

# Data protection policy

Executive summary

March 2025

Key Points	Comment
Purpose and scope	The Policy aims to safeguard personal data and ensure compliance with data protection laws. It applies to all personal data processed by ArcelorMittal entities and their subsidiaries.
Definitions	Key terms such as «Controller,» «Processor,» «Binding corporate rules,» and «Data Subject» are defined to clarify roles and responsibilities.
Data collection and Processing	<p>The Policy details the types of personal data collected, including identity, contact, professional, financial, health and safety, communication, legal and compliance, location, transaction and payment, marketing and preference, employment-specific, and technical data.</p> <p>It outlines the legal bases for Processing personal data, such as consent, contractual obligations, legal obligations, vital interests, public interest, and legitimate interests.</p>
Data Protection at ArcelorMittal	<p>ArcelorMittal has developed a documented privacy management framework to ensure compliance with data protection laws and protect individuals' rights<sup>1</sup>.</p> <p>Objectives include meeting management requirements, supporting organizational goals, imposing controls, ensuring statutory compliance, and protecting stakeholders' interests<sup>1</sup></p>
Data sharing and retention	<p>Personal data may be shared with subsidiaries, service providers, business partners, legal authorities, and relevant third parties for legitimate purposes<sup>1</sup>.</p> <p>Data retention periods are specified, with personal data retained for the duration of the contract and thereafter for ten years, unless longer or shorter statutory periods apply.</p>
Data Subject Rights	<p>Individuals have rights such as access, rectification, erasure, restriction of processing, objection, data portability, and withdrawal of consent.</p> <p>The Policy provides contact information for exercising these rights and lodging complaints with the relevant data protection authority. For more information about your rights, please contact us to the following email : <a href="mailto:dataprotection@arcelormittal.com">dataprotection@arcelormittal.com</a> or use the form available on web page : <a href="#">Privacy Policy   ArcelorMittal</a></p>
Security and International Transfers	<p>Technical and organizational measures are in place to protect personal data from unauthorized access, use, alteration, and disclosure.</p> <p>The policy addresses international data transfers, ensuring appropriate safeguards are in place for transfers outside the EU/EEA.</p>
Policy Updates and Contact Information	<p>The Policy may be updated to reflect changes in practices and legal obligations, with the latest version available on the <a href="#">ArcelorMittal 's website</a></p> <p>Contact information in below is provided for any questions or concerns regarding the Policy.</p> <p>Group Data Protection Officer: Henk Scheffer <a href="mailto:dataprotection@arcelormittal.com">dataprotection@arcelormittal.com</a></p>

## 1. Purpose

ArcelorMittal Group<sup>1</sup> ("ArcelorMittal", "we", "our", or "us") respects your privacy and is committed to protecting your Personal Data. This Data Protection Policy (the "Policy") explains how we collect, use, disclose, and safeguard Personal Data of all Data Subjects when they interact with us, or use our services. Please take the time to read this Policy carefully to understand our views and practices regarding your Personal Data and how we will treat it.

## 2. Scope

This Policy applies to all Data Subjects of ArcelorMittal and to any third party acting on our behalf and to all Processing of Personal Data by us.

This Policy applies to:

- (i) any and all Personal Data processed by or on behalf of an ArcelorMittal entity or its subsidiaries, including (but not limited to) employees, customers, contractors, local stakeholders, job candidates, external consultants, business partners and suppliers; and
- (ii) any and all Personal Data processed by or on behalf of us, and further transferred or made available outside of the European Union ("EU")/ European Economic Area ("EEA"), including employees, customers, job candidates, contractors, local stakeholders, external consultants, business partners and suppliers.

The Controller of your Personal Data (as defined below) will be the ArcelorMittal entity with which you interact with. This Policy is in line with the European General Data Protection Regulation (GDPR) 2016/679 EU ("GDPR"), as well as any applicable national data protection provisions (collectively with the GDPR, the "Data Protection Laws"), and is based on ArcelorMittal's Binding corporate rules.

