

# General Privacy information

*Last updated: January 2025*

SSAB is bound by the privacy legislation within each jurisdiction in which it operates. Sometimes the privacy legislation and the data subject's rights in relation to privacy differs from one jurisdiction to another. In addition, specific privacy practices may be adopted to address the specific privacy requirements of particular jurisdictions. Therefore, if the privacy notices are in conflict with the law of the jurisdiction in question, the local law takes precedence to the extent applicable.

SSAB has nominated a Group Data Protection Officer (DPO), who can be contacted for additional information or any inquiries or requests on personal data processing by SSAB. More information can be found in section nr. 2.

## 1. Data Controller

The data controller responsible for the SSAB group's personal data processing activities is SSAB AB (registration number: 556016-3429, address: P.O. Box 70, SE-101 21 Stockholm, Sweden). This includes accountability for all data processing on a corporate level. SSAB is responsible for ensuring that personal data is processed in compliance with these notices and applicable data protection laws.

In addition, other SSAB group companies can be regarded as the data controller in separate contractual or other cooperation relationship or in connection with certain statutory personal data processing and compliance with local legal requirements of an individual legal entity part of the SSAB group. SSAB group companies also share personal data for administrative purposes and to facilitate the business operations of the group and the individual legal entities. The information of [SSAB group companies](#) and affiliates can be found in the latest [Annual Report](#). Regardless of the data controller in a specific situation, the primary contact for privacy matters at SSAB is the SSAB Group Data Protection Officer.

## 2. Data Protection Officer's (DPO) contact details

SSAB's global Data Privacy Organization supports with any data protection and data privacy related requests or any other questions, concerns, comments or complaints.

SSAB has also nominated a Group Data Protection Officer (DPO) who performs the following tasks:

- Informs and advises SSAB organization and its employees about obligations pursuant to the EU General Data Protection Regulation (GDPR) and to other Union or Member State data protection provisions in relation to the data processing carried out by SSAB,
- Monitors compliance with the GDPR and with other Union or Member State data protection provisions and with SSAB's policies related to the protection of personal data,

- Takes care of assignment of responsibilities, data protection awareness and training of employees involved in processing operations, and the related audits, and
- Provides advice on data protection impact assessments and monitoring their performance.

The DPO also co-operates with the supervisory authority and acts as the contact point for the supervisory authority on issues relating to processing, and to consult, where appropriate, regarding any other matter.

SSAB's Data Privacy Organization and the Group Data Protection Officer (DPO) can be contacted at [data\\_privacy \(at\) ssab . com](mailto:data_privacy@ssab.com).

### **3. Transfer or disclosure of personal data**

SSAB may transfer or disclose individuals' personal data to the following third parties:

- other SSAB group companies for internal processing;
- when permitted or required by law to comply with requests by competent public authorities such as subpoenas or similarly binding acts;
- trusted service providers or SSAB partners, such as suppliers, agents, distributors and marketing service providers.
- if SSAB is involved in a merger, acquisition, or sale of all or a portion of its assets; and
- when SSAB believes in good faith that disclosure is necessary to protect SSAB's rights, protect individuals' safety or the safety of others, investigate fraud, or respond to a government request.

Third parties may act as independent data controllers, or data processors, depending on the case.

## **4. Transfer of personal data outside of the EU/EEA**

### **4.1 Intra - group transfers**

As some SSAB group companies are located outside of the EU/EEA, individuals' personal data may be transferred outside of EU/EEA. In these circumstances, SSAB will use the required established mechanisms for the transfer outside of the EU/EEA, such as the Standard Contractual Clauses approved by the European Commission.

### **4.2 Service providers and other data recipients located outside of the EU/EEA**

SSAB may use service providers for the personal data processing and personal data may be transferred to countries outside of the EU/EEA. SSAB will use the required established mechanisms that allow the transfer of personal data to third countries, such as the Standard Contractual Clauses approved by the European Commission and additional safeguards.

## **5. Security**

SSAB maintains adequate physical, technical and organizational security measures to protect personal data from loss, destruction, misuse, and unauthorized access or disclosure. For example, SSAB limits access to this information to authorized employees and contractors who need to know that information in the course of their work or assignment and to third party service providers who may only process data in accordance with instructions provided by SSAB.

Please be aware that although SSAB endeavors to provide adequate security measures for personal data, no security system can prevent all potential security breaches.

