

PRIVACY POLICY

OVERVIEW

GS Operating, LLC dba Gexpro Services (“Gexpro Services” or “Company”) knows that you care how information about you is used and shared and we appreciate your trust that we will do so carefully and sensibly. This Privacy Policy covers information collected by us, or provided to us, on various media, including www.gexproservices.com, our LinkedIn™ page or other social media sites, any related mobile websites, advertisements, and applications (collectively, the “Site”), and information we receive over email or telephone, or by our sales representatives (collectively, “Customer Service”). This Privacy Policy also covers information that we may receive from other persons or companies who have received your information and can share it with us. By visiting the Site or communicating with Customer Service, you are accepting the practices described in this Privacy Policy.

TYPES OF INFORMATION WE COLLECT

Our intention is to limit our personal information/personal data collection to only what is needed to perform our obligations and effectively run our Company. The quantity and scope of that information varies by the type of work being undertaken. Accordingly, personal information/personal data collected or received may include but not be limited to:

- General identification and contact information, such as your name, address, e-mail, and telephone number.
- In the course of processing job applications, we receive identification numbers issued by federal or state governments, including, but not limited to, Social Security number and driver’s license number, and sometimes we also receive this information in the course of rendering services to our clients.
- Any information you provide us via correspondence, including but not limited to e-mail, voicemail, and recordings of telephone calls to our staff and offices.
- For clients receiving our services, we receive payment information.
- Pursuant to rendering certain services to our clients, we may occasionally receive information about an individual’s current or former physical, mental, or medical condition, health status, injury or disability, or medications consumed.
- Information from our subsidiaries including assignment information.
- Information from our clients regarding assignments we undertake for them and through which the personal information is provided for our use in rendering services.
- Technical information from website visitors, including internet protocol (IP) address, login information (username/password), browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.

Some of the information we collect about you may be personal information, or personal data, that can be used to identify you including, for example, your name, email address, mailing address or delivery address. In some jurisdictions, certain unique identifiers like IP addresses and other usage or technical information may be considered personal information. Personal information does not

include data where your identity has been removed so that we can no longer identify you (anonymous data or aggregated data), which we may use for any purpose.

HOW WE COLLECT YOUR INFORMATION

Information You Manually Provide: Gexpro Services collects information, including personal information, that you knowingly and manually provide when you use our Site or Customer Service. For example:

- If you use a “contact us” form to ask us a question, we will collect whatever personal information you submit with or include in your question.
- If you order products through our Site or Customer Service, we will ask you to provide the information we need to process and ship your order, such as your email address, billing and shipping address and perhaps your credit card information.

The type of personal information we collect varies depending upon how you contact us and how you use our Site and Customer Service.

Information Sent to Us by Your Web Browser: We collect information that is sent to us automatically by your web browser. This information typically includes your IP address, the identity of your Internet service provider, the name and version of your operating system, the name and version of your browser, the date and time of your visit, and the pages on our Site that you visit. Please check your browser if you want to learn what information your browser sends or how to change your settings. Your IP address is the identifier assigned to your particular computer when you access the Internet. IP addresses do not include your name, email address or other personal information, but in some cases, they can be used to identify you. For example, if you have registered with our Site, we may link your IP address to account information that identifies you personally. We may also use IP addresses in connection with other information gathered elsewhere in an attempt learn the identities or general geographic locations of people who visit our Site. If we suspect inappropriate or criminal activity or a threat to our Site or its users, we may share our server logs—which contain users’ IP addresses—with the appropriate investigative authorities, who could use that information to trace and identify individuals. We do not respond to or honor “do not track” (a/k/a DNT) signals or similar mechanisms transmitted by web browsers.

Cookies and Similar Technologies: Most websites use cookies and/or similar technologies to place information about a user’s visit to that website in a small data text file that is stored on the user’s computer. In general, we use cookies and other web technologies to:

- Collect information about the ways visitors use our Site—which pages they visit, which links they use, and how long they stay on each page;
- Support the features and functionality of our Site—for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits; and
- Personalize your experience when you use our Site, including by serving targeted advertisements.

Generally, the information we collect using these web technologies does not identify you personally. If, however, you have created a user account, we may link the information we collect using these web technologies to other information that identifies you personally. If you do not wish to receive cookies, you may be able to set the browser of your computer to reject cookies or to alert you when a cookie is delivered. You may also be able to delete our cookies as soon as you leave our Site. Although you are not required to accept our cookies when you visit our Site, if you set your browser to reject cookies, you may not be able to use all of the features and functionality of our Site.