## 3. Definitions

"Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or EU member state law, the controller or the specific criteria for its nomination may be provided for by Union or EU member state law;

"Processor" means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller;

"Binding corporate rules" are Personal Data protection policies which are adhered to by a Controller or processor established in the territory of a Member State for transfers or a set of transfers of Personal Data to a Controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity.



"Data Subject" means any natural person whose Personal Data are processed in the context of a process falling in the scope of this Policy.

"Consent" means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data.

"Personal Data" means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

"Processing" of Personal Data means any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

"Special Categories of Personal Data" or "Special Data" means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic and biometric data for the purpose of uniquely identifying a natural person and data concerning health or sex life and sexual orientation.

"Subsidiary(ies)" means any company or legal entity fully consolidated and controlled by an ArcelorMittal entity. The term "control" means the possession, direct or indirect, through one or more intermediaries of the power to direct or cause the direction of the management and policies of a company or legal entity, whether through the ownership of voting securities, by contract or otherwise.

<sup>1</sup> This present data privacy policy is applicable to all ArcelorMittal subsidiaries but might be completed by further requirements as per the local privacy law(s) as applicable. For more information, please visit the website of the concerned subsidiary(ies) or write us at: [dataprotection@arcelormittal.com](mailto:dataprotection@arcelormittal.com). You can also use the electronic form available in our corporate website. <https://corporate.arcelormittal.com/>

## 5. Business benefits

The Processing of Personal Data is regulated in many of the countries where we are present and do business.

We recognize that Personal Data must be treated with caution, therefore we adopt practical and legal measures to protect Personal Data handled under our responsibility.

## 6. Data Protection at ArcelorMittal

The Board of Directors and management of ArcelorMittal are committed to comply with all relevant Data Protection Laws, and to protecting the rights and freedoms of individuals whose Personal Data ArcelorMittal processes. To that end, ArcelorMittal has developed and implemented a documented Privacy management framework for ArcelorMittal which will be maintained, continuously improved and supported with further specific privacy and data protection policies and procedures.

Our objectives are to ensure adequate Personal Data protection and fair Processing to:

- (i) meet our own requirements for the management of Personal Data;
- (ii) support organizational objectives and obligations;
- (iii) impose controls in line with our acceptable level of risk;
- (iv) ensure that we meet applicable statutory, regulatory, contractual and/or professional duties; and
- (v) protect the interests of individuals and other stakeholders.

## 7. What Personal Data do we collect?

We collect the following categories of Personal Data when you interact with us:

### a) Identity data

- Full name (first name, last name)
- Username (for website or platform access)
- Gender
- Place and date of birth or age
- Nationality
- Photographs or video recordings (e.g., ID cards, employee badges)
- Signature (for contracts, agreements, or documents)

### b) Contact data

- Home address
- Email address (personal, work, or general)
- Phone number (mobile, home, work)
- Social media profiles (if shared with us)
- Emergency contact details

### c) Professional data

- Job title or position
- Employment history (current and past roles, employers, dates)
- Educational qualifications (degrees, diplomas, certifications)
- Professional certifications or licenses
- Skills (languages, technical skills, etc.)
- CV or resume (submitted during recruitment)
- Job application documents (cover letters, portfolios, etc.)
- References (professional or personal)
- Job performance (appraisals, performance reviews, etc.)
- Career development data (training, promotion history)

### d) Financial data

- Bank account details (for salary or payments)
- Payment card details (when necessary for transactions)
- Salary or wage data
- Tax-related information (e.g., tax identification number, withholding tax)
- Benefits and bonus information
- Invoices and billing records

### e) Health and safety data to the extent permitted by applicable laws and regulations (If applicable – Note: Special categories of Personal Data are subject to stricter processing rules under the GDPR)

