

PRIVACY POLICY

WWW.PHOENIXTUBE.COM

Phoenix Tube Company, Inc. respects your privacy and the purpose for which our website (www.phoenixtube.com) (“Site”) visitors provide us with information. Phoenix Tube Company, Inc. is concerned about privacy issues and wants you to be familiar with how it collects, uses and discloses information. This Privacy Policy is intended to inform you of Phoenix Tube Company, Inc.’s practices in connection with the limited information it collects through this Site and in connection with the use of certain features of the Site. By accessing or using this Site, you signify that you agree with all of the terms of this Privacy Policy, so please do not access or use this Site if you disagree with any part of this Privacy Policy. This Privacy Policy incorporates and forms part of the Legal Notices – Terms of Use applicable to this Site, which can be accessed by the “Legal Notices – Terms of Use” link on the Home Page. Please review the Legal Notices – Terms of Use in conjunction with your review of this Privacy Policy.

PERSONAL INFORMATION

Phoenix Tube Company, Inc. does not collect any “Personal Information” of users through the Site. “Personal Information” is information that identifies you as an individual. However, Phoenix Tube Company, Inc. does collect certain Personal Information from individuals and companies who intend to use certain Site features and functions. That Personal Information, which is provided by individuals and companies through other sources, such as email and other forms of oral, written and electronic communication, includes the following:

- Name;
- Postal Address (including billing and shipping addresses);
- Telephone or fax number;
- Email address.

Phoenix Tube Company, Inc. collects the foregoing Personal Information so as to allow individuals and companies to access the features of this Site that allow the user to review current inventory information on standard products, request a quote and review previous quote requests, review the status of pending orders, review the status of shipments, and review test reports for certain products. Not all users will have access to all of the foregoing functions and features. To allow users to access those features of the Site, users will be required to log in by providing their email address (previously provided to Phoenix Tube Company, Inc. through other sources) and a generic password previously provided by Phoenix Tube Company, Inc. Users accessing those features of the Site for the first time will be required to create a personalized password, which will be saved in encrypted form by Phoenix Tube Company, Inc.

USE OF PERSONAL INFORMATION

Phoenix Tube Company, Inc. uses the Personal Information identified above for the following purposes:

- Respond to requests for quotes and review previous quotes;
- To allow you to review current inventory of standard products, the status of orders and shipments;
- Respond to inquiries and fulfill your requests;
- For Phoenix Tube Company, Inc.'s internal business purposes;
- As Phoenix Tube Company, Inc. believes to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public or government authorities; (d) to enforce our Legal Notices – Terms of Use; (e) to protect its operations; (f) to protect its rights, privacy, safety or property, or that of you or others; or (g) to allow us to pursue available remedies or limit the damages we may sustain.

DISCLOSURE OF PERSONAL INFORMATION

Phoenix Tube Company, Inc. does not share, sell, or rent any of the Personal Information it collects in connection with this Site or otherwise. Personal Information may be disclosed:

- To Phoenix Tube Company, Inc.'s third-party providers which provide services such as website hosting, data analysis, IT services and infrastructure, customer service, payment processing, order fulfillment, email delivery, auditing and other similar services;
- To third parties such as agents, distributors and shippers to facilitate the sale, distribution and delivery of Phoenix Tube Company, Inc.'s products;
- To a third party (whether affiliated or unaffiliated with Phoenix Tube Company, Inc.) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Phoenix Tube Company, Inc.'s business, assets or stock (including in connection with any bankruptcy or similar proceeding);
- As Phoenix Tube Company, Inc. believes to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public or government authorities; (d) to enforce our Legal Notices – Terms of Use; (e) to protect its operations; (f) to protect its rights,

privacy, safety or property, or that of you or others; or (g) to allow us to pursue available remedies or limit the damages we may sustain;

- By you, on message boards, blogs and other services to which you are able to post information and materials. Please note that any information you post or disclose through these services will become public information, and may be available to the general public.

NON-PERSONAL INFORMATION

“Non-Personal Information” is any information that does not reveal your specific identity, such as:

- Browser information;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you;
- Aggregated information;
- Zip code.

