

## Privacy Policy for third party

Approved by the Leadership Team on June 21, 2018

### Short Description :

At Aperam, we take privacy and confidentiality matters very seriously. We have developed this privacy policy for third parties (hereinafter the “**Privacy Policy**”) to clearly define our ongoing commitment to protecting privacy rights and to explain how we collect, use and disclose the personal information as required by applicable law or as we require in the course of fulfilling our professional responsibilities and operating our business.

This Privacy Policy is issued by APERAM S.A (hereinafter “**Aperam**”), a public limited liability company (*société anonyme*) formed under the laws of Luxembourg, with registered offices at 12C, Rue Guillaume Kroll, L-1882 Luxembourg, Grand Duchy of Luxembourg, registered within the *Registre de Commerce et des Sociétés* in Luxembourg under the number B155908. It applies to all subsidiaries and affiliates of the Aperam Group. References to “**Aperam**”, “**we**” or “**us**” in this Privacy Policy include all such subsidiaries and affiliates.

### Scope:

This Policy applies to all employees of Aperam and Its subsidiaries, clients, customers, suppliers, consultants, third party providers of Aperam, shareholders, representatives, Investors, analysts, rating agencies, banks etc...

The guidelines set out in this Policy are mandatory and, as such, must be observed by every one of us at all times.

### 1. Definitions

The terms and expressions in capital letters used in the Privacy Policy have the meanings set forth below. Words in singular include the plural and vice versa. These terms and expressions shall always be interpreted according to applicable data protection rules including, but not limited to, the European Union Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, as may be amended, replaced or re-enacted (the “**Data Protection Legislation**”).

“**Data Subjects**”: means natural persons whose personal data is being processed by Aperam.

“**Personal Data**”: means any information allowing the direct or indirect identification of an individual.

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**“Technical and Organizational Security Measures”:** means measures aimed at protecting Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, in particular where the processing involves the transmission of Personal Data over a network, and against all other unlawful forms of processing.

### 2. Collection of Personal Data

**When does Aperam collect your Personal Data?** Aperam collects and stores Personal Data relating to Data Subjects having interactions with Aperam in accordance with Data Protection Legislation. Data Subjects may include, but are not limited to the following categories of individuals:

- existing or prospective - clients/customers/suppliers/consultants/third party providers of Aperam;
- employees, shareholders, contact persons, representatives, beneficial owners and any other related individuals pertaining to or related to above entities
- Investors, analysts, rating agencies, banks etc
- representatives, employees, contact persons, shareholders, beneficial owners and any other related individuals of third parties or to which Aperam is in a contractual and/or commercial relationship for the provision or supply of services and/or products.

**Types of Personal Data.** Personal Data collected and stored by Aperam may include, but are not limited to, the following types of data:

- identification data (such as name, family name, date and place of birth, gender, picture);
- contact information (such as phone numbers, address, email address);
- other relevant personal details (nationality, citizenship);
- government identification numbers (social security numbers, tax number, copy of ID card);
- types of services received/provided or of products bought/sold;
- financial and banking information (notably linked to account number); and
- any other Personal Data reasonably related to the conduct of Aperam’s business.

Most of the Personal Data we process is information that is knowingly provided to us directly by Data Subjects. However, please note that in some instances, we may process Personal Data received from a third party with the Data Subjects’ knowledge.

**Purpose of the processing of Personal Data.** Personal Data shall mainly be processed for the following purposes:

- the performance of any contractual obligations towards the Data Subjects;
- for compliance with legal obligations such as, for instance, compliance with applicable commercial law and laws on anti-money laundering, Economic Sanctions,

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- tax identification (where appropriate), as well as compliance request from or requirements of regulatory and enforcement authorities; and
- for the purposes of the legitimate interests pursued by us or by third party that are necessary for Aperam to carry out its daily activities, for instance, for client/customer and third party providers relationship management, managing accounts and credits, providing products and services, vendor management, transmitting or executing payment instructions and transactions, to communicate efficiently with our investor and shareholder base, for fraud and other criminal activity prevention, payment verification, to enforce contacts with our clients, to implement changes in our corporate structure or ownership, to create statistics and tests, to manage risk, litigation (including disputes and collections), accounting and audits.

Aperam makes sure that only the Personal Data that are necessary to achieve the above-listed purposes are processed.

**Update of Personal Data.** Aperam will endeavor to keep the Personal Data in our possession or control accurate. Data Subjects providing Personal Data are therefore responsible for promptly informing Aperam of any change to their Personal Data.

### 3. Disclosure of Personal Data

Personal Data will not be shared with third parties, except as provided below.

**Disclosure of Personal Data.** We may disclose Personal Data to the following categories of recipients:

- subcontractors and external services providers (Example: shared service providers, Cloud service providers etc);
- professional advisors;
- public authorities and administrations;
- clients/customers of Aperam; and
- affiliated companies of Aperam.

