

BUSINESS DATA USE STATEMENT

INTRODUCTION

MRC Global Inc. and its subsidiaries and controlled affiliate companies (together “MRC Global”, “we”, “our” or “us”) are committed to (a) protecting the privacy of information that parties with whom we do business (each a “Business Counterparty” or “you”) provide us and (b) complying with applicable data protection and privacy laws globally.

This Business Data Use Statement (this “Statement”) details how we collect, use and manage the business information that Business Counterparties provide us (“Data”).

Our general Privacy Statement (available at www.mrcglobal.com) is separate from this Statement. We are a business-to-business distributor of products and provider of business services rather than a consumer organization. We retain limited information regarding the personal details of individuals, such as employees or representatives of Business Counterparties. These details would include items like business contact information, title, *etc.* Rather, the information that this Statement addresses is information that the organizations of Business Counterparties provide us or we otherwise collect or receive. Our policies regarding individuals are addressed in our general Privacy Statement rather than this Statement.

BY PROVIDING DATA TO US, YOU AGREE THAT THE DATA THAT YOU PROVIDE SHALL BE SUBJECT TO THE TERMS OF THIS STATEMENT. NOTWITHSTANDING THE PRIOR SENTENCE, THE CONFIDENTIAL INFORMATION SECTION BELOW SHALL BE USED TO INTERPRET AND CONSTRUE ANY PRIOR CONFIDENTIALITY OR NON-DISCLOSURE AGREEMENT CONTAINED IN A CONTRACT OR AGREEMENT FOR THE PURCHASE OR SALE OF PRODUCTS.

DATA COLLECTION

We may source, collect, use and otherwise process Data in different ways. MRC Global collects Data from a range of Business Counterparties in the context of our business activities, including through representatives of our Business Counterparties and their respective advisors and consultants.

The types of Data we may collect from a Business Counterparty include (among others):

- Information that a Business Counterparty discloses regarding it or its business in communications via telephone, letter, email, text messaging, other smart phone, tablet or computer applications, social media, filings with government or regulatory agencies or court or arbitration proceedings or in meetings
- Information collected from due diligence or credit checks and clearance questionnaires
- Feedback from a party about our products and services, including our websites
- Filings or notices that our Business Counterparties may provide us through our agents for service of process or a commercial register

We collect Data from Business Counterparties through our websites in the following situations:

- a Business Counterparty completes one of the “Contact Us” forms, which appear on many pages of our websites or clicks on the “Email” tab
- a Business Counterparty uses one of the customer or supplier tools available through our websites, portals, applications or MRCGO® and submits information through these tools

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- a Business Counterparty registers with us to receive alerts

When collecting information that might be used to contact a Business Counterparty about products or services, we provide the opportunity for representatives of the Business Counterparty to opt out from receiving such communications.

We collect Data from our Business Counterparties when we order products from suppliers, or when we sell products and services to customers for their use or on behalf of their end users, whether orally, through electronic communications, electronic data interchange transactions or our or our suppliers' or customers' websites or electronic portals, including third party purchasing portals. Data may be included in requests for proposal or quotes, proposals or quotes, orders, order acknowledgements, shipping documentation, packing lists or invoices. This Data may include (among other things) terms and conditions of supply, pricing, types and quantities of product ordered, material test records, safety data sheets or product specifications.

DATA USE

We only use Data collected from a Business Counterparty for legitimate business-related purposes, including (among others):

- To respond to queries or requests from a Business Counterparty
- To process a Business Counterparty's order
- To perform any contract between a Business Counterparty and us
- To establish and manage our relationship with our customers, suppliers and other Business Counterparties
- To market our products and services
- To acquire products to sell to our customers
- To develop and improve our products and services or those of our suppliers; to study and understand how our products and services, and accounts, are being used; and to understand the market in which we operate
- To enhance our computer information systems, customer and supplier interfaces and business processes and to otherwise optimize and create more efficient operations
- To otherwise conduct, develop and grow our business; and promote our products and services
- To manage accounts and records
- To conduct credit and other clearance procedures
- To provide information to our lenders, debt and equity investors and other financing sources to allow us to obtain financing for our business
- To provide information to our auditors to support their audit of our financial statements and applicable business processes such as those regulated under the United States Sarbanes-Oxley Act of 2002, as amended
- To provide information through the filings we make with the United States Securities Exchange Commission and other applicable governmental entities
- To manage security, and for risk and crime prevention
- To support our corporate social responsibility activities and company policies
- For the exercise or defense of any legal claims or to obtain legal advice
- To prepare tax returns and pay our taxes

- To comply with any law or regulation that is applicable to us and our operations

DISCLOSURE OF DATA

MRC Global may disclose Data (other than Confidential Information (defined below)) to others necessary or desirable for MRC Global to conduct its legitimate business activities. For instance, we may disclose a Business Counterparty's Data, for the following purposes:

- To third-party suppliers or providers who use Data to provide products and services to us or our customers or their end users
- If MRC Global decides to sell, buy merge or otherwise reorganize all or part of its businesses
- To protect any intellectual property rights in any materials displayed or otherwise available from our websites, portals and apps
- To respond to a legal request or comply with a legal obligation
- To enforce MRC Global's website terms of use contained in the "Legal Statement" available on our websites, portals and apps
- To assist providers that help us generate and collate reviews in relation to our goods and services
- To our advertising and promotional agencies and consultants and those organizations selected by us to carry out marketing campaigns on our behalf

It is our goal to limit disclosure of Data to others for those uses necessary or desirable to further MRC Global's legitimate business activities, including those uses described in "Data Use" above. We will not disclose specific transactional data (such as invoices and orders) regarding customers to other customers and the public or regarding suppliers to other suppliers and the public if a disclosure causes material harm to the customer or supplier. However, in competitive bidding situations, we may approach various suppliers regarding pricing, specifications and other Data in an effort to obtain the best product at a competitive price and terms and conditions for a customer or its end user. Likewise, we may set and disclose our prices and provide technical specifications, model numbers, material test records, safety data sheets and other Data necessary to market and sell products and services, in each case, to the general public.

MRC GLOBAL CONSULTANTS, COUNSEL, FINANCING PARTIES, CONTRACTORS, ETC.

Additionally, MRC Global may disclose Data, including Confidential Information, to any party that has a duty of confidentiality to MRC Global and a reason to utilize Data for MRC Global's business, including (without limitation) the following:

- asset-based lenders and banks;
- professional advisors such as auditors, accountants, tax advisors, insurance brokers and attorneys
- consultants and contractors
- technical support providers who assist with our website and IT infrastructure
- third party software providers, including 'software as a service' solution providers, where the provider hosts relevant Data on our behalf
- providers that help us store, collate and organize information effectively and securely, both electronically and in hard copy format, and for marketing purposes

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CONFIDENTIAL INFORMATION

“Confidential Information” means Data that:

- a Business Counterparty has marked or clearly and specifically identified as confidential or proprietary; and
- MRC Global has agreed in a binding contract to maintain in confidence.

If the Confidential Information includes a trade secret, then the Business Counterparty must announce and identify it as a trade secret at the time of disclosure. Notwithstanding the foregoing, “Confidential Information” does not include Data that:

- is, or becomes, publicly available without improper disclosure by MRC Global;
- is received from a third party without violation of a duty of confidentiality;
- was in MRC Global’s possession prior to the Business Counterparty’s disclosure and MRC Global’s agreement to maintain the Data’s confidence; or
- is required to be disclosed by us in response to a court or governmental order or is required by be disclosed by law or stock exchange rule or must be practically disclosed to our investors upon advice of legal counsel to comply with securities laws.

Subject to the other provisions of this Statement, MRC Global will protect Confidential Information using the same degree of care used to protect MRC Global’s own confidential or proprietary information and will not disclose it to third parties except for those third parties that have a reason to know for MRC Global to conduct its business and who have a similar duty of confidence to protect and maintain the confidence of the Confidential Information. See “MRC Global Consultants, Counsel, Financing Parties, Contractors, Etc.” above.

DATA RIGHTS

Business Counterparties and MRC Global may each have rights to use Data that are not exclusive or may have intellectual property rights in certain Data such as trademarks, copyrights, trade secret rights or patents or licenses regarding Data use.

INTERNATIONAL TRANSFERS OF DATA

Data collected on our websites, portals, computer systems and apps may be stored and processed in the United States or any other country in which MRC Global operates worldwide. We do this under our Data Transfer Agreement, which provides for data protection wherever the Data is physically kept. In addition, we may store data with third party processors in a hosted, cloud or software-as-a-service environment under contracts we have with third party processors.

SECURITY

MRC Global is committed to protecting the security of Data that Business Counterparties provide to us. While no security measure can guarantee absolutely against a data breach, we use a variety of security technologies and procedures to help protect data from accidental or unlawful destruction, accidental loss, unauthorized access, destruction, misuse, modification or disclosure.

DATA RETENTION

We hold Data for as long as necessary to fulfill the purposes for which it was collected, before making it non-identifiable or deleting it in accordance with our internal record retention policy



and data backup processes. We may also hold Data as well to satisfy applicable legal holding requirements.

LINKS TO OTHER WEBSITES

Our websites may contain links to those of other third party companies. These websites operate independently from our websites and are not subject to this Statement. Every Business Counterparty should review the privacy statements of those websites to determine how other third parties use and protect data.

QUESTIONS

If a Business Counterparty has any questions or concerns regarding this Statement or our handling of business information, it may contact us through the "Contact Us" page on our websites or by emailing dataprivacy@mrcglobal.com.

CHANGES TO THIS BUSINESS DATA USE STATEMENT

MRC Global may update this Statement from time to time. When we do, we will revise the effective date at the top of the Statement.