

## Privacy Policy

### Introduction

Welcome! This Privacy Policy is designed to tell you how this website ("Site") collects, uses, and discloses the information you provide via this Site and the choices you have regarding our use of, and your ability to correct, that information. By using this Site, you acknowledge that you have reviewed, and agree to, the terms of this Privacy Policy and the Terms of Use. If you do not agree to this Privacy Policy and the Terms of Use, do not use this Site.

Steelcase also adheres to the EU Safe Harbor Privacy Principles published by the US Department of Commerce ("Safe Harbor") with respect to certain personally identifiable information that it receives in the United States about European Union ("EU") residents. Information about Steelcase's participation in Safe Harbor can be found in the section set out below entitled "Safe Harbor Participation".

### Scope of Privacy Policy/Links

Although this Site may provide you with links to other websites, including those of our affiliates, business partners and/or service providers, those websites are not covered by this Privacy Policy. We strongly encourage you to read the privacy policy of every website you visit, including those websites to which this Site provides links. Whenever you link to any other website from this Site, you are solely responsible for any interactions you may have with that website. Links from this Site to other websites will typically open in a separate browser window while the browser window for this Site remains open in the background.

This Site provides a link to a third-party website that allows you to enroll for electronic delivery of our proxy statement, annual report, and related materials as an alternative to receiving such materials by mail. This third-party website gathers certain personally identifiable information (e.g., your Social Security Number and email address) to process your enrollment. Even though this third-party website may be branded with the Steelcase logo, it is operated by Investor Communication Services ("ICS") and any information you submit through that website is subject to the terms of ICS's website privacy policy, which is available at [www.icsdelivery.com](http://www.icsdelivery.com). Our Privacy Policy does not apply to the ICS website.

### Who Should Use this Site

The Site is hosted in the United States and contains general information that is appropriate for global access and use. If you are under the age of 18, you may use our site with the involvement of a parent or guardian. This Site is not intended for use by children under the age of 13, and we will not knowingly collect personally identifiable information from such individuals.

### Active Information Collection

At various points on this Site, you might choose to actively provide certain kinds of information, including personally identifiable information, such as full name, address, phone number, e-mail address, etc. The Site typically will indicate which information is required and which information is optional at each active information collection point. In any case, by submitting information via an active information collection point at this Site, you specifically consent to the collection, use, and dissemination of such information in accordance with this Privacy Policy.

Active information collection points at this Site may include:

#### *Email Reply Mechanisms*

This Site may provide you with one or more e-mail reply mechanisms through which you may submit questions or comments. Information you provide via such e-mail reply mechanisms is typically optional. We may use the information you provide in your e-mail to respond to your inquiries and we reserve the right to retain whatever information you submit in your e-mail.

including your name, e-mail address, and any comments or other information that you send via the e-mail reply mechanism, in order to better serve you should you contact us again.

#### *Question, Comment, and Feedback Forms*

This Site may include a form for you to use in submitting questions, comments, and other feedback about us, our affiliates, this Site, or our affiliates' products and services, and other topics. We use such feedback information to improve this Site, and our affiliates' products and services as well as for marketing and research purposes. Most information you provide in such forms is optional, but you will need to provide at least some personally identifiable information, such as your name, address, e-mail address, and phone number, so that we may respond to your inquiry.

#### *Product Information, and Catalog Request Forms*

This Site may include a form that you can use to request information about us, our affiliates, or our affiliates' products and services, or to request catalogs or brochures. In addition to asking you to identify the specific information or materials in which you are interested, these forms may request, among other things, your name, address, and e-mail address, so that we may send you the information or materials you request. These forms may also request certain demographic information about you to help us better understand your interests and needs.

#### *Software Download Form*

This Site may include a form that you must complete before receiving a software download from the Site. This form may request, among other things, your name, address, and e-mail address. The form also requests certain information about the computer systems you are using. We use this information to keep track of software downloads and to learn more about what computer systems and configurations visitors to the Site use. We also may use this information to send you updated versions of the software as they become available and to notify you of problems with the software.

#### *Surveys and Evaluations*

The Site may ask you to complete optional surveys and evaluations about us, our affiliates, this Site, or our affiliates' products and services, and other topics. These surveys and evaluations might request personally identifiable information, such as your name and e-mail address, so that we can follow up with you. Typically, we use such surveys and evaluations to better understand our customers and their preferences.

#### *Registration Forms*

Because access to portions of this Site is restricted to authorized users, you may be required to complete a registration form. This form may ask you for a variety of information that will help us to identify you and contact you, such as your name, business address, office e-mail address, office phone number, and your relationship to us. Where you could be using the Site to place orders, we will also ask you for billing and shipping information. Registration information will be associated with your username and password, without which you will not be able to access the restricted portions of the Site.

