

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. 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.

Other external stakeholders

1. Legal basis and purpose of processing personal data

SSAB may process personal data of other external stakeholders, such as persons approaching SSAB in order to give feedback or to report an incident related to SSAB’s operations, or who contact SSAB for other reasons. The purposes of processing personal data is explained below.

PROCESSING ACTIVITY	LEGAL BASIS	DESCRIPTION
Incident and grievance reporting	Legitimate interest	<p>Individuals’ personal data is used to manage communication with the individual and to follow up and take actions related to reported incidents.</p> <p>Individuals can choose to submit their feedback with their contact information, so that SSAB can respond to them and follow up and take actions related to the reported matter.</p> <p>The reports may at times also contain information related to other individuals than the person reporting the incident.</p>
Other feedback and contacts with SSAB	Legitimate interest	<p>SSAB may process personal data of individuals having provided feedback to SSAB .</p> <p>1.1 The feedback and communications to SSAB may at times also contain information related to other individuals than the person contacting SSAB.</p>

2. Collection of personal data

Depending on the individuals' interaction, SSAB may collect the following personal data:

PERSONAL DATA	EXAMPLES
Contact details	Name, email address, phone number, address,
Other personal data	Other personal data provided as part of the incident reporting, grievance or other feedback

Generally personal data is collected directly from individuals. However, SSAB may also receive other types of personal data from the reporter in the free text fields or attachments of feedback forms. Data provided by the reporter may include personal data of other individuals.

3. Retention of personal data

Personal data will only be stored for as long as is necessary for the purposes of processing and following up the reported incident or to process the feedback given by the individual, and to take

relevant measures in relation to the feedback or the reported matter. Personal data that is not relevant to the reported event or feedback will be deleted as soon as possible.

In some instances, personal data is used to establish, assert or defend a legal claim. In these circumstances, personal data will be stored until the legal proceedings and related actions are completed.