

PRIVACY STATEMENT

ABOUT US

ArcelorMittal South Africa Limited, registration number: 1989/002164/06 is one of the largest steel producers in Africa and is listed on the Johannesburg Stock Exchange (**JSE**) and has two main steel production facilities in Vanderbijlpark and Newcastle as well as a metallurgical by-products division split into two coke making and by-products operations at the steel production facilities.

In this statement (**Privacy Statement**) any reference to “**ArcelorMittal**”, “**we**”, “**us**” or “**our**” includes all legal entities within the [ArcelorMittal South Africa Group structure](#), as updated from time to time, and “**data subject**” “**you**” or “**your**” refers to customers, suppliers, and/or any person or third party, interacting with, a legal entity within the ArcelorMittal South Africa Group.

We are a member of the ArcelorMittal Group of companies, consisting of our ultimate holding company, ArcelorMittal Société Anonyme, incorporated under Luxembourg law and has its registered office at 24-26, Boulevard d’Avranches, L-1160, Luxembourg, Grand Duchy of Luxembourg and is registered the R.C.S. Luxembourg under the company registration number B 82.454 and all its subsidiaries with a combined presence in 15 countries and customers in 129 countries.

THE PURPOSE

The purpose of this Privacy Statement is to inform you about how we collect, use, store, make available, disclose, update, destroy, safeguard or otherwise deal with your personal information and also to explain your rights relating to the privacy of your personal information and how the law protects you, the choices you have regarding its use and disclosure, and how you may access or correct the personal information which we have on record about you.

The ArcelorMittal and its operating subsidiaries are responsible parties as contemplated in the Protection of Personal Information, 4 of 2013 (“**POPIA**”), as we are responsible alone or in conjunction with others, for determining the purpose of, and means for, processing personal information.

As a responsible party, protecting your privacy and personal information is important to us. In this regard, ArcelorMittal has adopted data protection policies and procedures which provide a simplified legal basis for processing personal information, ensuring the confidentiality, transparency, protection, and security in the processing of personal information as well as enabling the exercise of data subject access rights.

SCOPE AND APPLICATION

This Privacy Statement forms part of a broader data protection compliance framework with other

policies and procedures developed by ArcelorMittal Group for the benefit of group companies (**Group Policies**) and which may be adopted and implemented by ArcelorMittal South Africa and its subsidiaries.

It should be noted that the Group Policies are mainly based on legislation and directives adopted by the European Union, such as the General Data Protection Regulation (**GDPR**) and will accordingly apply with the necessary changes where there is no similar local policy or to the extent the provisions of the Group Policy provide a higher standard of compliance than the local policy and are not in conflict with applicable law.

This Privacy Statement applies to:

- any and all personal of living, natural persons, and where it is applicable, identifiable, existing juristic persons, processed by or on behalf of all legal entities within the [ArcelorMittal South Africa Group structure](#), including but not limited to, employees, customers, contractors, local stakeholders, external consultants, business partners and suppliers;
- all legal entities within the [ArcelorMittal South Africa Group structure](#) and employees, including permanent, fixed-term, and temporary employees, directors, interns, third-party representatives, agents, sponsors and representatives who are carrying out work for or on our behalf;
- all operators, service providers, contractors and agents acting for or on our behalf; and
- any website, application, form, document, product or service which references this Privacy Statement. It also supplements any other privacy policies or procedures which may apply in respect of ArcelorMittal South Africa entities for the processing of personal information.

This Privacy Statement must be read with the following policies and procedures applicable to ArcelorMittal South Africa Group:

- Data Protection Policy (Group)
- Data Protection Procedure (Binding Corporate Rules) (Group)
- Employee Privacy Policy (Local)
- PAIA Manual (Local)

DESCRIPTION OF PERSONAL INFORMATION

Personal information, for the purposes of this Privacy Statement, is any information that is identifiable with or specifically relates to any and all personal of living, natural persons, and, where it is

applicable, identifiable, existing juristic persons as further defined in POPIA. This information may include but is not limited to the (a) race, gender, sex, marital status, national, ethnic or social origin, colour, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the data subject; (b) education or the medical, financial, criminal or employment history of the person; (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the data subject; or (d) the biometric information of the data subject.

