

# Privacy Policy

LAST UPDATED: January 20, 2021

Simpson Manufacturing Company, Inc. and its affiliates (collectively, the "**Company**," "**we**," or "**us**") understand and respect your concerns about privacy. We want you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect through:

- Websites operated by us from which you are accessing this Privacy Policy (the "**Websites**");
- Software applications made available by us for use on or through computers and mobile devices, such as Company-branded software applications that we provide directly to homeowners and professional builders (the "**Apps**");
- Our social media pages and apps located at such sites (collectively, our "**Social Media Pages**"); and
- Offline and online business interactions you have with us.

Collectively, we refer to the Websites, Apps, Social Media Pages, and offline and online business interactions as the "**Services**."

## PERSONAL INFORMATION

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"**Personal Information**" is information that identifies you as an individual or relates to an identifiable individual, such as:

- Name
- Postal address
- Email address
- Telephone number
- Password
- Social media handles
- IP address

### Collection of Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Services**
  - We collect Personal Information through the Services, for example, when you create a user account, register for and use our Apps, sign up to receive literature or electronic communications, submit an order, contact us with a support request, participate in customer forums and training, submit surveys, or enter contests or other promotions.
- **Offline**
  - We collect Personal Information from you offline, e.g., when you visit our facilities, contact us on the phone, or attend our live or virtual events, such as trade shows.

- **From Other Sources**

- We receive your Personal Information from other sources, for example, our strategic partners, when they share the information with us.

We need to collect Personal Information in order to provide the requested Services to you..

If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

### **Use of Personal Information**

We and our service providers use Personal Information for legitimate business purposes including:

- **Providing the functionality of the Services and fulfilling your requests**

- To provide the Services' functionality to you, such as arranging access to your registered account, and providing you with related customer service
- To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for or other information about our products and offerings
- To supply any products, literature, or services you have requested, and provide you with related customer service
- To complete your transactions, and provide you with related customer service
- To send administrative information to you, such as changes to our terms, conditions and policies

We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

- **Providing you with our newsletter and/or other marketing materials and facilitating social sharing**

- To send you marketing related emails, with information about our services, new products and other news about our company
- To facilitate social sharing functionality that you choose to use

We will engage in this activity with your consent or where we have a legitimate interest.

- **Analysis of Personal Information for business reporting and providing personalized services**

- To analyze or predict our users' preferences in order to prepare aggregated trend reports on how our Services and digital content are used, so we can improve our Services
- To better understand you, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests
- To better understand your preferences so that we can deliver content via our Services that we believe will be relevant and interesting to you

We will provide personalized services based on our legitimate interests, and with your consent to the extent required by applicable law.

- **Allowing you to participate in surveys, contests, or other promotions**
  - We may offer you the opportunity to participate in a survey or other promotion.
  - Some of these promotions have additional rules containing information about how we will use and disclose your Personal Information.

We use this information to manage our contractual relationship with you.

- **Aggregating and/or anonymizing Personal Information.**
  - We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.
- **Accomplishing our business purposes.**
  - For data analysis, for example, to improve the efficiency of our Services and to analyze market trends
  - For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements
  - For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft
  - For developing new products and services
  - For enhancing, improving, or modifying our current products and services
  - For identifying usage trends, for example, understanding which parts of our Services are of most interest to users
  - For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users
  - For operating and expanding our business activities, for example, understanding which parts of our Services are of most interest to our users so we can focus our energies on meeting our users' interests
  - For providing user requested training on our products and services

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

### **Disclosure of Personal Information**

We disclose Personal Information:

- **To our affiliates for the purposes described in this Privacy Policy.**
  - You can consult the list and location of our affiliates here:  
<https://www.sec.gov/Archives/edgar/data/920371/000092037120000054/exhibit21-listofsubsid.htm>.
- **To our third party service providers, to facilitate services they provide to us.**
  - These can include providers of services such as website hosting, data analysis, order fulfillment, marketing of our products and Services, managing and delivering email

communications, information technology and related infrastructure provision, customer service, auditing, and other services.

- **To third parties, to permit them to send you marketing communications, consistent with your choices.**
- **To third-party sponsors of surveys, contests, and similar promotions.**
  - Some of these activities may have rules that contain additional information about how we collect, use, and disclose Personal Information in connection with the activity, so please read the rules before choosing to participate.

### **Other Uses and Disclosures**

We also use and disclose your Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- **To comply with applicable law and regulations.**
  - This can include laws outside your country of residence.
- **To cooperate with public and government authorities.**
  - To respond to a request or to provide information we believe in good faith is necessary
  - These can include authorities outside your country of residence.
- **To cooperate with law enforcement.**
  - For example, when we respond to law enforcement requests and orders or provide information we believe in good faith is necessary
- **For other legal reasons.**
  - To enforce our terms and conditions; and
  - To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- **In connection with a sale or business transaction.**
  - We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

### **OTHER INFORMATION**

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"**Other Information**" is any information that does not reveal your specific identity or does not directly relate to an identifiable individual such as:

- Browser and device information
- App and Website usage data
- Design details submitted through use of our Apps
- Information collected through cookies, web beacons, and other technologies
- IP address

- Information that has been aggregated in a manner such that it no longer reveals your specific identity

If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Policy.