- Medical history (relevant to employment, health-related accommodations, etc.)
- Sick leave records
- Disability status (if relevant for workplace accommodations)
- Workplace health assessments (e.g., occupational health tests)
- Absence records (sick days, medical appointments)
- Vaccination records (in certain contexts like healthcare or travel requirements)

### f) Communication data

- Emails (including communications sent to or received from/by us or/and third party)
- Customer service interactions (E.g.: messages, support tickets, chat logs,)
- Social media interactions (E.g.: direct messages, comments, feedback)
- Marketing communication preferences (E.g.: opt-in/opt-out data)

### g) Legal and Compliance data

- Criminal records (for positions requiring background checks)
- Right to work documentation (visa, work permit, citizenship status)
- Disciplinary records (if applicable, for employees or contractors)
- Non-disclosure agreements (NDAs, contracts)
- Health and safety records (compliance with legal regulations)



#### **h) Location data**

- Home address (for customers or employees for service delivery or payroll purposes)
- Work location (office, field, or remote work for employees or contractors)
- IP addresses (when using online services, websites, or apps)

#### **i) Transaction and Payment data**

- Purchase history (for customers)
- Billing and shipping addresses
- Payment method details (credit card, bank transfer, PayPal, etc.)
- Transaction records (for online or in-store purchases)
- Subscription data (for recurring services or products)

#### **j) Marketing and preference data**

- Marketing preferences (e.g., newsletter subscriptions, frequency of communication)
- Survey responses (feedback, customer satisfaction surveys)
- Advertising Consent (opt-ins for promotional materials)
- Social media interactions (likes, shares, comments)
- Customer loyalty or reward program data
- Content or ad targeting preferences

#### **k) Employment-specific data (If applicable)**

- Employee ID
- Marital status and immigration status
- Payroll information (including tax deductions, social security contributions)
- Work schedule (shift patterns, hours worked)
- Leave records (vacation, parental, sick leave, etc.)
- Employee assistance program data (if offered by employer)
- Union membership details (if applicable)
- Disciplinary and grievance matters

#### **l) Data from candidates**

- Job applications (cover letters, application forms)
- Curriculum Vitae (CV)
- Interview notes or assessments
- Test results (e.g., skills tests, psychometric tests, etc.)
- Reference checks
- Background checks (e.g., criminal history, credit checks)
- Salary expectations
- Hiring decisions (feedback, offer details)

#### **m) Technical data**

- IP address (for website visitors or online services)
- Device information (browser type, operating system, device ID)
- Log data (access logs, errors)
- Cookies (for website analytics and user tracking)
- Analytics data (site usage patterns, visitor behavior, interactions)

#### **n) Special Categories of data (If applicable)**

(Note: Special Categories of Personal Data are subject to stricter processing rules under the GDPR)

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or biometric data
- Health data (e.g., medical conditions, health insurance information)
- Sexual orientation or gender identity
- Criminal convictions and offences

#### **o) Subcontractor-related data**

- Contractual details (agreements, contracts, terms)
- Service performance data (reports, deliverables)
- Payment and invoicing information
- Contact details (name, phone, email)
- Tax-related details (for invoicing and payment)
- Compliance records (such as proof of insurance or certifications)

Data Subjects may, at their discretion, refuse to communicate Personal Data to us. In this event however, we may be prevented from providing relevant Data Subjects with the requested service/employment if the relevant Personal Data are necessary for such purpose.

In addition, the Data Subjects should refrain from supplying additional Personal Data which are not requested by ArcelorMittal or any other entity acting on ArcelorMittal's behalf. Unless provided otherwise by applicable law, we shall not be liable for any damage caused by the Processing of such Personal Data provided by the Data Subjects without being requested by us.

Data Subjects supplying Personal Data relating to any other natural persons other than themselves (such as emergency contacts or relatives, as the case may be) undertake and guarantee to process Personal Data and to supply such Personal Data to us in compliance with the Data Protection Laws, including, where appropriate, informing the relevant Data Subjects of the content of this Policy and any updated version thereof.