Plugins: The Site may make available the option for you to use “plugins” that are operated by other companies. If you choose to use one of these plugins, then it may collect information about you and send it back to the company that owns it. This may happen even if you do not click on the plugin, if you are logged into the social media website that owns the plugin when you visit the Site. Information collected by a plugin is subject to the privacy policy and terms of the company that makes it. If you do not want the company who owns a plugin to collect information about you when you visit the Site, sign out of the company’s website before visiting. By interacting with a plugin when you are on the Site (for example, clicking the Facebook™ “Like” button), you are intentionally transferring information to that company. Further, if you are logged into a company’s website when you visit the Site, then you are directing us to share your data with the company that owns the plugin.

Web Beacons: Our website pages, advertisements, and e-mails may contain small transparent embedded images or objects known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count website page visitors or email readers, or to compile other similar statistics such as recording website content popularity or verifying system and server integrity.

Information from your mobile device: If you access our Site through your mobile device, we may automatically collect certain information from or about your mobile device. The types of information we may collect include the type of device you use, your device’s unique ID, the IP address of your device, your device’s operating system, the type of mobile Internet browsers you use, and information about the way you use our mobile website. If you have questions about the security and privacy settings of your mobile device, please refer to instructions from your mobile service provider or the manufacturer of your device.

Information Collected by Third-Party Cookies: In addition to the cookies Gexpro Services delivers to your computer through our Site, certain third parties may deliver cookies to you for a variety of reasons. You have choices about the collection of information by third parties on our Site. For example, if you would like to opt-out of having interest-based information collected by certain entities during your visits to our Site or any other company websites, please visit the [YourAdChoices](#) website and/or the [NAI](#) website to review your opt-out options. We may use Google™ Analytics to provide certain analytics services for us. More information about Google

Analytics can be found in the [Google Analytics Terms of Use](#) and the [Google Analytics Privacy Policy](#).

HOW WE USE YOUR INFORMATION

Generally, we use the information we collect to:

- Provide the information, products and services you request;
- Provide you with effective customer service;
- Provide you with a personalized experience when you use our Site;
- Contact you with information and notices related to your use of our Site;
- Contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);
- Invite you to participate in surveys and provide feedback to us (in accordance with any privacy preferences you have expressed to us);
- Improve the content, functionality and usability of our Site;
- Better understand your needs and interests;
- Improve our products and services;
- Improve our marketing and promotional efforts;
- Identify a robot;
- Fulfill our legal obligations to you and others and to demonstrate our regulatory and legal compliance;
- Protect our Site and ourselves legally;
- Enforce terms and conditions and policies;
- Respond to legal requests and prevent harm;
- Provide security, credit or fraud prevention; and
- Effect any other purpose identified in an applicable privacy notice or other agreement between you and us.

In some jurisdictions, individuals may have the right to withdraw consent from certain uses. If you reside in such jurisdictions, you may have additional rights which are detailed in the sections below entitled *Your Rights and Choices*, *Your California Privacy Rights*, *Your Nevada Rights*, *Your Canada Rights*, or *Your EU/EEA/UK Rights*. In all cases, any service providers will be contractually limited in the way they may use personal information maintained by Gexpro Services, including requirements that such information be maintained in a confidential and secure manner. If, in the future, we merge with or are acquired by another company, or change our structure, we may transfer your personal information to the surviving or acquiring entity. We will also disclose your personal information if we believe in good faith we are required to do so (a) by law or to comply with the law or legal process; (b) to protect and defend our rights or property or the rights or property of our clients; or (c) in an emergency to protect the personal safety of our employees, clients, visitors or the public. Gexpro Services may also disclose information to its accountants, auditors, agents, lawyers and other advisors in connection with the enforcement or protection of our legal rights or to protect the interests or safety of our customer, our customers' customers or employees or others, in accordance with or as authorized by law.

Use of Aggregated Information: We may use information gathered through our Site and Customer Service to create a compiled, aggregate view of our visitors and their usage patterns. We use aggregated information to operate our services and to better understand our visitors as we develop new products and services. We may also share aggregated information with our third-party service providers as well as with other third parties so they can better understand the market we serve. Aggregate information does not constitute personal information.

