

PRIVACY POLICY

Rexel USA, Inc., and any of its subsidiaries, affiliates, business units or divisions (including but not limited to (i) Rexel Automation, (ii) Rexel Commercial & Industrial, (iii) Platt Electric Supply, (iv) Rexel Energy Solutions, (v) Gexpro, (vi) Capital Light, (vii) Parts Super Center, (viii) New Haven Supply, (ix) Brohl & Appell, (x) Utility Supply Group, (xi) Mayer Electric, (xii) Electrical Parts, (xiii) The Hite Company, (xiv) Upchurch Electrical, (xv) Horizon Solutions, (xvi) Buckels-Smith Electric Company, (xvii) Allied Electric, (xviii) Reulet Electric, (xix) Teche Electric Supply, (xx) Schwing Electric Supply Corp, (xxi) Warshauer Electric Supply Company, and (xxii) Talley LLC) (hereinafter collectively referred to as the “Company”) is committed to protecting the privacy of those who entrust us with their personal information. Our customers and employees trust and expect that we will protect their personal information in accordance with the promises we make.

“Personal information” means any information pertaining to an identified or identifiable individual and may include, for example, email addresses, contact details, biometric data, and any similar information provided to us in the course of our business operations. Personal information that is de-identified or anonymized is not considered personal information. This Privacy Policy details our commitment to your privacy.

1) Who We Are

The Company, headquartered in Dallas, Texas, is the U.S. operations of Rexel S.A., a worldwide expert in the professional multichannel distribution of electrical products and services for the energy world. The Company provides a broad range of sustainable and innovative products, services, and solutions in the field of technical supply, automation, and energy management related to construction, renovation, maintenance, and production.

2) What Does This Privacy Policy Cover?

This Privacy Policy describes the Company’s privacy practices regarding personal information it receives in connection with the services and products the Company provides to its customers (the “Services”), as well as through our website (the “Site”).

This policy describes the information that the Company may collect about visitors to our websites, web applications, or mobile applications, if applicable (collectively, the "Website") or about our customers, prospective customers, employees, and prospective employees, how we use that information, and how we protect that information. It also discusses certain choices you have regarding your personally identifiable information. By using our Website or otherwise submitting information to the Company, you consent to the following terms, as they may be amended from time to time.

3) Information We Collect

Online: You may visit our Website anonymously. We collect your Internet Protocol (IP) address, but this information generally does not reveal your identity. The data that we regularly collect about visitors to our Website (e.g., browser type, pages accessed, duration of visit, etc.) does not enable us to identify you. We use "cookies," small files that are sent to your browser and stored on your hard drive, to identify you as a unique user on our Website. Our use of cookies is explained in more detail below. We collect personally identifiable information about you only if you voluntarily provide it to us by requesting information, products, or services from us.

Offline: We collect information that you provide us to set up an account or otherwise form a customer relationship with the Company or to consider you for a job with the Company. Once an account is opened or customer relationship is formed, we may collect information about your purchasing and payment history. If you are hired by the Company, we may collect information about your salary, benefits, qualifications, and performance.

Mobile: If you opt to do so, we collect your GPS location from your mobile device to (a) help you find the nearest branch to your current location; and (b) if you choose to provide a photo for our mobile application product identifier, your photo will be saved with the info from your current location.

Artificial Intelligence and Automated Processing: The Company collects and processes data through Artificial Intelligence (AI) and automated systems to improve our services and operational efficiencies. This includes monitoring and analyzing incoming emails to automatically route communications to the appropriate recipient based on email content.

Biometric Data: The Company collects biometric data, such as fingerprints and video recordings, for legitimate business purposes including timekeeping systems and safety monitoring in company vehicles.

4) Information You Provide

Online: When you visit our Website, you may provide personally identifiable information in order to purchase products or take advantage of services or job opportunities offered through our Website. For example, you might provide your name, address, telephone and fax numbers, and email address. We collect and store that information. You may always choose not to provide the information we request. However, you may then be unable to take advantage of the features and services we offer on our Website.