## 8. Legal basis or grounds for Processing of Personal Data

We rely on the following lawful bases for Processing any Data Subject's Personal Data:

- ✓ the Data Subject has given Consent to the Processing of their Personal Data for one or more specific purposes;
- ✓ Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract;
- ✓ Processing is necessary for compliance with a legal obligation to which we, as Controller are subject;
- ✓ Processing is necessary in order to protect the vital interests of the Data Subject or of another natural person;
- ✓ Processing is necessary for the performance of a task carried out in the public interest [or in the exercise of official authority vested in the Controller];
- ✓ Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of Personal Data, in particular where the Data Subject is a child

technologies when you visit our website or use our services. This may include your browsing history, IP address, device information, and interactions with our site (e.g., pages viewed, duration of visit, and clicks).

- **Analytics Tools:** We use tools like to track website usage and improve your user experience. These tools collect information such as the pages you visit, how long you stay on them, and your interactions on our site.
- **Location Data:** If you enable location services on your device, we may collect information about your physical location when using our services or applications.

### c) From Third-Party sources

- **Publicly available sources:** We may collect information about you from publicly available sources, such as social media profiles (e.g., LinkedIn, Facebook), company websites, or public databases, as permitted by law.
- **Partnered organizations:** We may receive Personal Data from third parties, such as recruitment agencies, contractors, business partners, or service providers, who help us process transactions or manage your requests.
- **Credit and background check services:** For certain activities (e.g., employment or financial services), we may obtain data from third-party credit bureaus, background check services, or other verification sources to assess your eligibility or suitability.
- **Marketing and advertising partners:** If you interact with an advertisement (e.g., clicking on an ad or completing an online survey), we may collect data from marketing or advertising partners to understand your interests and improve our promotional activities.

### d) Through social media and other platforms

- **Social media accounts:** If you engage with us via social media, we may collect information such as your profile details, posts, or interactions with our content.
- **Social Logins:** If you choose to sign up or log in using your social media account, we may collect the information you have made available through these services, such as your name, email address, or profile photo.

### e) Indirectly from other users

- **Referral Data:** If someone shares your contact information with us (e.g., via a referral for employment, a product review, or customer service), we may collect Personal Data related to your referral or interactions with them.
- **Collaborators or service providers:** If you work with us or provide services through a partner or contractor, we may collect Personal Data from your employer, business partners, or other third parties who interact with us on your behalf.

### f) When you communicate with us

- **Email, Phone, or Live Chat:** We collect data when you communicate with us via email, phone calls, or live chat. This may include the content of your communication, your contact details, and the records of our interactions.
- **Customer Service Requests:** If you contact our customer support team, we may collect your Personal Data to assist with your request, including order history, product details, or service issues.

## 9. How we collect your Personal Data

We collect your Personal Data in a variety of ways, including but not limited to the following methods:

### a) Directly from you

- **When you register** on our website or app (e.g., creating an account, logging in).
- **When you fill out forms** on our website or when interacting with us via email, phone, or in-person (e.g., contact forms, survey responses, subscription forms).
- **When you apply for a job** with us, either through our recruitment platform, online, via email, or in-person applications.
- **When you make a purchase** or engage in a transaction with us (e.g., online or in-store purchases, orders, or subscriptions).
- **When you sign a contract** or agreement with us (e.g., employment contracts, service contracts, or partnership agreements).
- **When you provide feedback** or participate in surveys, customer satisfaction polls, or reviews.

### b) Automatically through your interaction with our services

- **Cookies and tracking technologies:** We collect data automatically via cookies or similar tracking

#### g) During events or interactions in physical locations

- **In-person:** We may collect your data during face-to-face interactions, such as at company events, conferences, or customer meetings.
- **Business Cards:** We may collect your contact details when you share your business card with us during networking or business meetings.

#### h) Through payment and transactional data

- **When you make a purchase or payment:** We collect your payment details (e.g., credit card information, billing address) when you make a purchase through our website, app, or in-store.
- **Subscription or service orders:** If you subscribe to our services, we may collect data such as your billing information, service preferences, and renewal dates.