COLLECTION OF PERSONAL INFORMATION

We will always collect your personal information by fair, lawful and reasonable means, ensuring that we protect your privacy. We will ensure that we only collect and use your personal information based on legitimate grounds and that your personal information is handled and processed in a way that you would reasonably expect and which does not adversely affect you.

We may collect personal information directly from you or by telephone or through online channels such as our website and electronic messaging platforms or from third parties, where we have obtained your consent to do so or as otherwise permitted by law such as where it is contained in a public record or has been made public by you or where collecting your personal information from a third party would not prejudice any of your legitimate interests.

When you engage with us through our social media accounts, your personal information may be processed by the social media platform owner. This process is outside our control, and the processing activities may be in a country outside of your home country that may have different data protection laws. For more information about the privacy practices of a social media platform, please refer to and read the terms and conditions of that social media platform before you use it or share any personal information on it.

Please refer to the Data Protection Policy for a full list of circumstances under which we may collect your personal information.

WHEN AND HOW CONSENT IS OBTAINED

We obtain your consent prior to collecting or using, or disclosing your personal information for any purpose, unless we are otherwise permitted to do so without your consent, including to carry out actions in relation to the conclusion or performance of a contract to which you are a party (such as a purchasing or supply agreement). You may provide your consent to us either electronically or in writing.

If we choose to process personal information based on consent, we will ensure that such consent is:

- unambiguous;

- freely given;
- specific; and
- informed

In this regard, we will inform and make clear to you from the outset the manner and reason for which your personal information will be processed before we obtain your consent to process it. You may withdraw your consent or object to our processing of your personal information at any time by contacting us using the [contact details](#) provided in this Privacy Statement, provided that we do not have any other legal ground for processing such personal information. The withdrawal of consent will not affect the legality of processing which occurred before your withdrawal of consent.

GUIDELINES FOR PROCESSING PERSONAL INFORMATION

We will ensure that your personal information is:

- processed fairly, lawfully and in a transparent manner;
- collected for a specified, legitimate purpose and not processed further in ways incompatible with that purpose;
- adequate, relevant and limited to what is necessary in relation to the purposes for which the information is collected and used;
- accurate, and where necessary, kept up-to-date. Every reasonable step will be taken to rectify or delete, without delay, the personal information that is inaccurate or incomplete;
- kept only as long as it is necessary for the purposes for which it was collected and processed, taking the legal obligations to preserve records into consideration;
- processed in a manner that ensures appropriate security and confidentiality, and we provide additional safeguards for special personal information;
- accessed only by persons whose function requires the handling of such personal information, on a need-to-know basis.

HOW WE PROCESS PERSONAL INFORMATION

We process personal information for lawful purposes relating to our business if the following circumstances apply:

- it is necessary to conclude or perform under a contract with the data subject or in order to take steps at the request of the data subject prior to entering into a contract;

- the processing is necessary for compliance with a legal obligation to which we are subject;
- it is required to protect or pursue the data subject's, the group's or a third party's legitimate interest;
- the data subject has consented thereto;
- a person legally authorised by the data subject, the law or a court, has consented thereto; or
- where the data subject is a child and a competent person (such as a parent or guardian) has consented thereto on their behalf.

We identify the purposes for which we use your personal information at the time we collect such information from you.

We will only collect your personal information for a specific, lawful and clear purpose, which we will inform you of as far as possible prior to when such processing occurs. We will ensure that your consent to such processing will relate only to the purpose for which you have been made aware, and we will not process your personal information for any other purpose.

We generally use your personal information for the following purposes:

- of identifying you;
- to process your request or instructions;
- for the purpose of providing services or products you request or obtaining services or products from you;
- to respond to an e-mail that you have sent to us by return e-mail, or if e-mail is unsuccessful, by phone;
- to contact you from time to time, where you have specifically consented to follow-up contacts by ArcelorMittal or its subsidiaries or affiliates, or to be put on our mailing list;
- for such other purposes to which you may consent from time to time;
- to detect and prevent fraud;
- perform the necessary due diligence checks for the purpose of recruitment or potential employment or entering into a commercial transaction; and
- for such other uses authorised by law.