Offline: When you sign up for an account or otherwise do business with the Company, you may provide personally identifiable information of yourself, if an individual or sole proprietor, or the company officers or contact persons, in addition to company information, if a company. We may use that information to obtain a credit, D&B or similar report or otherwise evaluate your eligibility for an account. When you apply for a job, you may provide personally identifiable information, such as name, address, telephone number, email address, birthdate, and Social Security Number (SSN). We may use that information to obtain a credit report, do a background or reference check, or otherwise evaluate your suitability for the job.

5) Information from Other Sources

From time to time, we may purchase or otherwise acquire information about you from other sources and add it to our database, including without limitation updated delivery and address information.

6) Overview of Information the Company Collects and How It Is Used and Shared

For the 12-month period prior to the date of this Privacy Policy, we explain here what categories of personal information we have collected, where we got it from, and with whom we have shared it:

If you choose to provide us with personally identifiable information, including biometric data and information processed through AI systems, we will use that information to respond to your inquiry, process your order or application or to conduct our business. We may provide this information to third parties if we believe in our discretion it would be helpful in responding to you, or if this information is necessary for the third party to do their job (see "Third Party Service Providers," below).

We use AI and automated processing technologies to improve our services and operational efficiencies, including automated routing of communications and monitoring of company vehicle operations.

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 section entitled Privacy Rights in Certain States below.

In all cases, any service providers will be contractually limited in the way they may use personal information maintained by the Company, 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 personally identifiable information to the surviving or acquiring entity.

We will also disclose your personally identifiable 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.

The Company 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, employees, or others, in accordance with or as authorized by law.

7) Monitoring and Surveillance

To ensure safety, security, and compliance with company policies, the Company may monitor certain activities, including:

- Video and audio monitoring inside company vehicles to detect driver distractions or unsafe behaviors.
- Use of biometric timeclocks for attendance verification.

Such monitoring is conducted in accordance with applicable laws and with respect for employee privacy. Data collected through monitoring is used solely for legitimate business purposes and is protected with appropriate security measures.

8) Information from Our Client's Customers

The Company may process transactions or applications that are supplied and managed by our customers. As a result, although we may access certain personal information of our customers' customers pursuant to the contractual relationships we have with our customers, we typically do not collect and store personal information in our own systems except as may be necessary to provide services to our customers.

Typically, our customers are responsible for complying with all notices, notifications, and alerts to individuals whose information is entered into our systems or portals. We do not use or share that personal information except as directed by our customers.

9) No Sale or Sharing of Personally Identifiable Information

Any and all personal information collected by the Company, including biometric data and information processed through AI systems, will be kept strictly confidential and will not be sold, shared, reused, rented, disclosed, or loaned to third parties, except as otherwise described in this Privacy Policy.

10) Third Party Service Providers

The Company may from time to time engage others ("Third-Party Providers") to provide online and offline services to the Company, to you, to other clients, or to visitors to our Website. For example, the Company may engage other companies to host, operate and maintain our Website, analyze data, provide marketing assistance, perform inventories or assessments, and provide credit information, background checks, and other services.

Third-Party Providers may include vendors who provide AI services, biometric data processing, and monitoring technologies. These providers are given access to your personally identifiable information only to the extent necessary to perform their services and are obligated to protect your information in accordance with applicable laws and this Privacy Policy.

11) Links to Other Websites

When you visit our Website, you may be directed to websites of Third-Party Providers and to other websites that are beyond our control ("Third-Party Websites"). There are many links to Third-Party Websites from our Website that may take you outside our service.

Company believes that this is one of the strengths of our Website. For example, if you "click" on a product link or Third-Party Provider link, that "click" may take you from our Website to that Third-Party Website.

If you choose to visit a Third-Party Website, you should understand that the Third party's privacy policy, and not this Privacy Policy, will govern your activities and any information you disclose while visiting that Third-Party Website.

