

# NORTH AMERICA AND ASIA PRIVACY NOTICE

EFFECTIVE DATE: March 2020

This Privacy Policy describes how Johns Manville (“JM,” “we,” “our,” “us”) may collect, use, and share information we obtain about you in the course of operating our business, including when you visit [www.jm.com](http://www.jm.com) and other authorized JM-affiliated websites that link to this Privacy Policy (collectively, the “Services”).

For those who reside in California, please see “Additional Information for California Residents”.

## Collection of Personal Information

We may collect the following categories of personal information from and about you:

- Identifiers such as a name, postal address, unique personal identifier, online identifier, IP address, email address, account name, or other similar identifiers;
- Demographic information, including characteristics protected by law, such as your gender or age;
- Commercial information, such as your purchase history or products you have expressed interest in;
- Biometric information;
- Internet or other electronic network activity information, such as the data we receive when you interact with our website;
- Geolocation data, such as information we receive about your device location (e.g., based on your IP address) to suggest appropriate JM locations;
- Audio, electronic, visual, thermal, olfactory, or similar information, such as photographs or voice recordings;
- Professional or employment-related information, such as your employer or title;
- Education information; and
- Inferences drawn from the above categories.

We collect personal information about you from a variety of sources, including:

- **From you:** We collect information that you submit to us. For example, when you contact us, provide website feedback, create an account, sign up for notifications regarding news, products and promotions, respond to surveys, submit comments, submit a service or substitution request, or register for classes or trainings.
- **From your devices:** When you use our Services, we may collect information about the devices you use to access the Services, including hardware model, operating system and version, Internet Protocol (“IP”) address and other unique device identifiers, mobile network information, and information about the device’s interaction with our Services. We also collect information about how you use our Services, including your access times, browser types, and language. This type of data enables us to understand how often individuals use parts of the Services so we can analyze and improve them. To collect this information, we use cookies and web beacons, and other similar technologies. A cookie is a piece of data that a website can send to your browser, which may then be stored on your computer as an anonymous tag that identifies your computer, but not you. Many web browsers are set to accept cookies by default, but you may be able to set your browser to notify you before you receive a cookie, or to remove or reject cookies. Please note that if you disable cookies, you may not be able to use certain features of the Services or other websites and disabling cookies may invalidate opt outs that rely on cookies to function. Note that this Privacy Policy covers only how we use information collected via cookies; it does not cover the use of such information by third parties.

- **From third parties:** We may obtain information about you or your use of the Services from third parties and sources, such as our vendors, like web hosting providers, analytics providers, or advertisers. You may give us permission to access your information from services offered by third parties. The information we obtain from third party services depends on your account/privacy settings with those third parties and the third parties' privacy policies, so be sure to check those policies and to adjust your settings to meet your preferences. When you access the Services through third-party platforms, you are authorizing JM to collect, store, and use such information and content in accordance with this Privacy Policy. Please keep in mind that any information provided to us by a third party may also be subject to that third party's privacy policy.

For certain features available through the Services, you may submit the personal information of others. For example, when registering for in-person or on-site classes or trainings, you may provide information related to your emergency contact including their name, phone number, and other contact information. When you submit personal information about others, you represent that you have obtained their consent to provide and disclose their personal information to us.

Please note that we or third parties may collect personal information about your online activities over time and across different devices and online properties when you use the Services.

### **Use of Personal Information**

We may use personal information we collect through the Services to:

- Respond to your inquiries and fulfill your requests;
- Complete and process commercial transactions;
- Process your registration and identify you as a user;
- Allow you to participate in surveys;
- Contact you with information, including transactional or promotional information;
- Improve the Services and our marketing or develop new services;
- Administer and troubleshoot the Services;
- Analyze your use of the Services and personalize and enhance your experience;
- Comply with applicable laws, regulations, or legal process, as well as industry standards and our company policies;
- Prevent, investigate, identify, stop, or take any other action with regard to suspected or actual fraudulent or illegal activity, or any activity that violates our policies;
- As otherwise stated in this Privacy Policy, the Terms, or the other privacy policies or terms and conditions; and
- For any other purpose, in accordance with applicable law

We may also use third-party web analytics services, such as Google Analytics, to help us analyze how visitors use the Services. To learn more about opting out of data collection through Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout>.

