



## 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:

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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](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.

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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](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.

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# Externals, sub-contractors and suppliers

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

SSAB processes personal data of externals (such as consultants, independent contractors, freelancers and rental labor), sub-contractors and suppliers for various purposes, which are explained below.

PROCESSING ACTIVITY	LEGAL BASIS	DESCRIPTION
Work order and assignment management and complying with legal obligations	Contract   Legitimate interest   Legal obligation	SSAB processes personal data of externals and sub-contractors in order to manage ordered work and assignments.
Contractual and other interaction with suppliers	Contract   Legitimate interest   Legal obligation	SSAB processes personal data to source services and material for SSAB's business needs. This is to process data for fulfilling its contractual obligations and being able to communicate with its suppliers. Processing is needed prior to entering into a contractual relationship with the company or organization the individual is representing, or in some cases also with the individual directly.
Security clearance process	Legal obligation	In some cases, individuals working to SSAB's account might be subject to a security clearance in order to verify that there are no obstacles to conduct specific work.
Complying with obligations related to foreign and leased labor, subcontracted labor and prevention of using undeclared workforce	Legal obligation	SSAB adheres to legal and regulatory requirements such as those related to <ul style="list-style-type: none"> <li>• foreign workers</li> <li>• workers hired through a leasing or staffing agency</li> <li>• subcontracted labor; and</li> <li>• prevention of use of undeclared workforce.</li> </ul> SSAB also processes data to ensure that its contractual partners have fulfilled their respective legal obligations.
IT Tools and Systems	Legitimate interest	SSAB uses and provides multiple IT tools and systems in order for externals and sub-contractors to conduct their work, including daily and necessary tasks. Such tools include, but are not limited to, email, communication platforms, file storage, ticketing and Business unit specific solutions. These tools can be outsourced platforms, such as MS products and SaaS products. Personal data collected and

		used in these systems are only used for the legitimate business purposes.
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.
Product, services and company process development	Legitimate interest	SSAB aims to provide high-quality products, services and company processes also internally. For this reason, personal data may be used for product, services and process development.
Training and awareness	Legitimate interest   (Legal obligation)	SSAB conducts training and awareness for externals and sub-contractors on multiple topics. Some specific training topics may also be legally mandatory to be conducted, such as work safety and first aid.
Compliance with statutory obligations	Legal obligation	<p>Personal data processing may be needed in order to be in compliance, with i.a. the following statutory requirements:</p> <ul style="list-style-type: none"> <li>• supply-chain auditing</li> <li>• sanctions and other compliance screening</li> <li>• whistleblowing procedures</li> </ul> <p>In addition, certain personal data may be stored for dispute resolution purposes to be able to establish and defend legal claims.</p>

## 2. Collection of personal data

<b>PERSONAL DATA</b>	<b>EXAMPLES</b>
Contact details	Name, email address and phone number
Employer contact details	Company name, business address, country, business email address and business phone number
Billing information	In some instances, information related to billing, such as working hours, is collected
Information relating to the business relationship	Products and services sourced, the starting and end time of the business relationship, events attended, purchase history, preferences
Contractual relationship	Start and end date of contract, any other information processed during the contractual relationship

Professional information of an individual may also be collected prior of and depending on the type of the contractual relationship. In these cases, information such as CV, qualifications, certifications and work history may be processed.

If the individual receives an SSAB IT account, these types of data may also be processed:

<b>PERSONAL DATA</b>	<b>EXAMPLES</b>
Work-related contact information	Employee number and ID, work email, phone number and address, photograph
Work-related devices provided by SSAB	Phone, tablet, computer and serial and/or IMEI number of device and information about SIM cards and user name to SSAB systems
Travelling and travel expenses information	Data related to business travels
Technical data	Log data and IP address
Safety records	Work-related accidents, near-misses and possible disciplinary matters

In some cases, SSAB may need to collect data needed to comply with legal obligations related to foreign and leased labor, sub-contractor labor and prevention of using undeclared workforce. Depending on each country's legislation, the gathered information may include the following: Tax number, national ID, birth date, nationality, copy of the identity document, A1 certificate and corresponding certificates, information on the right to work and copies of the relevant documents, residence permits, data on salary and working hours, contact data of local representative.

In addition, in some exceptional cases, such as in case of occupational accidents, SSAB might process sensitive data. As a rule, this personal data is collected either directly from the individual, their employer or the contracting party. However, personal data related to an individual's performance and potential disciplinary matters may be collected from other sources, such as from the immediate superior, other employees and witnesses. Furthermore, some compliance-related data may be collected from third parties such as tax authorities or

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databases concerning fulfilment of legal obligations related to workforce (e.g. in Finland Vastuugroup.fi).

### **3. Retention of personal data**

The personal data related to the collaboration relationship will be retained only for as long as necessary to fulfill the purposes defined in above. Most of engagement related data will be retained during the course of the engagement or as required by retention period provided in the applicable law. Some of those laws demand that the data is kept longer, e.g. data relating to the work contract. When the personal data is no longer required by law or rights or obligations by either party, SSAB will remove externals', and sub-contractors' personal data. Personal data regarding suppliers will be retained during the business relationship and after that for as long as necessary or required by law or rights or obligations by either party, for example for billing purposes.

Exceptionally, SSAB may retain personal data for a longer period if SSAB has a legitimate reason or an obligation to store the recordings for the purposes of a dispute, criminal investigation or other corresponding reason.

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™ 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™, 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](http://www.ssab.com), [Facebook](#), [Instagram](#), [LinkedIn](#), [X](#) and [YouTube](#).

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