#### *Job Seeking*

This Site allows you to search our available jobs, create a profile for inclusion in our talent pool, and submit an application for an open job position.<sup>1</sup> You will be asked to provide personally identifiable information, including your name, address, e-mail address, and phone number in connection with your previous work experience, salary expectations, and other relevant employment information. The information you submit can be accessed on this Site only with your username and password. We may use and disseminate this information internally and among our affiliates as necessary to review your qualifications and inform you of relevant job opportunities and/or to consider your application for a specific job opening and to contact you regarding our recruitment process. We do not use or disclose this information other than for the purposes described here. To comply with various government recordkeeping requirements, the application may also ask you to provide certain other optional categories of demographic information about yourself. Providing or not providing such demographic information will not adversely affect your

employment prospects, and such information will not become part of your employment application.

#### *E-Mail Newsletters, Alerts, or Reminders*

The Site may ask you to provide your e-mail address so that you can receive e-mail newsletters, alerts, or reminders about us, our affiliates, our Site, or our affiliates' products and services, and other topics of interest. If you no longer wish to receive such e-mails, please follow the "unsubscribe" instructions included in such e-mails or contact us as described in the "Ask Us" section, below.

#### *Purchasing/Order Processing*

This Site may allow you to purchase certain products and services online. In such case, the Site gathers personally identifiable information (e.g., your name and address) and payment information (e.g., your credit card number) to process your order. Specifically, we may: (i) use and disclose the information you provide as necessary to process and ship your order (e.g., by disclosing your name and address to fulfillment houses and delivery services such as UPS or Federal Express, (ii) use the personally identifiable information you provide to notify you about the status of your order, (iii) retain this information (other than payment information) to create an account for later use (so that you do not need to re-enter the information for each subsequent order); (iv) group your de-identified information with that of other Site users to provide information to us about group purchasing and preferences; and (v) share this information (other than payment information) with our affiliates, business partners, and dealers.

#### *Leasing Credit Application*

The Site may include an online commercial credit application for businesses interested in leasing our products. Among other things, this application asks for your business's name, address, and phone number, the nature of the business, certain insurance information, background and credit information about the officers and owners of your business. Steelcase Financial Services uses the information you provide to evaluate, and contact you regarding, your credit application. Steelcase Financial Services does not share this information with any third party without your express permission except as necessary to review your credit application and obtain credit decisions.

#### *My Steelcase*

The "My Steelcase" area of the Site allows you to establish a personalized account to organize contact information, create folders for storing your favorite pages of the Site, and to receive news about our company, our affiliates, and our affiliates' products and services. My Steelcase also allows you to e-mail pages of the Site to others. To register for My Steelcase, you must provide some personally identifiable information, including your name and e-mail address. You may also choose to provide optional information, including your address and phone number. We use the information you submit on the My Steelcase registration form to automatically fill out other online forms on the Site that you want to submit and to help maintain your My Steelcase account. When you wish to send an e-mail to someone through My Steelcase, we use the recipient's e-mail address only to send the requested e-mail and for no other purpose.

#### *Other Functions*

This Site may offer search functions, calculators, or conversion tools that help you learn more about various topics. We use the information you input while using these functions to provide you with immediate feedback.

#### **Passive Information Collection**

This Site uses various technologies to passively collect information from you while you are visiting (that is, you do not actively provide this information). Such technologies allow the Site to collect a range of non-personally identifiable information, including your Internet Protocol (IP) address (a unique identifier automatically assigned to your computer when logging onto the Internet), the type of Web browser and operating system you use, the date and time you visit the Site, the specific pages you visit on the Site, and the address of the website you visited before coming to this Site. We typically use such passively collected information for a variety of purposes, such as to administer the Site, customize the Site to your preferences, and compile aggregated statistics for marketing and research purposes. We do not compile any personally identifiable information with

the passively collected information that we collect on the Site. We reserve the unrestricted right to use this passively collected, non-personally identifiable information, including, but not limited to, selling, leasing, permitting access to, or otherwise transferring it to our affiliates, business partners, advertisers, dealers, and other third parties.

Passive information collection technologies that deserve special mention:

#### *Cookies*

"Cookies" are small text files that store information about your interactions with a particular website, either temporarily (known as a "temporary" or "session" cookie, and deleted once you close your browser window) or more permanently on the hard drive of your computer (known as a "permanent" or "persistent cookie"). Cookies can make it easier to use a website by allowing servers to access certain information quickly.

