


<b>POLICY: Privacy Policy</b>			
Issued by: Information Technology	Approved by: Executive Committee	Approved Date: 7/19/2021	IT-P12

This policy is effective as of July 19th, 2021.

**Introduction**

At Flatiron Construction Corp. (“Flatiron”, “we”, “us”, or “our”), we respect your privacy, and are committed to protecting the personal information we collect. This Privacy Policy (the “Policy”) applies to Personal Information obtained through digital services provided by Flatiron, which include Flatiron’s website www.flatironcorp.com and any other Flatiron online or mobile website, application, or digital service, as well as information we collect offline (collectively, the “Services”).

When you submit information to us or through our Services, you consent to the collection and processing of your information as described in this Privacy Policy. IF YOU DO NOT AGREE WITH ANY PART OF THIS POLICY, THEN PLEASE DO NOT USE THE SERVICES OR SUBMIT INFORMATION TO US.

**Privacy Notice Changes**

The effective date of this Policy is indicated at the top of this page. We may modify this Policy from time to time, and will post changes here. Your continued use of the Services following these changes means that you accept the revised Policy.

**About Flatiron**

Since 1947, Flatiron has been a leading construction service provider for critical large-scale infrastructure projects. We are a subsidiary of German-based HOCHTIEF. The nature of our business is such that we offer our services exclusively to other businesses (a “business-to-business” or “B2B” model). Our website and Services are intended for a commercial audience.

**What We Collect**

Flatiron may collect Personal Information in the course of our normal business activities, as detailed below.

Flatiron collects, uses, stores and processes Personal Information, which is data that identifies, relates to, describes, or can reasonably be associated with a particular person. This can include:

- Identifying information including name, postal or e-mail address, and phone or fax number, social security numbers, social insurance numbers, driver’s license and government identification numbers.
- Financial information such as bank account, credit or debit card information, and/or information that may be contained in a consumer report.
- Business contact information including as job title, department and name of organization, business address, e-mail address, mobile telephone number.
- Usernames and passwords used to access Flatiron network resources such as our Flatiron login webpage.
- Website visitor activity including IP address, the identity of the Internet service provider, the name and version of the operating system, the name and version of the browser, the date and time of the visit, the pages visited. This data may be aggregated such that the individual identities have been removed.
- Biometric information: Physiological, behavioral, biological characteristics, activity patterns, fingerprints, face scans eye scans.
- Geolocation information: Physical location, movements, and mobile device unique identifier.
- Financial information including as financial account information used for payment purposes and/or information that may be contained in a consumer report, bank account information.
- Contact information for referrals.
- Employment information: Employment history, employee number, performance appraisals, salary and benefits, healthcare and health insurance information, education information, emergency contact information.
- Protected class information: Age, race, color, national origin, citizenship, religion or creed, marital status, disability information, sex, genetic information, military or veteran status.

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### How We Collect Information

- When you visit our website, we may collect information about your visit.
- Directly from clients, contractors, sub-contractors, vendors, employees, and job applicants.
- From third parties including contractors, sub-contractors, and government agencies.

### Cookies and Tracking Technologies

We and our service providers use cookies and other tracking technologies (such as web beacons, tracking pixels, and HTTP referrers) to collect and store information about your interactions with our website, including information about your browsing behavior. Cookies are small files that are transferred to a computer's hard drive through a web browser that enable the site's or service provider's systems to recognize the user's browser and capture and remember certain information. In general, we and our service providers use cookies and other tracking technologies to optimize the functionality of our website (including by storing your browsing preferences for future visits and identifying repeat visitors), to optimize the various features on our website, to help us understand how our website is used, and to provide users with content or advertising based on their browsing activities.

If you do not want to have cookies placed on your device, you should set your browser to refuse cookies before accessing our website. Please review your browser's Help menu for instructions, or visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for more information on disabling and deleting cookies. Please note that, if you turn cookies off, some features of our website may not function properly.

Emails that we and our marketing service providers send may include similar tracking tools that provide us with information related to whether you've opened an email or clicked on a link contained in an email. More information on consenting to receive and how to unsubscribe from our marketing emails is found below.

### Website Analytics

We use Google Analytics to ensure website functionality and to improve our website. This software may record information such as your IP address, location, age and gender, browser type and language, operating system, access time, duration of visit, pages you view within our website, search terms you enter, and other actions you take while visiting us, the pages you view immediately before and after you access our website, how often you use our website, aggregated usage and performance data, application errors, and debugging information. Google Analytics is owned and controlled by Google LLC. Data collected by Google is subject to its privacy policy. You may opt-out of having your activity on our website made available to Google Analytics by installing the Google Analytics browser add-on, available here <https://tools.google.com/dlpage/gaoptout>.

### Managing "Do Not Track" Signals

Some browsers have a Do Not Track ("DNT") feature that lets your browser automatically send a signal to websites, ad networks, plug-in providers, and other web services you encounter while browsing to stop tracking your activity via cookies or other tracking technologies. Our website does not currently have the capability to respond to DNT signals.

