

PRIVACY POLICY

Edgen Murray (“**Company**” or “**We**”) understands that your privacy is important to you and that you care about how your personal data is used. Edgen Murray respects and values the privacy of all of our Customers and Suppliers and will only collect and use personal data in ways that are described below, and in a manner that is consistent with our obligations and your rights under the law.

This Privacy Policy explains how Edgen Murray collects, holds, processes and uses your personal data. It also explains your rights under the law relating to your personal data.

Part 1 – Definition of “Personal Data”

Personal data is defined by EU General Data Protection Regulation (GDPR) as “any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name, phone number, address, and other contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we use is set out in Part 3, below.

Part 2 – Your Rights Under GDPR

Under the GDPR, you have certain rights, which we have described below:

- a. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 9.
- b. The right to access the personal data we hold about you. Part 8 will tell you how to do this.
- c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 9 to find out more.
- d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 9 to find out more.
- e. The right to restrict/prevent the processing of your personal data.
- f. The right to object to us using your personal data for a particular purpose or purposes.
- g. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h. Rights relating to automated decision-making and profiling. We do not use your personal data in this way. For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 9.

Further information about your rights can also be obtained from your local Citizens Advice Bureau. If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

Part 3 – Personal Data We Collect; Automatic Data Collection Technologies

We may collect some or all of the following personal data about you (this may vary according to your relationship with Edgen Murray, e.g. supplier or customer):

- Name
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession
- Recruitment Data
- Payment information
- Details of our interactions and correspondence with you, e.g. e-mails, meeting notes etc.

We also collect statistical data on our website, utilizing automatic data collection technologies, that does not include your personal data, but we may maintain or associate such statistical data with your personal data that we collect in other ways or receive from third parties. This helps us to improve our website and deliver a better and more personalised service.

The technologies we use for auto data collection on our website may include:

Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our website.

Flash Cookies. Certain features of our website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of our website may then be inaccessible or not function properly.

Part 4 – How We Use Your Personal Data

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one or more of the following purposes:

- Providing and managing your account.
- Supplying our products and services to you or fulfilling any contracts we have with you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for your business.
- Communicating with you. This may include responding to emails or calls from you.

- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting our Data Protection personnel as provided in Part 9).

In addition, with your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone or post with information, and news on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and you will always have the opportunity to opt-out.

Finally, we use the information collected from or provided by you on our website to present our website and its contents to you; provide you with information, products or services that you request from us; or fulfil any other purpose for which you provide it.

Part 5 – Disclosure of Your Information

In some limited circumstances, we may disclose personal information that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To fulfil the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Edgen Murray, our customers, or others.

Part 6 – Retention By Us of Your Personal Data

We will not retain your personal data for any longer than is necessary to fulfil the purpose for which it was first provided by you or collected by us. Your personal data will therefore be kept in line with our Data Retention Policy.

Part 7 – Where We Maintain Your Personal Data

We may store your personal data outside your home location and/or the European Economic Area (EEA). We have implemented measures to ensure your personal data is held within GDPR guidelines regardless of where it is stored.

Part 8 – Obtaining Access to Your Personal Data

If you want information concerning personal data we have about you, you can ask us for details of that personal data and for a copy of it and where any such personal data is held. Requests by you for such information (a subject access request) should be made in writing and sent to us at the email or postal addresses shown in Part 9. There is not normally any charge for a subject access request. If your request is “manifestly unfounded or excessive” (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding. We will respond to your subject access request as soon as reasonably possibly and, in any case, not more than 30 days of receiving your request.

Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required, up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress during the time we are assembling our response.

Part 9 – Our Contact Information

To contact us about anything to do with your personal data and data protection, including to make a subject access request or to update your data, please use the following details, for the attention of GDPR Email:

E-mail address: privacy@edgenmurray.com
Address: Edgen Murray Europe Ltd,
Attention: Data Protection
Newbridge Industrial Estate,
Newbridge,
Edinburgh, EH28 8PJ.

Part 10 – Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available on our website at www.edgenmurray.com. You are responsible for periodically visiting our website and this privacy policy to check for any changes