Phoenix Tube Company, Inc. and its third-party service providers may collect Non-Personal Information in a variety of ways, including:

- **Through your browser:** Most Internet browsers transmit certain information to websites that you visit, such as your computer’s type (Windows or Macintosh) and its Media Access Control (MAC) address and screen resolution, and the type of version of your computer’s Operating System and browser. Phoenix Tube Company, Inc. and its third-party service providers use this information to ensure that the Site functions properly;
- **Using cookies:** Cookies are very small text documents stored directly on the computer that you are using, which often include an anonymous unique identifier. Cookies allow Phoenix Tube Company, Inc. to recognize your computer to assist you with your use of the Site. Cookies may be used to collect information such as language preferences, browser type, time spent on the Site, pages visited and other anonymous traffic data. Phoenix Tube Company, Inc. and its third-party service providers use the information stored on cookies for security purposes, to facilitate navigation, to display information more effectively and to personalize your experience when visiting the Site, as well as for online tracking purposes. Phoenix Tube Company, Inc. also may gather statistical information about the usage of the Site to continually improve its design and functionality, to understand how customers use the Site and to assist Phoenix Tube

Company, Inc. and its third-party service providers with resolving questions regarding the Site.

If you do not want information to be collected through the use of cookies on your computer, there is a simple procedure in most browsers that allows you to automatically decline the transfer of cookies to your computer, or to be given the choice of declining or accepting a particular cookie(s) from a particular website. If cookies are disabled, however, some features of the Site may not operate as intended. Information about procedures to disable cookies can be found on your Internet browser provider's website.

- **Using pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some website pages and HTML-formatted email messages to, among other things, to track the actions of website users and email recipients, measure the success of marketing campaigns and compile statistics about Site usage and response rates.
- **IP Address:** Your "IP Address" is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically into our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many websites. We use IP Addresses for purposes of calculating Site usage levels, helping diagnose server problems and administering the Site.
- **From you:** Information such as your location, as well as other information, such as your company, title, interests and preferred means of communication, is collected when you voluntarily provide this information. Unless combined with Personal Information, such information does not personally identify you or any other user of the Site.

DISCLOSURE OF NON-PERSONAL INFORMATION

Because Non-Personal Information does not personally identify you, we may use and disclose Non-Personal Information for any purpose, unless combined with Personal Information (such as combining your name with geographic location). If we combine any Non-Personal Information with Personal Information, the combined information will be treated by Phoenix Tube Company, Inc. as Personal Information.

SECURITY

Phoenix Tube Company, Inc. uses reasonable organizational, technical and administrative measures to protect Personal Information under its control. Unfortunately, no data transmission over the internet or data storage system can be guaranteed to be 100% secure. Please do not send

sensitive or confidential information to us by email or by any other means in connection with the Site. If you have reason to believe that your communications with us have been compromised in any way, please immediately notify us of the problem by contacting us as provided in the “CONTACTING US” section below.

ACCESS

If you would like to review, correct, update, suppress, delete or otherwise limit Phoenix Tube Company, Inc.’s use of your Personal Information that has previously been provided to Phoenix Tube Company, Inc., you may contact us as provided in the “CONTACTING US” section below. In your request, please make clear what information you would like to have changed, whether you would like to have your Personal Information suppressed from Phoenix Tube Company, Inc.’s database or otherwise let us know what limitations you would like to put on Phoenix Tube Company, Inc.’s use of your Personal Information. We will try to comply with your request as soon as reasonably practicable.

RETENTION PERIOD

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

USE OF SITE BY MINORS

This Site is not directed to individuals under the age of fourteen (14) and request that these individuals do not submit any Personal Information through the Site.

CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in a country where we engage third-party service providers, and by using our Site you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those in your country.

SENSITIVE INFORMATION

We ask that you not send Phoenix Tube Company, Inc., and you not disclose, any sensitive Personal Information (e.g. Social Security numbers, credit card or other payment card information, information relating to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or thought the Site.

CONTACTING US

If you have any questions about this Privacy Policy or need to contact us in accordance with any of the provisions of this Privacy Policy, please contact us by email at support@phoenixtube.com.

Last Updated August 13, 2012

Please note that email communications are not secure; accordingly, please do not include any sensitive or confidential information in your emails to us. Alternatively, you can write to us at our address, which is listed on Contact Us page to this Site.

Last Updated August 13, 2012

UPDATES TO THIS PRIVACY POLICY

Phoenix Tube Company, Inc. reserves the right to change or modify this Privacy Policy. Please review the “LAST UPDATED” legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Site. Your use of the Site following any such changes to this Privacy Policy constitutes your acceptance of the revised Privacy Policy.