

# **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 <u>SSAB group companies</u> and affiliates can be found in the latest <u>Annual Report</u>. 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:

SSAB AB (Publ) Box 70, SE 101 21 Stockholm Sweden

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- 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.

## 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 ٠
- 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.

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### 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.

E: info@ssab.com www.ssab.com

## 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.

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# Cookies, web users and digital channels

Cookies are commonly used on many websites today. A cookie is a small file which is sent to and stored on a computer or a device when an individual is using SSAB's website.

# 1. Cookies

SSAB uses cookies and similar techniques to provide functionality of website, to enhance the user experience and to identify individuals and how they use the website, to analyze traffic on the website as well as to provide more relevant information to individuals. We also share information about the use of our site with our social media partners, advertising partners and analytics partners who may combine it with other information that individuals have provided to them or that they've collected from your use of their services.

Some of the cookies on SSAB websites collect personal data from users.

# 1.1 Controlling the use of cookies

SSAB asks for individuals' consent for using other than strictly necessary cookies. Individuals may allow the use of all cookies or prohibit the use of certain categories of cookies (other than strictly necessary cookies). However, cookies are an important part of how the website works, so limiting the use of cookies may affect the functionality and user experience of the website.

# 1.2 Different Types of Cookies used on SSAB Websites

SSAB uses both session and persistent cookies:

- Session cookies are stored in memory for the duration of the session and removed once the individual closes the browser. SSAB uses session cookies to display content on the website and remember user preferences.
- Persistent cookies are placed on hard drive of the individual's computer and stored until they expire or the individual deletes them. SSAB uses persistent cookies for retrieving information the individual has previously provided, to remember preferences, to customize the website for the individual and to optimize the user experience.

SSAB uses both first- and third-party cookies:

- First party cookies refer to both session and persistent cookies placed by SSAB on the website.
- Third party cookies are cookies placed by third parties on SSAB's website. SSAB uses third party cookies for statistical purposes to compile anonymous, aggregated statistics and, to help extend the website services and content with known and trusted partners, such as Google Analytics.

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

SSAB uses web user information and cookies for various purposes, which are explained below:

PROCESSING ACTIVITY	LEGAL BASIS	DESCRIPTION
Strictly necessary cookies (mandatory)	Legitimate interest	Strictly necessary cookies are essential in order
		to enable an individual to move around the
		website and use its features. Without these
		cookies, website or services cannot remember,
		for example, individual's login details. They
		cannot be switched off in SSAB systems.
Functionality cookies (optional)	Consent	Functionality cookies remember choices an
		individual makes, such as country and language
		preferences and to remember sessions in case
		of time-out. These cookies can be used to
		provide a better user experience.
Performance cookies (optional)	Consent	Performance cookies collect information on how
		individuals use the website. SSAB uses cookies
		to understand how individuals arrive at the
		website, browse or otherwise use the website,
		and identify features that could be improved,
		such as navigation and marketing campaigns.
		The data stored by these cookies do not show
		personal data of particular individual identity.
Targeted/Advertising cookies (optional)	Consent	Targeted/advertising cookies collect information
		about an individual's browsing habits and
		remember the visits in order to make advertising
		more relevant to that individual and their
		interests. The cookies are usually placed by
		third-party advertising networks.

To see more details about cookies, please consult SSAB's *Cookie settings*, Manage *Consent Preferences* and the *Cookie Details* of each type of cookie.

## 3. Collection of data

SSAB may collect personal data through different means, which are explained below.

#### 3.1 Individual's interaction with SSAB on website or otherwise

SSAB may collect personal data when an individual contacts SSAB's customer service, uses a website chat, deploys SSAB's digital service platforms, contacts SSAB otherwise, orders SSAB's newsletter or participates in surveys or competitions on websites or elsewhere. This personal data is collected directly from the individual.

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SSAB may collect personal data that the individual has shared with SSAB, such as

PERSONAL DATA	EXAMPLES
Basic information about the individual	Name, email address and phone number
Contacting information	Reasons for contacting SSAB and details related to
	contact
Other	Surveys and competitions participated in

#### 3.2 Automatically collected data of the use of website and services

SSAB collects and processes the following technical data about the individual and the use of the website, products and services provided by SSAB:

PERSONAL DATA	EXAMPLES
Identifiers	IP address, device ID, browser and device
	type, operating system used and application
	settings,
User activity	Pages viewed and items 'clicked' on,
	timestamps and log data relating to the use of
	the service, session details
Geography	Location/country of origin

#### 3.3 Data collected from other sources

SSAB may, from time to time, also collect information from publicly available sources and third parties, such as social networks and marketing companies. For example, SSAB may receive basic information about the individual's social network profile, if they login to SSAB's website or services using a social network account.

### 4. Retention times

The retention times of cookies used by SSAB vary. To see more details on retention times of all cookies, please consult SSAB's Cookie settings, Manage Consent Preferences and the Cookie Details of each type of cookies.

### 5. Links and third parties

SSAB's website may contain links to websites and services of third parties. These websites or services are subject to their own privacy notices. SSAB does not take any responsibility of third parties' privacy notices or the processing of personal data in third parties' operations. Please pay attention to their respective privacy notices and subsequent changes to them.

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SSAB is a Nordic and US-based steel company that builds a stronger, lighter and more sustainable world through value added steel products and services. Working with our partners, SSAB has developed SSAB Fossil-free<sup>™</sup> steel and plans to reinvent the value chain from the mine to the end customer, largely eliminating carbon dioxide emissions from our own operations. SSAB Zero<sup>™</sup>, a largely carbon emission-free steel based on recycled steel, further strengthens SSAB's leadership position and our comprehensive, sustainable offering independent of the raw material. SSAB has employees in over 50 countries and production facilities in Sweden, Finland and the US. SSAB is listed on Nasdaq Stockholm and has a secondary listing on Nasdaq Helsinki. Join us on our journey! www.ssab.com, Facebook, Instagram, LinkedIn, X and YouTube.

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