### Why We Collect Your Personal Information

We collect personal information to conduct our business activities, including:

- Executing business activities, including completing our services.
- Conducting marketing and promotional activities, including responding to inquiries about Flatiron products or services, providing offers and information (as permitted by law) about products, services, or events offered by Flatiron.
- Improving the functionality, security, and usability of Flatiron's website.

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- Security, including monitoring log-in portals for access, validating identity, and preventing fraud.
- Fulfilling a legal or contractual obligation.
- Managing employee relationships, including the administration of benefits.
- Processing job applications, including background investigations.
- Validating identity for security to allow access to Flatiron premises and job sites.
- Complying with applicable laws or regulations.

## Consent

Ordinarily we ask for consent to collect, use or disclose personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose. We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information.

You may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our reasonable business or legal obligations. We will respect your decision, but we may not be able to provide you with certain services if we do not have the necessary personal information.

## How We Share the Information

Flatiron may share this information with:


- Other entities controlled by or under common control with Flatiron, including all affiliated entities using the Flatiron® mark
- Vendors
- Service providers
- Contractors or sub-contractors
- Federal, state, and local governments

For the purposes of:

- Fulfilling Flatiron’s commercial, contractual, legal, and regulatory obligations.
- Responding to subpoenas, court orders, or other lawful requests by public authorities, and to meet national security or law enforcement requirements.
- Investigating illegal activities, suspected fraud, or as otherwise required by law or regulation.
- Centralizing Flatiron’s administrative, IT maintenance, and IT security practices.
- Providing information about Flatiron products, services, or events.

Any third-party that receives personal information from Flatiron may only process the information in accordance with applicable data processing agreements or contracts terms which require the third-party to protect the data and process it in a manner consistent with applicable privacy laws, regulations and Flatiron’s policies and practices.

**For Canadian Residents:** We may disclose your Personal Information to third party service providers located in the United States. Where Personal Information is stored or processed outside of Canada, it is subject to the laws of that foreign jurisdiction, and may be accessible to that jurisdiction’s governments, courts or law enforcement or regulatory agencies.

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### Third-Party Links

Flatiron’s websites may provide links to other third-party websites that are outside of Flatiron’s control and not covered by this Privacy Policy. Flatiron is not responsible for the availability, content, or accuracy of third-party policies, nor is it responsible for the privacy practices of other websites, products, services, or goods that may be linked to Flatiron’s websites. Flatiron encourages all users of its websites to review the privacy policies posted on these (and all) sites.

### Children

Flatiron’s services are not directed to persons under 16 years of age. We do not knowingly collect personal information from children under 16. If a parent or guardian becomes aware that their child has provided us with personal information without the parent’s consent, they should contact us at [privacy@flatironcorp.com](mailto:privacy@flatironcorp.com). If we become aware that a child under 16 has provided us with personal information, we will take steps to delete the information from our records.

### Security

Flatiron has in place security policies that are intended to ensure the security and integrity of Personal Information. Flatiron has commercially reasonable and appropriate technical and organizational measures in place to protect against unauthorized or unlawful processing of Personal Information and against accidental loss or destruction of, or damage to, Personal Information held or processed by Flatiron. If Flatiron forwards Personal Information to any third party, Flatiron requires that those third parties have appropriate technical and organizational measures in place to comply with this Privacy Policy and applicable laws.

### Right to opt – in and opt-out of marketing email communications

You have the right to opt- in and opt-out from marketing communications. We provide an unsubscribe link in all marketing communications. If you opt-out of receiving marketing email communications, we may still send you email messages related to your account or specific transactions with us.

### Californian Consumers’ Rights Under the California Consumer Privacy Act (CCPA)

The California Consumer Privacy Act of 2018 provides California consumers (California residents) with specific rights regarding their personal information. If you are a California resident, you have the rights under data protection law which are explain in the IT-P13 Supporting Info - CCPA Policy.

### Visitors outside North America

This Privacy Policy is intended to meet the laws and requirements of the United States and Canada, which may not necessarily be consistent with or as comprehensive as the laws and regulations of other countries. If you are located outside of the United States or Canada, please be advised that any information you provide to us will be transferred to the United States and that by submitting information, you authorize its transfer. Where Personal Information is stored or processed outside of Canada, it is subject to the laws of that foreign jurisdiction, and may be accessible to that jurisdiction’s governments, courts or law enforcement or regulatory agencies.

### For Canadian Residents

Requesting access to their own personal information must be received in writing to the Privacy officer. You must provide sufficient information to your request to allow us identify the information you are seeking. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. **We will only refuse access to information about you in those circumstances permitted or required by applicable privacy legislation.**

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**How to Contact Us**

If you have any concerns or questions about anything in this Privacy Notice, please get in touch with us.

**Flatiron Construction Corp.**  
**Privacy Officer**  
385 Interlocken Crescent  
Suite 900  
Broomfield, CO 80021  
303-485-4050  
[privacy@flatironcorp.com]