Steps We Take to Safeguard your Personal Information: We maintain reasonable administrative, physical and technological measures to protect the confidentiality and security of personal information you submit on or through our Site or through Customer Service. Unfortunately, no website, server, or database is completely secure or “hacker proof.” We therefore cannot guarantee that your personal information will not be disclosed, misused or lost by accident or by the unauthorized acts of others.

HOW WE SHARE YOUR PERSONAL INFORMATION WITH OTHERS

With Credit Card Payment Processors: Our Site and our Customer Service may permit you to use a credit card to order and pay for products online. We work with a third-party vendor to process your credit card payment. We accept Visa™, Mastercard™, and American Express™ using a PCI-compliant process.

With Other Third-Party Service Providers and Our Suppliers: Gexpro Services shares information—including personal information—we collect with other third-party service providers and our suppliers. For example, we may use third-party vendors to design, operate, and/or host our Site; to conduct surveys; to take and fulfill orders; and to help us with our promotional efforts. These third parties may need information about you to perform their functions. They are permitted to use your personal information only to perform services on our behalf.

In the Course of Business Negotiations: We may contemplate, for strategic or other reasons, selling, buying, merging, or otherwise reorganizing our business. In negotiating with a third party about entering into such an arrangement, we may need to disclose your personal information. In such cases, we will take reasonable measures to protect the personal information we disclose, for example, by requiring a prospective purchaser to sign a nondisclosure agreement limiting the use and protecting the confidentiality of the personal information.

As a Result of a Business Transfer: We may transfer the personal information you submit to any organization that acquires or merges with us.

To Comply with Laws and Protection of Our Rights and the Rights of Others: We may disclose your personal information when we believe disclosure is appropriate to comply with the law, a court order or a subpoena. We may also disclose your personal information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of our Site; to enforce or apply our online [Terms of Use](#) or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

Links to Other Sites: Our Site may provide links to other websites operated by third parties. We expect such third-party providers of products and services to be transparent about their data protection practices. Be aware, however, that we have no control over third-party websites. This Privacy Policy does not apply to personal information collected on any third-party website. When you access third-party websites through a link on our Site, please take a few minutes to review the privacy policy posted on that site.

BY USING OUR SITE AND OUR CUSTOMER SERVICE, YOU ARE CONSENTING TO THE COLLECTION, USE, AND TRANSFER OF YOUR PERSONAL INFORMATION IN OR TO THE UNITED STATES OR TO ANY OTHER COUNTRY IN THE WORLD SUBJECT TO THE TERMS OF THIS POLICY.

YOUR RIGHTS AND CHOICES

Access to, Updating or Deletion of Collected Information: Upon request, Gexpro Services will provide individuals the ability to correct, update, or remove their personal information collected by us. Customers are responsible for keeping their contact information current and accurate and may do so by checking and, if necessary, modifying their profile. To request that we correct, update, or remove personal information from our Site or our email system:

- Email us: privacy@gexproservices.com
- Call us at our Headquarters Phone: 972-915-0800 (Mon-Fri: 8:00AM – 5:00PM CT)

Unsubscribing from E-Mail Marketing: Recipients of our email marketing messages can unsubscribe from receiving promotional email using the unsubscribe instructions located at the bottom of the email message or by sending a request with “unsubscribe” in the subject line to privacy@gexproservices.com. You can also contact us at our Headquarters Phone: 972-915-0800 (Mon-Fri: 8:00AM – 5:00PM CT).

Additional Rights: Persons living in, or citizens of, California, Nevada, Canada, the United Kingdom, the European Union, or the European Economic Area may have additional rights set forth below in the sections titled *Your California Privacy Rights*, *Your Nevada Rights*, *Your Canada Rights*, or *Your EU/EEA/UK Rights*.

CHILDREN’S PRIVACY

The Site is not intended for children under 16 years of age. No one under 16 may provide any personal information to or on the Site. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on the Site or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at privacy@gexproservices.com.

YOUR CALIFORNIA PRIVACY RIGHTS

If you are a California resident, then this section of our privacy notice applies to you. If you are a California resident, California law provides you with the following rights with respect to your personal information:

- The right to know what personal information we have collected, used, disclosed and sold about you. To submit a request to know, you may call us at 972-915-0800 or by emailing us at privacy@gexproservices.com;
- The right to request that we delete any personal information we have collected about you. To submit a request for deletion, you may call us at 972-915-0800 or by emailing us at privacy@gexproservices.com;
- You also may designate an authorized agent to make a request for access or deletion on your behalf by emailing us at privacy@gexproservices.com.