### **Sharing and Transfer of Personal Information**

We may permit our agents, vendors, consultants, and other service providers to access information obtained through the Services to carry out work on our behalf. Our service providers use personal information that we disclose to them only for the purpose for which it was disclosed. We may also share and transfer your personal information among JM's group companies. Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located.

We also may share and transfer your information:

- If we are required to do so by law, regulation, or legal process (such as in response to a subpoena or court order or similar government request for information);
- To respond to requests by government agencies, including law enforcement authorities;
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity;
- To enforce our policies, or to protect legal rights, property, or safety; and
- With third parties to investigate or address possible criminal or fraudulent activity.

In addition, we reserve the right to disclose any information we obtain through the Services in the event we sell or transfer all or a portion of our business or assets (e.g., further to a merger, reorganization, liquidation, or any other business transaction), including negotiations of such transactions.

We may disclose the following categories of personal information for our business purposes:

- Identifiers;
- Demographic information;
- Commercial information;
- Biometric information;
- Internet or other electronic network activity information;
- Geolocation data;
- Audio, electronic, visual, thermal, olfactory, or similar information;
- Professional or employment-related information;
- Education information; and
- Inferences drawn from the above categories.

Note that California law characterizes some sharing and transfer of personal information as a “sale,” even when the sharing or transfer is not done in exchange for monetary consideration. JM does not believe that any of the sharing or transfers described in this policy constitute sales under California law.

## **Security**

We take reasonable measures to protect your information from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the Internet and online digital storage are not completely secure and we cannot guarantee the security of your information collected through the Services.

## **Retention**

In general, 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. For example, we will keep your information in order to:

- maintain business records for analysis and/or audit purposes;
- comply with record retention requirements under the laws;
- defend or bring any existing or potential legal claims; and/or
- deal with any queries or complaints you may have.

## **Linked Websites**

The Services may include links to websites that are not owned and/or operated by JM. This Privacy Policy does not apply to those websites, which may have their own privacy policies or notices that you should review to understand how they may use or disclose your personal information. JM is not responsible for the content or privacy practices of any linked websites that are not owned and/or operated by JM.

## **Social Features**

The Services may include features that are designed to permit interactions that you initiate between the Services and third-party websites or services, including third-party social networks (collectively, “Social Features”). For example, you may be able to “like” or “share” content from the Services on other websites or services.

If you use Social Features, both JM and the third-party services that operate those Social Features may have access to certain information about you and your use of both the JM and third-party websites. The information we collect in connection with your use of Social Features is subject to this Privacy Policy. The information collected and stored by the third parties remains subject to those third parties’ privacy practices, including whether the third parties continue to share information with us, the types of information shared, and your choices with regard to what is visible to others on those third-party websites or services.

## **User-Generated Content**

The Services may enable users to submit their own content, such as comments, messages, questions, or other information (“User-Generated Content”). We or others may store, display, reproduce, publish, distribute, or otherwise use User-Generated Content online or offline in any media or format (currently existing or hereafter developed) and may or may not attribute it to you. Others may have access to this User-Generated Content and may have the ability to share it with third parties. If you choose to submit User-Generated Content to any public area of the Services, your User-Generated Content will be considered “public” and will be accessible by anyone. Please note that we do not control who will have access to the information that you choose to make available to others and cannot ensure that parties who have access to such information will respect your privacy or keep it secure. We are not responsible for the privacy or security of any information that you make publicly available on the Services or what others do with information you share with them on the Services. We are not responsible for the accuracy, use, or misuse of any User-Generated Content that you disclose or receive from third parties through the Services.