## 10. Why do we collect your Personal data?

We collect and process your Personal Data for a variety of legitimate business purposes and legal bases.

#### a) To provide and manage our services

- **Fulfill contractual obligations:** To process your orders, deliver products or services, and manage service agreements.
  - Lawful basis relied upon: Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.
  - Categories of Personal Data processed: Identity data, Contact data, financial data, Communication data, Legal and Compliance data, Location data, Transaction and Payment data.
- **Customer support:** To provide assistance and resolve issues related to your use of our products or services.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.

- Categories of Personal Data processed: Identity data, Contact data, Financial data, Communication data, Location data, Transaction and Payment data.

- **Account management:** To create, maintain, and manage your account and profile for easy access to our services.

- Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.

- Categories of Personal Data processed: Identity data, Contact data, Financial data, Communication data, Location data, Transaction and Payment data, Marketing and preference data, Technical data.

- **Processing payments:** To process payments, handle transactions, and manage billing information (for customers, clients, or partners).

- Lawful basis relied upon: Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.

- Categories of Personal Data processed: Identity data, Contact data, Financial data, Transaction and Payment data, Subcontractor-related data.

#### b) For communication and customer engagement

- **Respond to inquiries and requests:** To communicate with you regarding questions, customer service inquiries, or technical support.

- Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.

- Categories of Personal Data processed: Identity data, Contact data, Communication data.

- **Provide updates and notifications:** To send you updates about our products, services, or any changes to terms, conditions, or policies.

- Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.

- Categories of Personal Data processed: Identity data and Contact data.

- **Send marketing and promotional materials:** With your Consent, we may send you marketing communications, including newsletters, special offers, and event invitations.

- Lawful basis relied upon: the Data Subject has given Consent to the Processing of their Personal Data for this specific purpose.

- Categories of Personal Data processed: Identity data, Contact data, Communication data, Marketing and preference data.

- **Market research and feedback:** To gather feedback, conduct surveys, or analyze customer satisfaction to improve our products, services, and user experience.

- Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party or the Data Subject has given Consent to the Processing of their Personal Data for one or more specific purposes.

- Categories of Personal Data processed: Identity data, Contact data, Communication data, Transaction and Payment data, Marketing and preference data.



### c) To improve and personalize your experience

- **Customization and personalization:** To tailor our products, services, and content to your preferences, ensuring a more personalized user experience.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Communication data, Financial data, Location data, Marketing and preference data.
- **Website and service optimization:** To analyze user behavior and improve the functionality of our website or services (using tools like Google Analytics, cookies, etc.).
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Marketing and preference data, Technical data.
- **Targeted advertising:** To provide you with advertisements and offers based on your interests and preferences (with your Consent, where required).
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party or the Data Subject has given Consent to the Processing of their Personal Data for one or more specific purposes.
  - Categories of Personal Data processed: Identity data, Contact data, Marketing and preference data, Communication data, Technical data.

### d) To fulfill legal, regulatory, and compliance requirements

- **Legal obligations:** To comply with relevant laws, regulations, and legal requirements (e.g., tax laws, employment laws, health and safety regulations, etc.).
  - Lawful basis relied upon: Processing is necessary for compliance with a legal obligation to which we, as Controller are subject.
  - Categories of Personal Data processed: Identity data, Contact data, Professional data, Financial data, Health and safety data, Legal and Compliance data, Location data, Transaction and Payment data, Employment-specific data, Data from candidates, Special Categories of Data, Subcontractor-related data.
- **Record-keeping and auditing:** To maintain accurate records for compliance purposes (e.g., financial transactions, employment records, or business correspondence).
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Professional data, Financial data, Health and safety data, Communication data, Legal and Compliance data, Location data, Transaction and Payment data, Employment-specific data, Data from candidates, Special Categories of Data, Subcontractor-related data.
- **Prevent fraud and security incidents:** To detect, prevent, and investigate fraudulent activities or security breaches.
  - Lawful basis relied upon: Processing is necessary for

the purposes of the legitimate interests pursued by the Controller or by a third party.