Third-Party Websites may not have privacy policies or may have privacy policies that are not as protective of your personally identifiable information as the Company's Privacy Policy. Third-Party Websites may collect data, solicit personally identifiable information, or send cookies to visitors.

Company strongly recommends that you review and understand the privacy policies of the Third-Party Websites you visit, whether you visit Third-Party Websites directly or through a link from a page on our Website.

12) Do Not Track (DNT)

This is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. At the present time, the World Wide Web Consortium (W3C) has not yet established universal standards for recognizable DNT signals, and therefore the Company and the Website do not recognize DNT. The Company is committed to protecting your privacy and will continue to monitor developments in DNT standards and industry best practices.

13) Marketing

The Company may, subject to applicable laws, use personal information from its customers and their employees to contact them about our Website and Services, including to provide them with information on additional products from the Company that may be of interest to them.

Customer contacts may exercise choices regarding these communications as follows:

- **Email:** From time to time, the Company may send email messages to some or all of its registered users or customers. The Company may use a bulk email service to distribute that information. If you do not want to receive such emails, please indicate that preference by contacting us at privacy@RexelUSA.com. You can always limit the communications that the Company sends to you. To opt-out of commercial emails, simply click the link labeled “unsubscribe” or “opt-out” at the bottom of any commercial electronic communication we send you. Please note that even if you opt-out of promotional communications, we may still need to contact you with important information about your account.
- **Mail marketing, Telephone marketing, Surveys, and Quality control communications:** You may decide that you prefer the Company not to use your personal information to promote new and/or additional products and/or services which may be of interest to you and refuse that we contact you by mail or telephone for marketing purposes or by email or telephone for quality control purposes. If this is the case, you may advise us by contacting customer service or contacting us using the information detailed in the Contacting Us section below.

14) Online Live Chat / Mobile Application

Our Website may offer you the opportunity to chat online with a support representative. In order to use this service, you will provide us with, at a minimum, your name and email address. You may also choose to provide a photo for our mobile application product identifier. The Company cannot guarantee the security or privacy of this information.

15) Cookies and Tracking Technologies

Upon your first visit to our Website, our Website may automatically send a "cookie" to your computer. A cookie is a file that identifies you as a unique user. It stores personal preferences and user data. Cookies do not identify you by name.

The Company uses cookies to store preferences and user data. You may have your browser disable cookies; however, some Company services provided by our Website may not function properly if you disable cookies.

We may use Google AdWords® Remarketing and AI-driven analytics to advertise across the Internet and better understand user behavior. Google AdWords® Remarketing displays relevant ads tailored to you based on what parts of the Company website you have viewed by placing a cookie on your machine. THIS COOKIE DOES NOT IN ANY WAY IDENTIFY YOU OR GIVE ACCESS TO YOUR COMPUTER.

If you do not wish to participate in Google AdWords® Remarketing or AI-driven tracking, you can opt out by visiting Google’s Ads Preferences Manager or adjusting your browser settings.

16) SMS/Text Messages

The Company may send SMS/text messages with your proper consent in accordance with our SMS policy. To stop receiving marketing text messages from the Company, please reply STOP to the marketing text message you receive from the Company. This preference will only apply to the phone number in receipt of the SMS message.

No end-user data collected as part of our SMS program is sold or shared with third parties other than what is needed by our vendors to carry out SMS messaging functions.

17) Push Notifications

The Company may send you push notifications from time to time. To opt-out from the Company's push notifications, please adjust the permissions that are controlled in your mobile device. This opt-out does not apply to in-app notifications.

18) Geolocation and In-Store Location

The Company may access geolocation or in-store location information. To stop the collection of precise location information in connection with your use of our mobile applications, use your device's settings to deactivate our mobile applications' access to the device's location services.

19) Uninstall Company Applications

You may uninstall Company applications by following your standard uninstallation process in your mobile device.

20) Security

The Company uses encryption software on our Website to safeguard certain of your personally identifiable information while that information is transmitted over the Internet, including information you provide upon ordering or purchasing products from our Website.