## **Your Choices**

### *Changing your Personal Information*

You may make changes to your personal information, including keeping your information accurate, by accessing your account settings or contacting us at [privacy@jm.com](mailto:privacy@jm.com).

### *Email Communications*

You may make changes regarding receiving email communications from us by exercising options indicated at the bottom of each email communication or contacting us at [privacy@jm.com](mailto:privacy@jm.com). If you register an [email press release account](#), you may make changes to your email press release and alert options through your account settings. Please note that even if you opt out of receiving promotional communications from us, we may continue to send you non-promotional emails, such as communications regarding our ongoing relationship with you.

### *Interest-Based Advertising*

We may use your personal information to conduct Interest-based Advertising on third-party websites or services. Certain third parties may participate in the Digital Advertising Alliance (“DAA”) AdChoices Program and may display an advertising option icon for interest-based ads that links to an opt-out tool which allows you to exercise certain choices regarding targeting. You can learn more about the DAA AdChoices Program at <http://www.youradchoices.com/> and its opt-out program for mobile apps at <http://www.aboutads.info/appchoices>. In addition, certain advertising networks and exchanges may

participate in the Network Advertising Initiative (“NAI”). NAI has developed a tool that allows consumers to opt out of certain interest-based ads delivered by NAI members’ ad networks. To learn more about opting out of such targeted advertising or to use the NAI tool, see <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of interest-based ads, you will continue to receive non-targeted ads. We are not responsible for the effectiveness of, or compliance with, any third-parties’ opt-out options or programs or the accuracy of their statements regarding their programs.

### *Do Not Track*

Your web browser may have settings that allow you to transmit a “Do Not Track” signal when you visit various websites or use online services. Like many websites, our websites are not designed to respond to “Do Not Track” signals received from browsers. To learn more about “Do Not Track” signals, visit <http://www.allaboutdnt.com/>.

### **Additional Information for California Residents**

California law permits customers in California to request certain details about how their personal information is shared with third parties, if the personal information is shared for those third parties’ own direct marketing purposes. We do not share personal information with third parties for those third parties’ own direct marketing purposes. Californians may request information about our compliance with this law by contacting us at [privacy@jm.com](mailto:privacy@jm.com) or by postal mail sent to:

Attn: Chief Privacy Officer

Johns Manville

717 17<sup>th</sup> Street

Denver, CO 80202

To make a request, please provide sufficient information for us to determine if this applies to you, attest to the fact that you are a California resident, and provide your current California address to which we will send our response. Your inquiry must specify “California Privacy Rights Request” in the subject line of the email or the first line of the letter, and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year.

California law also grants its residents certain rights regarding the collection and use of their personal information. Subject to certain limitations, California residents have the right to:

- Access personal information we have collected about them;
- Know the categories of personal information we have collected, the sources from which we have collected personal information, the purposes for which we collected and/or shared personal information, the categories of personal information disclosed for consideration, the categories of third parties to whom we disclosed personal information, and the categories of personal information that we disclosed for a business purpose about them; and
- Delete the personal information we have collected about them.

To exercise the above rights, you may submit your request at [privacy@jm.com](mailto:privacy@jm.com) or call us at our toll-free number 1-866-256-1943. Please note, that under certain circumstances, we may be prohibited from complying with, or have the discretion as to whether to comply with, your request in full. We will not engage in illegal discrimination on the basis of you exercising any of the above-listed rights.

### **Information for Users Outside the United States**

If you are visiting the Services from outside the United States, please be aware that information we obtain about you will be processed in the United States or in other jurisdictions. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other countries may be different from the laws in your country of residence.

### **Revisions**

JM may change this policy from time to time by updating the Privacy Policy page on JM's website. JM will provide additional notification of changes to the extent required by law.

### **Contact information**

Please direct comments or questions regarding this Privacy Policy, including how to access this Privacy Policy in a more accessible format, via e-mail to [privacy@jm.com](mailto:privacy@jm.com).