This Site uses both session/temporary cookies and persistent/permanent cookies to store information that allows us to offer you better customer service and to navigate through the Site with ease. Session cookies can be used to customize a website for a user, such as by storing passwords, preferences, and registration and account information. Persistent cookies eliminate the need for users to reenter information each time they visit a website. Note that if you configure your browser to reject cookies, you might not be able to access important functions or areas of the Site or enjoy certain conveniences at this Site.

#### *Web Beacons*

Web beacons (also known as single-pixel GIFs, clear GIFs, invisible GIFs, and 1-by-1 GIFs) are internet tags that are smaller than cookies and tell the website server your IP address and browser type and help us to identify what pages you use on the Site.

#### *Active-X Programs*

Active-X programs are executable programs transferred to your hard drive that cause your computer to perform complimentary functions in connection with your visit to the Site. Active X controls are required for Flash programs such as a home page banner.

#### **Other Uses and Disclosures of Information/Opt-Out**

As indicated above, we use information we collect from you via this Site for a variety of purposes. Unless otherwise provided above, we may also use personally and non-personally identifiable information you submit via this Site in the following ways:

- to tell you about new products and services or other information we think may be of interest to you. If you do not wish to receive such notifications or updates, please contact us as described in the "Ask Us" section, below, and specify which notifications or updates you do not wish to receive;
- to conduct internal marketing and research; and
- to improve the content of the Site.

From time to time, our service providers may have access to information you submit via the Site to provide operational or other support services for the Site (e.g., Web hosting or database services). We have put in place agreements with such service providers to protect against unauthorized uses or disclosures of such information.

Except as otherwise provided in the "Active Information Collection" section above, we also reserve the right to sell, lease, provide access, or otherwise transfer personally identifiable information you submit via this Site to our business partners (including e-mail delivery services and content providers), affiliates, and dealers for the purposes described in this Privacy Policy.

Notwithstanding anything to the contrary in this Privacy Policy or elsewhere on this Site, we reserve

the right to share or transfer any information you submit via this Site to another person or company in connection with the sale, assignment, or other transfer of the business of this Site and/or Steelcase Inc.; to respond to law enforcement requests; or where required by applicable law, statute, regulation, ordinance, subpoena, or court order. By submitting personally identifiable information via this Site, you consent to such disclosures in accordance with this Privacy Policy.

### **Accessing and Correcting Your Information**

We take reasonable measures to ensure that personally identifiable information that we collect from you via this Site is accurate, current, complete, and reliable for its intended uses. If you wish to update or otherwise correct personally identifiable information you have provided to us, please resubmit the applicable form on the Site with the updated information or contact us as described in the "Ask Us" section, below.

We will make reasonable efforts to respond to your inquiry, but we may require follow-up or contact information to allow us to verify that you are the person authorized to view the information you are requesting. We may, in our discretion, refuse to allow you access to certain information if, in our view, to provide such access would jeopardize another person's privacy; would violate any applicable federal, state, or foreign law, regulation, or directive; or would unreasonably burden this Site.

### **Data Security**

Although we take steps to protect personally identifiable information you provide via this Site from loss, misuse, or unauthorized alteration, no system is 100% secure or error-free. Therefore, we do not, and cannot, guarantee the security or accuracy of the information we collect via this Site, and you acknowledge that you are assuming the risk in transmitting any information to us.

We use the SSL (Secure Socket Layer) industry standard for encrypting all online ordering and credit card payment information. SSL encryption technologies provide one of the highest levels of security available today for web-based sales. You should be aware that other transmissions submitted via this Site (e.g., forms, e-mails, etc.) are not protected by the same security measures we use for online ordering. As a result, you should be particularly careful in deciding what information you wish to send to us in other transmissions.

It is your responsibility to safeguard any usernames and passwords you use to access portions of this Site and to notify us if you ever suspect that these usernames or passwords have been compromised. You acknowledge that you are solely responsible for any unauthorized use of this Site conducted via your username or password.

### **Ask Us/Enforcement of this Privacy Policy**

If at any time you have questions, comments, or concerns about this Privacy Policy, or the information practices of this Site, please contact us in one of the following ways:

E-Mail:

**Use the Ask Us form provided on this Site**

Mail:

**DotCom  
PO Box 1967  
GH-2E-10  
Grand Rapids, MI 49501**

Phone:

**1-800-333-9939**

attention.

### **Changes to this Privacy Policy**

If this Privacy Policy changes, the revised Policy will be posted here and the date of the newest version will be posted below. Please check back frequently, especially before you submit any personally identifiable information at this Site, to see if the Privacy Policy has changed.