While using our Website, you are responsible for maintaining the confidentiality of your account and password, and for restricting access to your computer.

Where applicable, the Company uses industry-standard technology in connection with our Services and on the Website to help protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

We implement industry-standard security measures to protect biometric data and data processed by AI systems from unauthorized access, disclosure, alteration, or destruction. Access to such data is strictly controlled and monitored.

21) How Long Does the Company Retain Personal Information?

Personal information that the Company collects, accesses, or processes will be retained only as long as necessary for the fulfillment of the purposes for which it was collected, unless otherwise provided for under services contracts with customers or as required or authorized by law.

Personal Data, biometric data, and data processed through AI systems will be retained only as long as necessary to fulfill the purposes for which they were collected, including compliance with legal obligations and safety requirements. Once no longer needed, such data will be securely deleted or anonymized.

22) Policy Regarding Children

The Company and its Website are not directed toward children and we do not knowingly solicit or collect personal information online from children under the age of 18 without prior verifiable parental consent. In particular, the Company complies with the Children's Online Privacy Protection Act (COPPA), which imposes specific requirements on the collection of personal information from children under the age of 13.

If the Company learns that a child under the age of 18 has submitted personal information online without parental consent, it will take all reasonable measures to delete such information from its databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law).

If you become aware of any personal information the Company has collected from children under age 18, please contact us using the information detailed in the Contacting Us section.

23) Disputes Regarding Use of Personally Identifiable Information

Any claim, dispute, or controversy (whether in contract, tort or otherwise, whether statutory, common law or equitable and whether pre-existing, present, or future) against the Company, its agents, employees, affiliates, successors, and assigns, relating to this Privacy Policy will be resolved by binding arbitration administered by the American Arbitration Association under its Commercial Arbitration Rules.

Any arbitration will be conducted before a single neutral arbitrator and will be limited solely to the dispute between you and the Company. The arbitration will be conducted in Dallas, Texas, or by telephone or online, as determined by the arbitrator.

Any award of the arbitrator will be final and binding on each of the parties and may be entered as a judgment in any court of competent jurisdiction.

This arbitration agreement shall be governed by the Federal Arbitration Act (FAA) to the fullest extent permitted by law. If any part of this arbitration agreement is found to be unenforceable under applicable law, that part shall be severed, and the remainder shall continue in full force and effect.

If any claim, dispute, or controversy is not subject to binding arbitration, you agree that the exclusive jurisdiction for that claim, dispute or controversy will be the state and federal courts located in Dallas, Texas, that you will not file any action or proceeding in any other jurisdiction; and that you waive any argument that Dallas, Texas is an inconvenient forum.

24) Limitation of Liability

THE COMPANY IS NOT LIABLE FOR ANY INDIRECT, INCIDENTAL, CONSEQUENTIAL, SPECIAL, PUNITIVE OR PHYSICAL/EMOTIONAL DISTRESS DAMAGES. IN NO EVENT WILL THE COMPANY'S LIABILITY FOR DIRECT DAMAGES EXCEED \$50.

25) Access, Objection, Correction, and Deletion

In certain jurisdictions, you may have the right to obtain confirmation as to whether your personal information is being processed, information about the purposes of that processing, and information about the recipients to whom your personal data have been or will be disclosed.

You may also have the right to receive a copy of the personal data you have provided and/or request its deletion.

You have the right to be informed about the collection and use of your biometric data, to consent to or object to its processing where required by law, and to request human review of decisions made solely by automated processing, including AI.

Our customers are responsible for managing any request made by their employees or customers regarding access to and rectification of their personal information that is transferred to us. However, if you have questions about your rights, please feel free to contact us using the contact information detailed in the Contacting Us section below.

