LAST UPDATED: July 16, 2019

PRIVACY POLICY

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 (the "Websites");
- Software applications made available by us for use on or through computers and mobile devices (the "**Apps**");
- Our social media pages and apps located at such sites (collectively, our "Social Media Pages"); and
- Offline business interactions you have with us.

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

PERSONAL INFORMATION

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

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

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, sign up to receive literature or electronic communications, 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 or contact us on the phone.
- 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 digital content is 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
- 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.
- To third-party sponsors of surveys, contests, and similar promotions.

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

"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
- 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 bv going www.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 https://tools.google.com/dlpage/gaoptout.

We use Facebook pixels and LinkedIn Insight Tag which use cookies and similar technologies to collect and analyze additional activities and trends. You can learn about these practices at www.facebook.com/about/privacy/update and www.linkedin.com/legal/cookie-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.

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.

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 marketingrelated 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.

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

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).

SENSITIVE INFORMATION

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

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

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, please contact us at DataPrivacy_Simpson@strongtie.com

ADDITIONAL INFORMATION REGARDING THE EEA

You may also contact our Data Security Lead (DSL) responsible for your country or region, if applicable. For a list of DSLs, please email compliance@strongtie.com