When you exercise these rights and submit a request to Gexpro Services, we will verify your identity by asking you for your email address, telephone number, information about your company’s contract with our Company, or the last four digits of a credit or debit card used with our Company. We also may use a third-party verification provider to verify your identity. Your exercise of these rights will have no adverse effect on the price and quality of our goods or services.

For the 12-month period prior to the date of this Privacy Policy, Gexpro Services has not sold any personal information about its customers or their employees, or about our customers’ customers; nor does it have any plans to do so in the future. Please note: If you are a customer of one of our customers, you should contact them first concerning your California privacy rights.

YOUR COLORADO PRIVACY RIGHTS

If you are a resident of Colorado, you have the right to opt-out of targeted advertising, the sale of personal data to third parties, or profiling for automated decision purposes. Gexpro does not sell personal data and has not sold your personal data for at least the past 12 months. You can exercise your rights by contacting us at privacy@gexproservices.com with the subject line “Colorado Opt-Out Request” and providing us with your name and the email address associated with your account.

YOUR CONNECTICUT PRIVACY RIGHTS

If you are a resident of Connecticut, you have the right to opt-out of targeted advertising, the sale of personal data to third parties, or profiling for automated decision purposes. Gexpro does not sell personal data and has not sold your personal data for at least the past 12 months. You can exercise your rights by contacting us at privacy@gexproservices.com with the subject line “Connecticut Opt-Out Request” and providing us with your name and the email address associated with your account.

YOUR NEVADA PRIVACY RIGHTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal data to third parties who intend to license or sell that personal data. Gexpro does not sell personal data and has not sold your personal data for at least the past 12 months. You can exercise your rights

	POLICY AND PROCEDURES	PRIVACY POLICY
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by contacting us at privacy@gexproservices.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account.

YOUR UTAH PRIVACY RIGHTS

If you are a resident of Utah, you have the right to opt-out of targeted advertising, the sale of Personal Data to third parties, or profiling for automated decision purposes. Gexpro does not sell personal data and has not sold your personal data for at least the past 12 months. You can exercise your rights by contacting us at privacy@gexproservices.com with the subject line “Utah Opt-Out Request” and providing us with your name and the email address associated with your account.

YOUR VIRGINIA PRIVACY RIGHTS

If you are a resident of Virginia, you have the right to opt-out of targeted advertising, the sale of Personal Data to third parties, or profiling for automated decision purposes. Gexpro does not sell personal data and has not sold your personal data for at least the past 12 months. You can exercise your rights by contacting us at privacy@gexproservices.com with the subject line “Virginia Opt-Out Request” and providing us with your name and the email address associated with your account.

YOUR CANADA PRIVACY RIGHTS

If you are a Canadian resident, then this section of our privacy notice applies to you. We strive to comply with applicable Canadian privacy laws and regulations, including the Personal Information Protection and Electronic Documents Act (PIPEDA), in connection with processing Canadian personal information. We will only use your personal information for the purposes described in this Privacy Policy unless (1) we have obtained your consent to use it for other purposes; or (2) we are otherwise permitted or required by applicable law to use it for such other purposes. For questions about our privacy practices with respect to Canada or PIPEDA, please contact privacy@gexproservices.com or as directed in the *Contact Us* section of this policy.

Transferring your personal information outside of Canada: We may transfer personal information that we collect, or that you provide, to third parties (including affiliates, service providers and others) as described in the *How We Share Your Personal Information With Others* section above. We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law, such as to the United States. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. You are welcome to contact us if you have questions regarding the collection, use, disclosure or storage of personal information by our service providers and affiliates outside Canada, and/or to obtain access to written information about our policies and practices with respect to service providers (including affiliates) outside Canada.