PROCESSING OF SPECIAL PERSONAL INFORMATION

Special personal information refers to sensitive personal information that may relate to:

- the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or
- the criminal behaviour of a data subject to the extent that such information relates to:-
 - the alleged commission by a data subject of any offence; or
 - any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

We only process special personal information if (i) you have expressly consented to such processing; (ii) our processing of such information is necessary in terms of law or in order for us to exercise or defend a legal claim; (iii) the processing is for historical or statistical purposes and all legal conditions are met; or (iv) the special personal information was made public by the data subject.

DIRECT MARKETING

We only use your personal information to contact you from time to time, where you have consented to us doing so. We may also use your personal information to contact you and market our products directly to you if you are one of our existing customers. If you are an existing customer, we will only use your personal information if we obtained it through a sale of a product or a service to you and only in relation to similar products and services to the ones we previously provided to you.

We will ensure that you are given a reasonable opportunity to object to the use of your personal information for our marketing purposes when we collect your personal information.

RETENTION OF PERSONAL INFORMATION

We may keep a record of your personal information, correspondence or comments on file. We will utilise, disclose or retain your personal information for as long as necessary to fulfil the purposes for which that personal information was collected and as permitted or required by law.

We may retain your personal information for longer periods for statistical, historical or research purposes and should this occur, we will ensure that appropriate safeguards have been put in place to ensure that your recorded personal information is not processed for any other purpose.

Once the purpose for which your personal information was obtained no longer applies or becomes obsolete, we will ensure that it is deleted, destroyed or de-identified so that it can no longer be ascribed to you.

TRANSFER OR SHARING OF PERSONAL INFORMATION

General

We identify to whom, and for what purpose, we disclose your personal information at the time we collect such information from you and obtain your consent to such disclosure.

Transfers within the ArcelorMittal Group of companies

As a member of the ArcelorMittal Group of companies, we may, for intra-group reporting purposes and other business-related reasons, share personal information with members of the ArcelorMittal Group.

The ArcelorMittal Group has adopted a group-wide Binding Corporate Rules setting out standards of protection for personal information in case of transfer of personal information within the group.

The **Binding Corporate Rules** allow for the transfer of personal information within the ArcelorMittal Group and outside the territories or jurisdictions in which the relevant members of the ArcelorMittal Group operate. This transfer might happen for data hosting purposes, to execute the regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support, benchmarking or other business-related reasons.

We ensure that all affiliates, subsidiaries and other third parties that are retained to perform services on our behalf and are provided with personal information are required to comply with this Privacy Statement and our privacy practices.

Transfers to Third Parties

We may disclose your personal information to third-party service providers with whom we have contractual agreements in place that include appropriate privacy standards.

We will ensure that all third-party service providers take appropriate security measures to protect personal information in line with our policies and the applicable data protection laws. We will only permit third-party service providers to process personal information for specified purposes and in accordance with our instructions.

In order to ensure a high level of security of personal information, in particular if the information is being transferred outside of South Africa, we have in place standard contractual clauses, which seek to ensure that personal information shared with or transferred to third parties is treated in a way that is consistent with the data protection laws.

These are some of the instances where we may share your personal information with third parties:

- other group companies or divisions within Barloworld Limited;
- our employees, contractors and/or third party service providers/vendors (such as our website hosting partners, our service email marketing partners in connection with the Website);
- researchers and analytics provider(s), to the extent relevant to Barloworld Limited;
- our insurers, underwriters and professional advisors, including our accountants, lawyers, business advisors and consultants;
- employees and/or the managers of any entities through which they operate if we merge, combine or divest a part of our business;
- law enforcement or regulatory bodies as required by law;
- purchasers or potential purchasers of our business or parts thereof; and
- any other juristic or natural person for any authorised purpose with your express consent.

Transfers to jurisdictions outside South Africa

We may from time to time also share/obtain personal information with/from third parties, which may include transferring/obtaining employee personal information to/from countries outside the Republic of South Africa.

You should note that while your personal information is in that jurisdiction, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts, law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

In consideration of the above, we will ensure that we execute the appropriate contractual documents with the relevant third parties in accordance with the applicable data protection laws and policies to ensure that the personal information is adequately protected.