### **Collection of Other Information**

We and our service providers may collect Other Information in a variety of ways, including:

- **Through your browser or device:**
  - Certain information is collected by most browsers or automatically through your device, such as your IP address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly.
- **Through your use of the Apps**
  - When you download and use an App, we and our service providers may track and collect usage data, such as the date and time the App on your device accesses our servers, your traffic patterns, and what information and files have been downloaded to the App based on your IP address.
- **Using cookies**
  - Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other traffic data. We and our service providers use the information for security purposes, to facilitate navigation and reduce the frequency with which you will need to enter your password, to display information more effectively, and to personalize your experience. We do not currently respond to browser do-not-track signals. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services and may not be able to install or use certain of our Apps.
- **Using web beacons and other similar technologies**
  - Web beacons (also known as pixel tags and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.  
**Analytics.** We use Google Analytics which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding your use of other websites, apps and online resources. You can learn about Google's practices by going to [google.com/policies/privacy/partners](https://google.com/policies/privacy/partners), and exercise the opt out provided by Google by

downloading the Google Analytics opt-out browser add-on, available at [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

We use Facebook pixels, LinkedIn Insight Tag, FullStory and Pardot, all of which use cookies and similar technologies to collect and analyze additional activities and trends. You can learn about these practices at [facebook.com/about/privacy/update](https://facebook.com/about/privacy/update), [linkedin.com/legal/cookie-policy](https://linkedin.com/legal/cookie-policy), [fullstory.com/optout](https://fullstory.com/optout), and [pardot.com/legal/permission-based-marketing-policy](https://pardot.com/legal/permission-based-marketing-policy).

- **IP Address**
  - Your IP address is automatically assigned to your computer by your internet service provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Services.
  
- **Physical Location**
  - We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device's physical location to provide you with personalized location-based services and content. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you do, we may not be able to provide you with the applicable personalized services and content.

## **Uses and Disclosures of Other Information**

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

## **SECURITY**

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contacting Us" section below.

## **CHOICES AND ACCESS**

### **Your choices regarding our use and disclosure of your Personal Information**

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt-out from:

- **Receiving electronic communications from us:** If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out by clicking on the opt-out link in an electronic communication from us.
- **Our sharing of your Personal Information with affiliated third parties for their direct marketing purposes.** If you would prefer that we discontinue sharing your Personal Information on a going-forward basis with affiliated third parties for their direct marketing purposes, you may opt out of this sharing by emailing [DataPrivacy\\_Simpson@strongtie.com](mailto:DataPrivacy_Simpson@strongtie.com).
- **Our sharing of your Personal Information with unaffiliated third parties for their direct marketing purposes.** If you would prefer that we discontinue sharing your Personal Information on a going-forward basis with unaffiliated third parties for their direct marketing purposes, you may opt out of this sharing by emailing [DataPrivacy\\_Simpson@strongtie.com](mailto:DataPrivacy_Simpson@strongtie.com).

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

### **How you can access, change or delete your Personal Information**

If you would like to request to review, correct, update, suppress, restrict or delete Personal Information, object to the processing of Personal Information, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), you may submit your request by email or postal mail at the addresses provided in the "Contacting Us" section below. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed or whether you would like to have your Personal Information suppressed from our database. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase or promotion).

### **RETENTION PERIOD**

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We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);

- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

### **THIRD-PARTY SERVICES**

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This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service which link to the Services or to which the Services link. The inclusion of a link to or on the Services does not imply endorsement of the linking or linked site or service by us or by our affiliates.

In certain cases, we may provide and operate software applications on behalf of other companies, or permit other companies to integrate our software applications into their own services. This Privacy Policy does not apply to information collected by or on behalf of these other companies.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

### **THIRD PARTY ADVERTISING**

We may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or online services.

- You may receive advertisements based on information relating to your access to and use of the Services and other websites or online services on any of your devices, as well as on information received from third parties. These companies place or recognize a unique cookie on your browser (including through the use of pixel tags). They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#/>. You may download the AppChoices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices) to opt out in mobile apps.

### **USE OF SERVICES BY MINORS**

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The Services are not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under 16.

### **SENSITIVE INFORMATION**

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Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political



opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services or otherwise to us.

## **UPDATES TO THIS PRIVACY POLICY**

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The "LAST UPDATED" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services. Your use of the Services following these changes means that you accept the revised Privacy Policy.