Data Retention: Your personal information may be kept in other countries, such as the United States, and accessible to our employees and service providers who have a “need to know” such information for the purposes described in this privacy policy. Except as otherwise permitted or

Distribution: All Gexpro Services Site Users	Issued by: Legal, Risk & Compliance	Effective Date: December 24, 2023	Page 8 of 11
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required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and/or for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you, either directly or indirectly, alone or in combination with any other information. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

Accessing and correcting your personal information: By law you have the right to request access to and to correct or rectify the personal information that we hold about you, subject to certain exceptions as required or permitted by applicable law. If you have any account, you can review and change your personal information by logging into your account and visiting the pages that correspond to the information you want to review and change. In some cases, a change of information may require a new account. If you want to access, review, verify, correct, rectify, update, or withdraw consent to the collection, use or disclosure of your personal information you may also contact us as directed in the *Contact Us* section of this policy to make such a request. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to all of some of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons, subject to any legal or regulatory restrictions.

We will provide access to your personal information, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions may include (without limitation): a) Information protected by solicitor-client privilege; b) Information that is part of a formal dispute resolution process; c) Information that would reveal the personal information or confidential commercial information of another person; or d) Information that is prohibitively expensive to provide.

YOUR EU/EEA/UK PRIVACY RIGHTS

If you are in the European Union, European Economic Area, United Kingdom, or are otherwise subject to the General Data Protection Regulation, then this section of our privacy notice applies to you.

Data controller: The data controller of the processing described herein is GS Operating, LLC dba Gexpro Services.

Additional information about data we collect about you: Although we do not intend to collect any special categories of personal data about you (including details about your race, ethnicity,

religious or philosophical opinions, trade union membership, information about your health, genetic data, biometric data, or criminal conviction and criminal offense data) it is possible that our clients may share such information with us as a result of a specific assignment that our clients provide to us.

Lawful basis: We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into, or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, potentially including uses such as determining the success of our services and for determining marketing performance to share relevant information and offers about our products with clients and potential clients.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

Your data subject rights: Data subjects have the right, at any time, to request access to, rectification or erasure of his/her personal data, or restriction or objection to processing, as well as the right to data portability, or to withdraw the consent given by addressing a written communication to:

Richard D. Pufpaf
 SVP, Secretary, General Counsel and Chief Compliance Officer
 8770 West Bryn Mawr, Suite 900
 Chicago, IL 60631
 Office: 773.304.5226
 Cell: 773.251.8991
 Email: Rick.Pufpaf@lawsonproducts.com

You can alternatively send an e-mail to: privacy@gexproservices.com to the attention of the privacy officer, providing a copy of your identity document, or any document proving your identity. We reserve the right to verify the truthfulness of personal data provided at any time. We do not use any type of automated process for profiling purposes.

Data retention: We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or

	POLICY AND PROCEDURES	PRIVACY POLICY
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disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. In any event, we do not intend to hold the data for more than five years.

Transfer of Data: Your 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 than those from your jurisdiction. If you are located in the EU, EEA, or UK and choose to provide information to us, please note that we may transfer the data, including personal information, to other countries outside of your region and process it there. Your consent to this privacy notice followed by your submission of such information represents your agreement to that transfer. Gexpro Services will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice and no transfer of your personal information 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.

CHANGES TO THE PRIVACY POLICY

This Policy May Change: This Privacy Policy describes Gexpro Services’ current policies and practices regarding the information, including Personal Information, we collect through our Site and Customer Service. We are continually improving and adding to the features and functionality of our Site and the services we offer. As a result of these changes (or changes in the law), we may need to update or revise this Privacy Policy. Accordingly, we reserve the right to update or modify this Privacy Policy at any time, without prior notice. If the changes materially alter how we use or treat your information we will notify you by email to the primary email address specified in your account (if you have an account with us) and/or through a notice on the Site. Your continued use of our Site and our Customer Service after we have posted the revised Privacy Policy constitutes your agreement to be bound by the revised Privacy Policy. This Privacy Policy and any revisions are effective on the date appearing on the top of each page of this Site.

CONTACT US

You are always welcome to contact us regarding our privacy practices. Please direct any questions or concerns to us via any means set forth below:

- Email us: privacy@gexproservices.com
- Call us at our Headquarters Phone: 972-915-0800 (Mon-Fri: 8:00AM – 5:00PM CT)
- Write to us at: GS Operating, LLC dba Gexpro Services, 9500 N. Royal Ln, Suite 130, Irving, Texas 75063

Distribution: All Gexpro Services Site Users	Issued by: Legal, Risk & Compliance	Effective Date: December 24, 2023	Page 11 of 11
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