26) Privacy Rights in Certain States

The laws of certain states, including but not limited to the California Consumer Privacy Act and California Privacy Rights Act (CCPA/CPRA), the Virginia Consumer Data Protection Act (VCDPA), the Colorado Privacy Act (CPA), the Connecticut Data Privacy Act (CTDPA), and the Utah Consumer Privacy Act (UCPA), provide their residents with specific rights regarding their personal information. These rights may include:

- The right to know what personal information we have collected, used, disclosed, and sold or shared about you;
- The right to request access to your personal information that we have collected;
- The right to request deletion of your personal information, subject to certain exceptions;
- The right to opt-out of the sale or sharing of your personal information, where applicable;
- The right to correct inaccurate personal information;
- The right to obtain a copy of your personal information in a portable and readily usable format;
- The right to not be discriminated against for exercising your privacy rights.

Where applicable under state privacy laws, you have the right to receive a copy of your personal information that you have provided to the Company in a structured, commonly used, and machine-readable format. This right allows you to transfer your personal information to another service provider or entity, where technically feasible. Please note that this right applies only to personal information you have directly provided to us and does not include information inferred or derived by the Company.

To submit a request to exercise any of these rights, you may contact us by calling (888) 889-9826 or emailing privacy@RexelUSA.com. You may also designate an authorized agent to make a request on your behalf by contacting us at the same email address.

When you submit a request, we will verify your identity to protect your privacy and security. Your exercise of these rights will not result in any adverse effect on the price or quality of goods or services provided by the Company.

Please note: If you are a customer of one of our customers, you should contact them first concerning your privacy rights under the applicable state laws.

27) Right to Lodge Complaints

The Company is transparent about the ways in which it collects and uses personal information, and welcomes your questions and concerns.

If you have any concern or complaint about the way the Company handles your personal information, please contact us as described below.

To the extent you believe the Company has not addressed your concerns or otherwise choose to do so, you have the right to lodge a complaint with a supervisory authority in the country where you reside and/or in the United States.

For information on how you can file a privacy complaint with the Federal Trade Commission, please visit: <https://www.ftccomplaintassistant.gov/>.

28) Data Breach Notification

The Company takes the security of your personal information seriously and has implemented reasonable administrative, technical, and physical safeguards to protect it from unauthorized access, disclosure, alteration, or destruction. In the unlikely event of a data breach that compromises your personal information, the Company will promptly take appropriate measures to investigate and mitigate the breach. Where required by applicable law, we will notify affected individuals, regulatory authorities, and other relevant parties in accordance with applicable data breach notification laws.

If you believe your personal information may have been compromised, please contact us immediately at privacy@RexelUSA.com or by phone at (888) 889-9826.

29) Miscellaneous

The Company's policy does not extend to anything that is beyond the Company's reasonable control, including but not limited to potential insecurities inherent in the operation of the Internet.

The Company uses reasonable precautions to keep your personally identifiable information secure, whether it was collected online or offline. However, the Company is not responsible for any breach of security or for the actions of any third parties.

While we use AI and monitoring technologies to enhance safety and service quality, these systems are not infallible and may occasionally produce errors. We encourage users and employees to report any concerns or discrepancies to us promptly.

If you at any time have questions about this Privacy Policy, please send your question via email to privacy@RexelUSA.com.

30) Policy Changes

The Company reserves the right to change this Privacy Policy at any time. We will post any revisions to this Privacy Policy on our Website and will provide a paper copy to you upon your request.

Please review the Privacy Policy on our Website or follow the instructions in the “Contacting Us” section below to submit a request.

Your use of our Website or any of our offline services will be subject to our Privacy Policy in effect at that time.

31) Contacting Us

If there are any questions regarding this Privacy Policy or to request a copy of this Privacy Policy in another format, you may contact us using the information below:

Rexel USA, Inc.

VP Legal, Privacy

5429 LBJ Freeway, Suite 600

Dallas, TX 75240

Phone: (972) 308-9811

Email: privacy@RexelUSA.com

LAST UPDATED: August 26, 2025

© 2025 Rexel USA, Inc. All Rights Reserved.