## **6. Your privacy rights**

Based on the applicable data protection laws, you may be entitled to exercise privacy rights in relation to your personal data to which SSAB acts as a data controller. You may have, subject to applicable laws, the right to:

- receive confirmation on whether your personal data is being processed, and if so, obtain access to that personal data;
- request correction of any inaccuracies regarding your personal data;
- request deletion of your personal data;
- request restriction of processing of your personal data;
- data portability of your actively provided personal data;
- object processing of your personal data based on reasons specific to your situation;
- withdraw your previously given consent for processing your personal data.

Please note that in certain circumstances, local laws and legislations may limit the exercise of specific privacy rights. For exercising your rights, please contact the SSAB's Data Privacy Organization at [data.privacy@ssab.com](mailto:data.privacy@ssab.com). In addition, you always have the right to approach, make a request or file a complaint to the competent data protection authority.

## **7. Changes to privacy notices**

From time to time, SSAB may amend privacy notices and SSAB recommends you to regularly access them to find about the latest version. Please note that these privacy notices are for information purposes only. When required, SSAB will inform individuals of any substantial changes by using reasonable and available channels.

# Job applicants

## 1. Legal basis and purpose of processing personal data

SSAB processes personal data of job applicant for the following purposes, which are explained below.

PROCESSING ACTIVITY	LEGAL BASIS	DESCRIPTION
Recruitment	Legitimate interest	SSAB processes personal data of job applicants in order to interview and recruit new employees and to manage other administrative duties related to the recruitment process.
Hiring and preparation of employment contracts	Legitimate interest	Preliminary information required for hiring purposes and the initial stages of preparing an employment contract. However, if the recruitment leads to employment, SSAB needs to receive some additional personal information from the applicant. This information is directly collected from the individual in question. More information detailed in Employee privacy statement.
Candidate pool	Consent	A job applicant might also be interested in other positions than the initially applied position. In this case, the applicant can give their consent to receive emails about job-related news and be contacted whether other positions are opened.
Information and facility management	Legitimate interest	SSAB may process technical data, including some personal data for information security and access surveillance purposes and fraud prevention. SSAB maintains also information and facility security measures to safeguard health and safety as well as business information and business assets in order to avoid injuries at its facilities, to prevent property damage and criminal activities and to ensure the availability of the websites and services. This is to ensure an appropriate level of network, facility and information security and the safety of others.
Information security	Legitimate interest	SSAB maintains information security measures for information security purposes to safeguard business information and business assets, to avoid criminal activities and ensure availability of the services.

## 2. Collection of personal data

Necessary personal data collected for the recruitment purposes includes among others:

PERSONAL DATA	EXAMPLES
Contact details	Name, postal address, phone number, e-mail address
Authentication data	Log-in and password and other such information used in connection with the proper authentication
Competences	Job application, CV, education background, examinations taken, skills profiles and other relevant qualification or certificate attached
Evaluation, tests and checks	Aptitude and personality tests, health checks and security clearances, where applicable
Preferences	Preferred country/countries and/or sites of employment, willingness to relocate, desired salary
References	References can be retrieved from previous employers. These contacts are provided by the applicant. In such case, the job applicant is responsible to obtain consent from the third party.
Technical data	Log data and IP address
Communications	Communication data during recruitment process, including emails, voice mails, video recordings
Other	Photograph when provided by the applicant or if applicant gives a consent to take a picture in connection to an interview and video interview recordings when applicable

As a rule, this personal data is collected directly from the job applicant. Subject to applicable national legislation, SSAB or its third-party service providers may also collect personal data from other sources.

SSAB does not generally collect information about job applicants that is particularly personal or private (sensitive information). If sensitive information will be collected and processed at some stage of the recruitment process, such collection is based on the applicable local legislation, and the job applicant will be informed thereof. SSAB is an equal opportunity employer and SSAB offers equal treatment to all job applicants.

## 3. Transfers or disclosure of personal data

In some cases, SSAB uses third-parties in the recruitment process and can outsource parts of the process, thus personal data may be disclosed:

- to trusted service providers, such as recruitment partners and system providers for competence and qualification reasons, including aptitude tests;
- to authorities or other parties, in order to conduct background checks. When required by applicable law, consent of the job applicant will be asked prior to the event.

Third parties may act on SSAB's behalf as data processors or as independent data controllers, depending on the case.

#### **4. Retention of personal data**

Personal data related to non-chosen job applicants shall be retained for up to two years. If the recruitment process leads to an employment with SSAB, relevant Personal data will be retained during and after the course of the employment as required by retention period provided in the applicable law. Generally, candidate pool information is retained for one year since last login.

#### **5. Automated decision making**

In certain instances, SSAB may recur to automated decision making in the initial stages of the recruitment process. As the job applicant, you have the right to not be subject to automated decision making.