursue available remedies or limit damages; (iv) enforce our Terms of Use; or (v) respond to an emergency;
 - To establish, exercise, or defend our legal rights; and
 - To prevent fraud and reduce credit risk.

Advertising and Analytics Services Provided by Third Parties

We may allow others to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links you clicked, and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Site, and better understand your online preferences. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit the Digital Advertising Alliance at www.aboutads.info/choices.

The third-party service providers we use for advertising and analytics include, but are not limited to:

- *Google.* Google Analytics, a web analysis service provided by Google, uses cookies to collect information such as how often users visit the Site, what they view on the Site, and which websites they visited before coming to the Site. In addition, Google AdWords and Google DoubleClick use cookies to serve targeted ads based on your visits to the Site. Google's ability to use and share information it collects about your visits to the Site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). To opt-out of Google Analytics, you may disable cookies on your browser or install the [Google Analytics Opt-Out Browser Ad-On](#). To opt-out of DoubleClick's advertising services, you may visit [Google Ads Settings](#).
- *Simpli.fi.* Simpli.fi uses cookies to serve targeted ads based on your visits to the Site. Simpli.fi's ability to use and share information it collects about your visits to the Site is restricted by its [Simpli.fi Privacy Policy](#).
- *Act-On.* Act-On uses a beacon tracker to help us understand the activities you perform on the Site. Act-On's ability to use and share information it collects about your visits to the Site is restricted by its [Act-On's Privacy Policy](#).

Data Security

The security of your information is important to us. We have implemented reasonable technical, physical and administrative security measures intended to protect your Personal Data from unauthorized access, disclosure, alteration or destruction. Please keep in mind, however, that no data transmitted over the Internet is 100% secure and any information disclosed online can potentially be collected and used by persons other than the intended recipient. Accordingly, we cannot guarantee or warrant the security of any information you transmit using the Site.

If you would like to learn more about how we protect your Personal Data, you may contact us at the information we provide below.

Marketing

To opt-out of receiving marketing communications from us, please click the unsubscribe link at the bottom of a marketing email or let us know by reaching us at the contact information below. Please note that even if we stop all marketing communications, you may still receive administrative, legal, and other important communications from us.

Children's Privacy

We do not market to and do not knowingly collect any Personal Data from or about a child under the age of 13 without the consent of the child's parent or legal guardian.

Third-Party Links

The Site may contain links to websites not affiliated with us. Your use of an external website or any informational content found on an external website is subject to and governed by the privacy policies, terms, and conditions of that website. We do not endorse or make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available on an external website, even if one or more pages

of the external website are framed within a page of our Site. Further, we are not responsible for the privacy practices of any external Site.

Your California Privacy Rights

California residents have a legal right to request businesses to tell them how their Personal Data has been shared, if at all, with third parties for the third parties' direct marketing purposes. To make such a request, please reach us at the contact information listed below.

Do Not Track

Certain web browsers and other devices you may use to access the Site may permit you to submit your preference that you do not wish to be "tracked" online. We do not currently commit to responding to these submissions, in part, because no common industry standard for "do not track" has been adopted by industry groups, technology companies, or regulators. We will make efforts to monitor developments around Do Not Track browser technology and the implementation of a standard.

Notice to Residents of Countries Outside of the United States

Steel Dynamics makes no claims that the Site and its contents are appropriate for use outside of the United States. If you access this website from outside the United States, you do so at your own risk and are responsible for compliance with the laws of your jurisdiction. If you visit the Site, conduct business with us online, or otherwise contact us from outside of the United States, please be advised that (i) any information you provide to us or that we automatically collect will be transferred to and processed in the United States or in other countries where our affiliates or vendors are located; and (ii) that by using our online services or submitting your information, including Personal Information, you explicitly authorize transfer of such information to and subsequent processing in the United States in accordance with United States law and this Privacy Notice.

Updates to the Privacy Notice

We may periodically revise the Privacy Notice in our sole and absolute discretion to reflect changes in the law or our business practices. If we revise the Privacy Policy, we will post the updated Privacy Notice on our website. Changes to the Privacy Notice will become effective and will apply to the information collected starting on the date we post the revised Privacy Notice.