### **Safe Harbor Participation**

We recognize that the European Union ("EU") has an "omnibus" data protection regime established pursuant to the European Data Protection Directive (95/46/EC) (the "Directive"). The Directive generally restricts the transfer of personally identifiable information about individuals in the EU to the United States, unless there is "adequate protection" for such information when it is received in the United States. To address this restriction, we adhere to Safe Harbor with respect to personally identifiable information about individual contacts for our customers, dealers and vendors in the EU ("EU Personal Information") for the purposes described below, as well as for our employees in the EU. Employees in the EU are provided with information regarding Steelcase's employee data privacy practices and Safe Harbor via a separate policy.

#### *Collection, Use, and Disclosure of EU Personal Information*

Steelcase collects, uses, and discloses EU Personal Information in the ordinary course of its business. In particular, Steelcase may obtain in the US the following types of EU Personal Information about individual contacts for customers, dealers, and vendors ("EU Data Subjects"): name, work contact information (phone, fax and pager numbers, address, and email address); title; job responsibilities and performance data (sales, product purchase history and the like); data regarding portfolios, CVs and prior projects; product and service purchase history; transactions data (transaction amounts, loans, interest rates and payment history) (vendor and dealer contacts only); additional financial data (credit reports and/or credit scores, credit references, bank account balances and assets) (vendor contacts only); tax ID number, social insurance number or similar tax identification number (vendor contacts only); data about office furniture or other office configuration information (customer contacts only); and usernames and passwords (dealer contacts only).

We may use such EU Personal Information for the following purposes: fulfillment and tracking of orders; tracking of payments and otherwise ensuring payment; assessing performance and making assessments about future purchases (vendors and dealer contacts only); reporting a default in loan payments to credit reporting agencies; making decisions regarding extensions of credit; providing access to Steelcase informational internet forums (dealers only); and performing direct marketing activities and otherwise communicating information regarding Steelcase products or services (customer contacts only, where permitted by law).

Steelcase may disclose EU Personal Information to its affiliates, subsidiaries, business partners, and service providers for the purposes listed above. In situations where Steelcase discloses EU Personal Information to any third parties acting as service providers or "agents" on behalf of Steelcase, Steelcase will require the recipient to protect the disclosed EU Personal Information in accordance with the relevant Safe Harbor Principles, or otherwise take steps to ensure that the EU Personal Information is appropriately protected. With respect to any sharing of EU Personal Information for purposes of marketing Steelcase products and services, Steelcase obtains promises from its affiliates, subsidiaries and business partners that such entities will use and disclose such EU Personal Information for purposes of marketing Steelcase products and services only. In certain situations, EU Data Subjects may seek to opt-out of disclosures of their EU Personal Information by contacting Steelcase at [safeharbor@steelcase.com](mailto:safeharbor@steelcase.com).

#### *Data Processor Activities*

In certain situations, Steelcase may obtain access to information about its customers' employees and other end users in the EU for the purpose of providing consulting services about office furniture configuration and other matters for such customers ("EU Processor Information"). These customers

transferred to Steelcase in the United States. Steelcase acts as a data processor on behalf of its customers with respect to such EU Processor Information and accordingly carries out their instructions with regard to the collection, processing, and protection of EU Processor Information.

*Data Security, Integrity and Access*

Steelcase takes reasonable precautions to protect EU Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Steelcase makes reasonable efforts to keep EU Personal Information reliable for its intended use, accurate, current and complete. Steelcase also provides EU Data Subjects with the opportunity to access, review and correct their own EU Personal Information, and otherwise provides such individuals' access to EU Personal Information in accordance with Safe Harbor. Individuals may contact the Steelcase Safe Harbor Privacy Contact identified below to review EU Personal Information about them. However, such individuals may first wish to contact their own company with questions regarding EU Personal Information shared with Steelcase, as that might be the most efficient means of addressing such issues. Steelcase reserves the right to take reasonable steps to authenticate the identity of any such individual seeking access to EU Personal Information.

*Other Disclosures*

Steelcase may disclose EU Personal Information as necessary in connection with the sale or transfer of all or part of its business, where required or permitted by law, where Steelcase believes that such disclosures are appropriate in connection with a law enforcement request or otherwise permitted by Safe Harbor, or in order to investigate, prevent or take action regarding illegal activities or suspected fraud or enforce or apply Steelcase agreements.

*Questions*

Any questions regarding this Safe Harbor section of this Privacy Policy or requests for access to EU Personal Information should be directed to the Safe Harbor Privacy Contact listed in this section. Additional information may be obtained on the US Department of Commerce website at <http://www.export.gov/safeharbor>. In addition, if any individual located in the EU experiences an issue regarding the EU Personal Information that Steelcase holds about him or her, the individual may contact the local data protection authority for further information.

**Safe Harbor Privacy Contact**

[safeharbor@steelcase.com](mailto:safeharbor@steelcase.com)

Updated and effective June 2, 2010.