## **CONTACTING US**

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Simpson Strong-Tie Company Inc., located at 5956 W. Las Positas Blvd, Pleasanton, CA 94588, is the company responsible for collection, use and disclosure of your Personal Information under this Privacy Policy.

If you have any questions about this Privacy Policy or our privacy practices, please contact us at [DataPrivacy\\_Simpson@strongtie.com](mailto:DataPrivacy_Simpson@strongtie.com)

## **JURISDICTION AND CROSS-BORDER TRANSFER**

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Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these "specified countries" is available at: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)). The UK recognizes the EEA and the specified countries as providing an adequate level of data protection according to UK standards. For transfers from the EEA or the UK to countries not considered adequate by the European Commission or the UK government (as applicable), we have put in place adequate measures where necessary, such as standard contractual clauses adopted by the relevant authority to protect your Personal Information. You may obtain a copy of these measures by contacting in accordance with the "Contacting Us" section below.

## **ADDITIONAL INFORMATION REGARDING THE EEA AND THE UK**

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- You may also contact our Data Security Lead (DSL) responsible for your country or region, if applicable. For a list of DSLs, please email [DataPrivacy\\_Simpson@strongtie.com](mailto:DataPrivacy_Simpson@strongtie.com).
- You may lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs. A list of EEA data protection authorities is available at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080). Information about the UK data protection authority is available here: <https://ico.org.uk/>.

## ADDITIONAL INFORMATION REGARDING CALIFORNIA

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Pursuant to the California Consumer Privacy Act of 2018 (“**CCPA**”), we are providing the following details regarding the categories of Personal Information that we collect, use and disclose about California residents. This CCPA section does not apply to our job applicants, employees, contractors, owners, directors, or officers where the Personal Information we collect about those individuals relates to their current, former, or potential role with us. Under the CCPA, “**Personal Information**” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household.

### Collection and Disclosure of Personal Information

The following chart details which categories of Personal Information about California residents we plan to collect, as well as which categories of Personal Information we have collected and disclosed for our operational business purposes in the preceding 12 months.

<b>Categories of Personal Information</b>	<b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b>
Identifiers, such as name, contact information, IP address and other online identifiers	Our affiliates; trusted third-party service providers; third parties, to permit them to send you marketing communications, consistent with your choices.
Personal information, as defined in the California customer records law, such as name, and contact information	Our affiliates; trusted third-party service providers; third parties, to permit them to send you marketing communications, consistent with your choices.
Characteristics of protected classifications under California or federal law, such as age and gender	Our affiliates; trusted third-party service providers.
Commercial information, such as transaction information and purchase history	Our affiliates; trusted third-party service providers.
Internet or network activity information, such as browsing history and interactions with our website and software applications	Our affiliates; trusted third-party service providers; third parties, to permit them to send you marketing communications, consistent with your choices.
Geolocation data, such as device location and approximate location derived from IP address	Our affiliates; trusted third-party service providers

We collect Personal Information from you, such as when you when you create a user account, submit surveys, or contact us on the phone, and from our strategic partners, as described in detail above in this Privacy Policy, under “*Collection of Personal Information.*”

## **Use of Personal Information**

We use these categories of Personal Information for the purposes of operating, managing, and maintaining our business, providing our products and services, and accomplishing our business purposes and objectives, as described in detail above in this Privacy Policy, under “*Use of Personal Information.*”

We do not sell and have not sold Personal Information in the preceding 12 months, as “sale” is defined in the CCPA. We do not sell the Personal Information of minors under 16 years of age.

## **CCPA Rights and Requests**

If you are a California resident, you may request that we:

- Disclose to you the following information covering the 12 months preceding your request:
  - The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
  - The specific pieces of Personal Information we collected about you;
  - The business or commercial purpose for collecting (if applicable) Personal Information about you; and
  - The categories of Personal Information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information (if applicable).
- Delete Personal Information we collected from you.

To make a request for the disclosures or deletion described above, please contact us at (800) 999-5099 or [DataPrivacy\\_Simpson@strongtie.com](mailto:DataPrivacy_Simpson@strongtie.com). We will verify and respond to your request as described above in “Your Rights and Choices Available to You” and consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as name, email address, and contact information, in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your Personal Information. If you make a deletion request, we may ask you to verify your request before we delete your Personal Information.

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

## **Authorized Agents**

If you want to make a request as an authorized agent on behalf of a California resident, you may use the submission methods noted above. As part of our verification process, we may request that you provide, as applicable, proof concerning your status as an authorized agent, which also may include:

- Proof of your registration with the California Secretary of State to conduct business in California; and/or
- A power of attorney from the California resident pursuant to Probate Code sections 4121-4130;

If you are making a request on behalf of a California resident and have not provided us with a power of attorney from the resident pursuant to Probate Code sections 4121-4130, we may also require the resident to:

- Verify the resident's own identity directly with us; or
- Directly confirm with us that the resident provided you permission to submit the request.