DATA SUBJECT ACCESS RIGHTS

Right of access to personal information

You have certain rights regarding the personal information that we hold about you, including the right to:

- access the personal information, where such access is necessary for you to exercise and/or protect any of your rights;

- request that the personal information be updated or rectified where it is inaccurate, incomplete or out of date;
- have your personal information processed in accordance with lawful processing conditions;
- be informed about how your personal information is being used;
- require us to delete or destroy a record of personal information where we are no longer authorised to retain the information;
- object at any time to the processing of your personal information for direct marketing purposes by contacting us;
- object to automated decision making which results in legal effects concerning you or similarly significantly affects you;
- object in certain situations to our continued processing of your personal information in certain circumstances.

We will ensure that your personal information is kept as accurate, complete and up-to-date to the extent reasonably possible. We will not routinely update your personal information unless such a process is necessary. We expect you, from time to time, to supply us with written updates to your personal information when required.

At any time, you can challenge the accuracy or completeness of your personal information in our records. If you successfully demonstrate that your personal information in our records is inaccurate or incomplete, we will amend or delete the personal information as required. Where appropriate, we will transmit the amended or deleted information to third parties having access to your personal information.

We have developed, implemented and will maintain the access to information (**PAIA Manual**) as well as procedures and processes to give effect to the data subject rights manual as required in terms of the Promotion of Access to Information Act, No. 2 of 2000.

All requests for access to information, including personal information, have to be made using the standard request procedure set out in the PAIA Manual.

SECURITY MEASURES / SAFEGUARDS

We have implemented physical, organisational, contractual and technological security measures to protect your personal information from loss or theft, unauthorised access, disclosure, copying, use or modification. The only employees who are granted access to your personal information are those with a business 'need-to-know' or whose duties reasonably require such information.

The security measures include:

- Firewalls; authentication software; intrusion detection systems; unique user profiles; encryption;
- Anti-virus and anti-malware software and update protocols;
- Logistical and physical access control, alarm systems, biometric access barriers, video monitoring, and
- Cybersecurity incident response plan.

Our employees, contractors and third parties will have access to personal information only if it is needed for the performance of their duties, and any processing of personal information will take place in accordance with our instructions.

We will provide you and the information protection regulator with detailed written notification should there be a security breach or a reasonable belief of a security breach which allows unauthorised persons to access your personal information. We will provide such notification as soon as reasonably possible after we discover a security compromise.

STORAGE OF PERSONAL INFORMATION

We keep the personal information that we collect from you on site, at our various offices where we operate within the Republic of South Africa, as well as off-site. Our service providers, which include data storage and processing providers operating both in the Republic of South Africa and, in certain instances, outside of the Republic of South Africa, may, from time to time, also hold your personal information in connection with the purposes for which you provided your consent. We will ensure that any data processors that we utilise to deal with or process your personal information comply with the provisions of this Privacy Statement.

DATA BREACHES

In addition to the physical, organisational, contractual and technological security, we have implemented a breach management procedure that details actions that need to be taken in the event of any actual or suspected security breach of personal information.

The breach management procedure details how we will deal with any suspected data security breach and, where applicable, notify the data subject, any person and any applicable regulator of a breach under certain conditions.

The breach management procedure also details the obligations and expectations of all our employees to report suspected data breaches.

TRAINING

All our employees are required to undergo regular training covering data privacy/protection laws, as well as policies and procedures.

FEEDBACK AND COMPLAINTS

All comments, questions, concerns or complaints regarding your personal information or this Privacy Statement and related policies should be forwarded to us at:

Attention: the Information Officer / Deputy Information Officer

In writing: Office N3-5, Main Building, Delfos Boulevard, Vanderbijlpark, 1911

Per email: infocompliance@arcelormittalsa.com

Provide us with all relevant information to enable us to assist you efficiently. Your query should contain sufficient details, including sufficient facts, dates and supporting documentation. You should also include your contact details.

If the matter is not resolved to your satisfaction or you are unhappy with the way that we treat your personal information, you are also entitled to lodge a complaint with the Information Regulator established for the purposes of ensuring compliance with POPIA. The contact details of the Information Regulator are as follows:

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg.

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg 2017.

Email: enquiries@inforegulator.org.za [General queries]

POPIAComplaints@inforegulator.org.za [POPIA complaints]

PAIAcomplaints@inforegulator.org.za [PAIA complaints]

Website: <https://www.inforegulator.org.za>

REVIEW AND UPDATE

We may update this Privacy Statement at any time and publish the updated version on our website.

ArcelorMittal Group Structure

ArcelorMittal South Africa Group

