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Your privacy is critically important to us.

Amsteel, LLC (“us”, “we”, or “our”) operates the <https://amsteel.llc> website (the “Service”).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <https://amsteel.llc>.

In general, you may visit many pages of the Service without telling us who you are or revealing any personal information about yourself. We may track the Internet domain address from which people visit the Service and analyze this data for trends and statistics, but individual users will remain anonymous unless they voluntarily tell us who they are.

## Definitions

### SERVICE

Service is the <https://amsteel.llc> website operated by Amsteel, LLC.

### PERSONAL DATA

Personal Data means data about a living individual who can be identified from that data (or from those and other information either in our possession or likely to come into our possession).

## **USAGE DATA**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

## **COOKIES**

Cookies are small pieces of data stored on your device (computer or mobile device).

## **DATA CONTROLLER**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

## **DATA PROCESSORS (OR SERVICE PROVIDERS)**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

## **DATA SUBJECT (OR USER)**

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

## **INFORMATION COLLECTION AND USE**

We collect several different types of information for various purposes to provide and improve our Service to you.

# Types of Data Collected

## *PERSONAL DATA*

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. You may opt-out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

## *USAGE DATA*

We may also collect information on how the Service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## *TRACKING COOKIES DATA*

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with a small amount of data that may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and

scripts to collect and track information and to improve and analyze our Service.

Cookies store information that a website may need in order to personalize your experience and gather website statistical data. Any time you visit the Service to browse or to read or download information, we collect and store the name of the domain and host from which you access the Internet (for example, msn.com, aol.com, etc.); the Internet protocol (IP) address of the computer you are using; the browser software you use and your operating system; the date and time you access the Service; and the Internet address of the website from which you linked directly to the Service. We use this information to measure the number of visitors to areas of the Service and to help us make the Service more useful and interesting to our visitors. We use information from cookies in the aggregate to analyze for trends and statistics, and then discard it—we do not track individuals, only instances of entry to the Service.

Some consumers may not know that cookies are being placed on their computers when they visit websites. If you want to know when this happens or to prevent it from happening, you can set your browser to advise you when a website attempts to place a cookie on your computer.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

## EXAMPLES OF COOKIES WE USE:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

- Advertising Cookies. Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

## Use of Data

### Amsteel, LLC USES THE COLLECTED DATA FOR VARIOUS PURPOSES:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers, and general information about other goods, services, and events that we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

## SAFE HARBOR

We adhere to the U.S. safe harbor policy privacy principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.

Accordingly, our transfer of your Personal Data to non-European Union nations that do not meet the stringent European Union “adequacy” standard for privacy protection is prohibited, and we will not transfer your Personal Data to any such nation. If you have any questions regarding this policy, please contact us through the Service.

## Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Amsteel, LLC legal basis for collecting and using the personal information described in this Privacy

Policy depends on the Personal Data we collect and the specific context in which we collect it.

## **Amsteel, LLC MAY PROCESS YOUR PERSONAL DATA BECAUSE:**

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

## **RETENTION OF DATA**

Amsteel, LLC will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Amsteel, LLC will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **TRANSFER OF DATA**

Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Amsteel, LLC will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **DISCLOSURE OF DATA**

We will share your Personal Data with our partners and with third-party independent contractors for purposes of: (1) performing functions on behalf of Amsteel, LLC, such as processing credit card transactions; (2) providing you with product offers via e-mail or postal mail; (3) tracking information generated through the Service; and (4) coordinating with third-party independent contractors to provide you with features of packages you order and purchase through the Service. Our partners and third-party independent contractors are obligated contractually not to use or share your personal information for unauthorized purposes.

## **BUSINESS TRANSACTION**

If Amsteel, LLC is involved in a merger, acquisition, or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

## **DISCLOSURE FOR LAW ENFORCEMENT**

Under certain circumstances, Amsteel, LLC may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency). Specifically, we may disclose your Personal Data, Usage Data, and Cookies Data to comply with a court order, subpoena, search warrant, or another legal process; to comply

with legal, regulatory, or administrative requirements of any governmental authorities; and to protect and defend us, and our subsidiaries and affiliates, and each of our/their officers, directors, employees, attorneys, agents, contractors, and partners, in connection with any legal action, claim, or dispute.

## LEGAL REQUIREMENTS

Amsteel, LLC may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Human Focus Digital
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability
- To enforce the Terms and Conditions of Use (our website Terms of Use) of the Service
- To prevent imminent physical harm
- To take necessary and appropriate action, in the event that we find that your actions in relation to the Service violate any laws, our Terms, and Conditions of Use, or any of our usage guidelines for specific products or services.

## Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security, and we do not assume any responsibility for such security.

## “DO NOT TRACK” SIGNALS

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.



You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **YOUR DATA PROTECTION RIGHTS UNDER GENERAL DATA PROTECTION REGULATION (GDPR)**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights, Amsteel, LLC aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

### **THE RIGHT TO ACCESS, UPDATE, OR TO DELETE THE INFORMATION WE HAVE ON YOU.**

Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

### **THE RIGHT OF RECTIFICATION.**

You have the right to have your information rectified if that information is inaccurate or incomplete.

### **THE RIGHT TO OBJECT.**

You have the right to object to our processing of your Personal Data.

### **THE RIGHT OF RESTRICTION.**

You have the right to request that we restrict the processing of your personal information.

### **THE RIGHT TO DATA PORTABILITY.**

You have the right to be provided with a copy of the information we have on you in a structured, machine-readable, and commonly used format.

## **THE RIGHT TO WITHDRAW CONSENT.**

You also have the right to withdraw your consent at any time where Human Focus Digital relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## **SERVICE PROVIDERS**

We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services, or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **ANALYTICS**

We may use third-party Service Providers to monitor and analyze the use of our Service.

## **GOOGLE ANALYTICS**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google

may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page:

<http://www.google.com/intl/en/policies/privacy/>

## **ADVERTISING**

We may use third-party Service Providers to show advertisements to you to help support and maintain our Service.

## **GOOGLE ADSENSE DOUBLECLICK COOKIE**

Google, as a third-party vendor, uses cookies to serve ads on our Service. Google's use of the DoubleClick cookie enables it and its partners to serve ads to our users based on their visit to our Service or other websites on the Internet.

You may opt-out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page:

<http://www.google.com/ads/preferences/>

## **BEHAVIORAL REMARKETING**

Amsteel, LLC may use remarketing services to advertise on third-party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

## GOOGLE ADWORDS

Google AdWords remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page:

<http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page:

<http://www.google.com/intl/en/policies/privacy/>

## FACEBOOK

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/516147308587266/>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe

<http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

## PAYMENTS

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express, and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

## THIRD-PARTY HOSTING

We contract with a third party to maintain and host the Service. Therefore, any information you submit, including personal information, will be placed and stored on a computer server maintained by this third-party host. The third-party has agreed to implement technology and security features and strict policy guidelines to safeguard the privacy of your personal information from unauthorized access or improper use.

## SITE TECHNOLOGIES

We do not provide the technologies used to build the Service, and therefore we neither recommend nor endorse the same. Any information regarding identified technologies, including their capabilities, limitations, and

applications, should be sought directly from their manufacturers. Human Focus Digital hereby disclaims any rights to trademarks, service marks, trade names, logos, copyrights, patents, domain names, or other intellectual property interests of third parties that are not intellectual property interests of Amsteel, LLC.

## LINKS TO OTHER SITES

Our Service may contain links to other sites that are not operated by us. These links are an accommodation to the respective third-party site owners and for your convenience. Sites linked to and from the Service are not necessarily under the control of Human Focus Digital you should read and understand Amsteel, LLC with respect to such third-party links, as stated in the Terms and Conditions of Use (Terms of Use) of the Service. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy and Terms and Conditions of Use of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party websites, sites, or services.

## CHILDREN'S ONLINE PRIVACY PROTECTION ACT

Amsteel, LLC is intended for general audiences and is not directed to children under 13 years of age. No one under the age of 13 should provide any personal information, and Amsteel, LLC does not knowingly collect personally identifiable information from children under 13. If a child has provided us with personally identifiable information, a parent or guardian of that child may send an email message to with "Request for Child Information Removal" on the subject line and the name and age of the child in the body of the message. We will then terminate the applicable account and make reasonable efforts to delete the child's information from our database. If you are under the age of 18, you may only use the Service in conjunction with, and under the constant

supervision and consent of, your parents or guardians. But in NO case do we want nor solicit any personal information from any children under the age of thirteen (13) years old. In certain other countries, there are higher legal minimums for using a website unsupervised – in those countries, the higher legal limits apply.

## Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

YOUR CONTINUED USE OF THE SERVICE FOLLOWING OUR POSTING OF A CHANGE NOTICE WILL CONSTITUTE BINDING ACCEPTANCE OF THOSE CHANGES.

Contact Us

If you have any questions about this Privacy Policy, please contact us at [bids@amsteel.llc](mailto:bids@amsteel.llc).