- **Categories of Personal Data processed:** Identity data, Contact data, Professional data, Financial data, Health and safety data, Legal and Compliance data, Location data, Transaction and Payment data, Employment-specific data, Data from candidates, Special Categories of Data, Subcontractor-related data.
- **Tax and accounting purposes:** To comply with tax regulations, process invoices, and maintain accurate financial records.
  - Lawful basis relied upon: Processing is necessary for compliance with a legal obligation to which we, as Controller are subject.
  - Categories of Personal Data processed: Identity data, Contact data, Professional data, Financial data, Health and safety data, Legal and Compliance data, Transaction and Payment data, Employment-specific data, Subcontractor-related data.

### e) For human resources and employment management

- **Recruitment and hiring:** To process job applications, conduct interviews, and assess candidates' qualifications for potential employment.
  - Lawful basis relied upon: Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.
  - Categories of Personal Data processed: Identity data, Contact data, Professional data, Health and safety data, Communication data, Legal and Compliance data, Data from candidates.
- **Employee management:** To manage employment contracts, payroll, benefits, and employee development (e.g., performance reviews, training records).
  - Lawful basis relied upon: Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.
  - Categories of Personal Data processed: Identity data, Contact data, Professional data, Financial data, Health and safety data, Legal and Compliance data, Employment-specific data.
- **Workplace health and safety:** To comply with health and safety regulations and provide necessary accommodations (e.g., for disabilities or medical conditions).
  - Lawful basis relied upon: Processing is necessary for compliance with a legal obligation to which we, as Controller are subject.
  - Categories of Personal Data processed: Identity data, Contact data, Professional data, Health and safety data, Legal and Compliance data, Special Categories of data.
- **Employee communications:** To manage internal communications, announcements, and organizational changes.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Contact data, Communication data, Employment-specific data, Technical data.

#### f) To enhance business operations and analytics

- **Business development and strategic decisions:** To analyze market trends, conduct business intelligence, and assess business performance.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Transaction and Payment data, Subcontractor-related data.
- **Operational efficiency:** To improve our internal processes and operations (e.g., streamlining supply chain, customer service, or product delivery).
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Communication data, Location data, Transaction and Payment data, Subcontractor related data.
- **Performance measurement:** To monitor and evaluate the effectiveness of our products, services, and marketing efforts.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Marketing and preference data, Technical data.

#### g) For security and risk management

- **Protecting Personal Data:** To ensure the confidentiality, integrity, and availability of your Personal Data and prevent unauthorized access, loss, or misuse.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Financial data, Communication data, Location data, Transaction and Payment data, Technical data.
- **Security monitoring:** To monitor the security of our network, website, and services to prevent cyberattacks, breaches, or other security incidents.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Financial data, Communication data, Location data, Transaction and Payment data, Technical data.
- **Authentication and access control:** To verify your identity when accessing sensitive areas of our website or services.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Technical data.

#### h) To provide employment-related services

- **Payroll and benefits management:** To process employee compensation, deductions, bonuses, and provide benefits like health insurance, pension plans, etc.

- Lawful basis relied upon: Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.
- Categories of Personal Data processed: Identity data, Contact data, Professional data, Financial data, Health and safety data, Legal and Compliance data, Employment-specific data.
- **Performance management:** To assess and improve employee performance through reviews, feedback, and goal-setting.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Professional data, Employment-specific data.
- **Employee relations:** To manage relationships with employees, including resolving disputes or grievances, conducting disciplinary actions, and promoting a positive workplace culture.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Professional data, Financial data, Health and safety data, Communication data, Legal and Compliance data, Employment-specific data.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: all types of Personal Data.
- **Business continuity:** ArcelorMittal may also, in exceptional cases and to safeguard its legitimate interests, access the professional e-mail box/files and, where applicable, the instant messaging system made available to the Data Subject for his/her work, where, for instance, the Data Subject is on an extended leave. Any such review will always be carried out in strict compliance with the Data Protection Laws and the Controller's internal IT policy.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: all types of Personal Data.

