

# 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.

# Marketing

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

SSAB processes the personal data of individuals for various marketing purposes. When an individual provides SSAB with contact details, for example, in connection with the sale of a product or service, contacts SSAB's customer service, orders a handbook or other materials on the website or participates in competitions or surveys, SSAB may use the individual's personal data for marketing purposes and to promote SSAB's latest products and services as well as to personalize the user experience.

PROCESSING ACTIVITY	LEGAL BASIS	DESCRIPTION
Marketing and communications	Legitimate interest   Consent	Individuals' personal data is used to manage communication with individuals and for marketing purposes. In this respect, the processing is done to provide them with relevant and up-to-date information as part of the website, as well as through other digital platforms and services. Processing is done also to promote SSAB's latest products and services as well as to personalize the individual's experience and to evaluate customer satisfaction.
eMarketing	Consent   Legitimate interest	SSAB may provide an individual with product and service updates, newsletters and other communications about existing or new products and services by email and text message (SMS), with the consent of the individual when required by applicable law. An individual may unsubscribe from marketing communications at any time by clicking on the "unsubscribe" link located at the bottom of emails.
Lead generation	Legitimate interest   Consent	SSAB generates leads in order to identify and cultivate potential customers. The data is used to initiate and maintain business relationships.
Targeted advertising	Consent	SSAB or SSAB's advertising partners may display content or advertisements to an individual, for example, they might see an advertisement for a recently viewed product on SSAB's website. SSAB uses cookies and other similar technologies to display personalized adverts based on, for example, the individual's browsing, purchase history or log-in information. Please see section Cookies, web users, digital channels for further information related to targeted advertising, as well as statistical and other purposes of using cookies and the legal basis thereof.

Pursuant to applicable laws, individuals are given the opportunity to give their prior consent or are allowed the opportunity to opt-out of receiving marketing communications from SSAB or other group companies.

**2. Collection of personal data**

SSAB collects personal data for marketing purposes. These types of personal data include:

<b>PERSONAL DATA</b>	<b>EXAMPLES</b>
Basic personal data	Name, phone number, email address
Company information	Company name, role, city, country, address
Contacting information	Reasons for contacting SSAB and details related to contact
Other	Surveys and competitions participated in

Additionally, SSAB might use customer information combined with website activity for marketing and customer segmentation purposes.

**3. Statistics and segregation**

SSAB may create user-group profiles or segment data for the purpose of creating aggregated statistics about the use of SSAB's websites, products and services, such as to estimate the number of users, viewed pages, email reads and detect which parts of the website users find the most useful, to identify features that could be improved and to provide context-based advertising to user groups. Data collected for these purposes is not used to identify a particular user but to analyze how users in general or user groups use the website or services.

**4. Retention of personal data**

The personal data will be retained only for as long as necessary to fulfill the purposes defined above. After that, personal data will be removed except when personal data retention is required by law or rights or obligations by either party.

The main rules for the marketing retention periods:

- Data collected in connection with customer service, other interaction with SSAB, surveys and competitions will be retained for as long as necessary to manage and handle the matter in question.
- SSAB will delete or anonymize data used for marketing purposes after a reasonable period of time has lapsed from last contact between the individual and SSAB.