#### i) To support customer loyalty and rewards programs

- **Loyalty programs:** To administer loyalty or rewards programs (e.g., points accumulation, special discounts, or exclusive offers).
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Financial data, Communication data, Transaction and Payment data, Marketing and preference data.
- **Customer retention:** To encourage repeat business by offering personalized rewards and incentives based on your purchase history or engagement.



- Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
- Categories of Personal Data processed: Identity data, Contact data, Communication data, Transaction and Payment data, Financial data, Marketing and preference data

#### j) To Conduct Market Research and Innovation

- **Customer insights:** To understand customer needs, preferences, and behaviors for developing new products, services, or features.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Communication data, Transaction and Payment data, Marketing and preference data.
- **Innovation and development:** To test new concepts, prototypes, or services through feedback, product trials, or beta testing programs.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Communication data, Transaction and Payment data, Marketing and preference data, Subcontractor-related data.

#### k) To maintain legal and contractual rights

- **Enforce contracts:** To exercise or defend against legal claims related to agreements, disputes, or enforcement of rights.
- **Lawful basis relied upon:** Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Financial data, Communication data, Legal and Compliance data, Transaction and Payment data, Subcontractor-related data.
- **Resolve legal disputes:** To engage in legal proceedings, arbitration, or dispute resolution related to contractual or regulatory matters.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Identity data, Contact data, Financial data, Communication data, Legal and Compliance data, Transaction and Payment data, Subcontractor-related data.
- **Protect intellectual property:** To protect our intellectual property, trademarks, copyrights, and other proprietary rights.
  - Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
  - Categories of Personal Data processed: Legal and Compliance data, Subcontractor-related data.
- **Third party due diligences:** Allow any third party to carry out a due diligence, where such third party (i) acquires, or is interested in acquiring or securitizing, all or part of the Controller's assets or shares; (ii) succeeds to the Controller in carrying on all or a part of its businesses, or

services provided to it, whether by merger, acquisition, financing, reorganization or otherwise; or (iii) intends to onboard the Controller as a client or a co-investor or otherwise.

- Lawful basis relied upon: Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
- Categories of Personal Data processed: Identity data, Contact data, Professional data, Financial data, Communication data, Legal and Compliance data, Transaction and Payment data, Employment-specific data, Subcontractor-related data.

## 11. Who we share your data with?

We may share your Personal Data with the following types of recipients (the "**Recipients**"):

**Our Subsidiaries:** Sharing Personal Data with subsidiaries within ArcelorMittal may be necessary for legitimate purposes such as for the performance of a contract with the Data Subject (e.g., customers, employees, or service users) for our legitimate interest, to comply with legal obligations, to perform internal administrative functions such as human resources management, payroll, or financial processing, to ensure consistent data management and improve the security of Personal Data across the group. In addition, Subsidiaries in different countries within a group often share certain services and resources, such as IT infrastructure, customer support, marketing, and finance functions. For your information, at ArcelorMittal, we have Binding corporate rules applicable to us and our Subsidiaries.

**Service providers:** Companies who provide services on our behalf, such as payment processors, website hosting, IT support, legal counsels, auditors, and analytics providers.

**Business partners:** For example, partners for joint marketing initiatives, or where you've opted into third-party offers.

**Legal authorities:** Where we are required by law, regulation, or legal process to disclose information, we may share your data with governmental, judicial, prosecution or regulatory bodies.

**Relevant third parties:** Any third party that acquires, or is interested in acquiring or securitizing, all or part of the Controller's assets or shares, or that succeeds to it in carrying on all or a part of its businesses, or services provided to it, whether by merger, acquisition, financing, reorganization or otherwise.

These sharing are always done in a lawful, transparent, and accountable manner.

The Recipients may, under their own responsibility, disclose the Personal Data to their agents and/or delegates (the “Sub-Recipients”), which shall process the Personal Data for the sole purposes of assisting the Recipients in providing their services to us and/or assisting the Recipients in fulfilling their own legal obligations.

## 12. How long we keep your Personal Data

We retain your Personal Data for the duration of the contract with the relevant ArcelorMittal entity and thereafter for a period of ten (10) years, unless longer or shorter statutory limitation periods apply. In any case, where no contract exists, we will retain your Personal Data as long as necessary to fulfill the purposes outlined in this Policy, and in accordance with our data retention policy. When your Personal Data is no longer needed, we will securely delete or anonymize it.

## 13. Your data protection rights

Under the conditions and limitations foreseen by the GDPR, you have the following rights with respect to your Personal Data:

**Right of access:** You have the right to obtain confirmation as to whether your Personal Data are processed by ArcelorMittal or not and to access such data, as well as request a copy of the Personal Data we hold about you.

**Right to rectification:** You can request that we correct any inaccurate or incomplete Personal Data.

**Right to erasure:** You have the right to request that we delete your Personal Data, subject to certain conditions.

**Right to restriction of Processing:** You can request that we restrict the Processing of your Personal Data in certain circumstances.

**Right to object:** You can object to the Processing of your Personal Data based on the performance of a task carried out in the public interest or our legitimate interests or for direct marketing purposes.

**Right to data portability:** You have the right to request that we transfer your Personal Data to another organization, or directly to you, in a structured, commonly used, and machine-readable format.

**Right to withdraw your consent:** You have the right to withdraw your consent easily and at any time. The withdrawal of consent shall not however affect the lawfulness of Processing based on consent before its withdrawal.



To exercise any of these rights, please contact us at [dataprotection@arcelormittal.com](mailto:dataprotection@arcelormittal.com) or go to the **following webpage [Privacy Policy | ArcelorMittal](#)** where a request form is made available to everyone.

You also have the right to lodge a complaint with the Commission Nationale pour la Protection des Données (the “CNPD”) at the following address: 15, Boulevard du Jazz, L-4370 Belvaux, Grand Duchy of Luxembourg; or with any competent data protection supervisory authority of your state of residence.

## 14. Security of Personal Data

We take appropriate technical and organizational measures to protect your Personal Data from unauthorized access, use, alteration, and disclosure. These measures include encryption, secure servers, and access controls.

## 15. International transfers

If we transfer your Personal Data to Recipients located in countries outside the EU/EEA which do not offer an adequate level for the protection of Personal Data, we ensure that appropriate safeguards are in place, such as Binding corporate rules or the use of Standard Contractual Clauses approved by the European Commission, as well as, if necessary, supplementary measures to protect your data. Where the Recipients are located in a country outside the EEA which benefits from an adequacy decision of the European Commission, the Personal Data will be transferred to the Recipients upon such adequacy decision.

In this respect, the Data Subjects have a right to request copies of the relevant document for enabling the Personal Data transfer(s) towards such countries by writing to the Controller at the address referred to in the Section 16 below (“Contact Us”).

## 16. Changes to this Policy

We may update this Policy from time to time to reflect changes in our practices and/or legal obligations. An up-to-date version will be made available on our **website** at.

In case of substantial updates to the present Privacy Notice, you will be notified through our website at <https://corporate.arcelormittal.com> and/or the employee’s intranet] or other means of communication.



## 17. Contact us

If you have any questions or concerns about this Policy, or if you wish to exercise your data protection rights, please contact us at [dataprotection@arcelormittal.com](mailto:dataprotection@arcelormittal.com).

**ArcelorMittal S.A.**

24-26 boulevard d'Avranches, L-1160 Luxembourg,  
Luxembourg

Opening hours: 8a.m.-5p.m.

Phone: +352 47 921

*For more information about your rights under the GDPR, you may also contact the supervisory authority in your state of residence.*