Aperam may disclose Personal Data in the following circumstances:

- in the event of a legal request and/or investigation when, in our opinion, such disclosure is necessary to prevent crime or fraud, or to comply with any statute, law, rule or regulation of any governmental authority or any order of any court of competent jurisdiction;
- if we outsource some or all of the operations of our business to third party service providers, as we do from time to time: in such cases, it may be necessary for us to disclose Personal Data to those service providers. Sometimes the service providers may process some Personal Data on behalf of and under the instructions of Aperam. We restrict how such service providers may access, use, disclose, and protect that data;

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- in case of business transfers or in the event of the sale or acquisition of companies, subsidiaries, or business units: in such transactions, Personal Data may be part of the transferred business assets but remain subject to the protections in any pre-existing privacy statement; and
- when we believe release is appropriate or necessary to conduct the company's business, comply with the law, enforce or apply our policies and other agreements, or protect the rights, property or safety of Aperam, our employees, or others.

In such circumstances, Aperam ensures that Personal Data is kept secure from unauthorized access and disclosure.

**Transfer of Personal Data.** Being a global company, Aperam processes Personal Data in several countries and from different origins, and may transfer information in compliance with the Data Protection Legislation and any other applicable law. Aperam may share data in the normal course and scope of business with other affiliated companies as well as with other third parties listed above.

Data Subjects are informed that certain data recipients may be located outside the territory of the European Union in countries that do not offer a level of protection equivalent to the one granted in the European Union ("**Third Countries**").

Data transfers to affiliated companies and third parties located in Third Countries will, depending on the nature of the transfer:

- be covered by appropriate safeguards such as standard contractual clauses approved by the European Commission, in which case the Data Subject may obtain a copy of such safeguards by contacting us; or
- be authorized under the Data Protection Legislation, as the case may be, as such transfer is necessary for the performance or execution of a contract concluded at the Data Subject's interest or for the establishment, exercise or defense of legal claims or for the performance of a contract between the Data Subject and us.

#### 4. **Data Subjects' rights in relation to the processing of their Personal Data**

**Rights granted to Data Subjects.** In accordance with applicable law, Data Subjects are granted the following rights with regards to the processing of their Personal Data:

- the right to request access to their Personal Data stored by Aperam;
- the right to update or correct any of their Personal Data, if the Personal Data is incorrect or incomplete;
- the right to oppose to the processing of their Personal Data, on grounds related to their particular situation;

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- the right to request from Aperam the erasure of their Personal Data, to the extent such Personal Data (i) are no longer necessary in relation to the initial purpose(s) for which they were collected, (ii) consent has been withdrawn and there is no other means of legitimating the processing of Personal Data, (iii) the Data Subject objects to the processing of the Personal Data, (iv) the Personal Data is unlawfully processed;
- the right to request the restriction of the processing of Personal Data, if such Personal Data is found to be inaccurate or unlawful, is no longer needed for the purposes of the processing, or should a court decision on a complaint lodged by a Data Subject be pending;
- the right to data portability;
- the right to withdraw any consent given in the context of this Privacy Policy; and
- in the event of a dispute between the Data Subject and Aperam regarding the processing of Personal Data which failed to be resolved by the parties in an amicable manner, the right to lodge a complaint with the Luxembourg Data Protection Authority (the *Commission Nationale pour la Protection des Données* - CNPD). Data Subjects not residing in Luxembourg can contact their local Data Protection Authority.

Aperam will respond to individual complaints and questions relating to privacy and will investigate and attempt to resolve all complaints. Aperam undertakes to handle each request by a Data Subject free of charge and within a reasonable timeframe.

**How to exercise such rights.** Data Subjects can exercise the rights mentioned above or challenge compliance with this Privacy Policy, by contacting Aperam by email at [dataprotection@aperam.com](mailto:dataprotection@aperam.com) or by mail at the following address: Aperam, 12C, Rue Guillaume Kroll, L-1882 Luxembourg, Grand Duchy of Luxembourg at the attention of the Data Protection Officer.

### 5. Data retention

Aperam undertakes not to use the Personal Data for purposes other than those for which it has been collected and that such information shall not be stored for a period longer than necessary for the realization of such purposes.

Retention periods shall, in any case, be compliant with any applicable law and proportionate to the purposes of the processing.

### 6. Technical and Organizational Security Measures

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Ensuring that Personal Data is appropriately protected from data breaches is a top priority for Aperam.

Aperam implements adequate Technical and Organizational Security Measures, such as, depending on the equipment, password protection, encryption, physical locks, etc., to ensure a level of security appropriate to the risks represented by the processing and the nature of the Personal Data to be protected.

Access to Personal Data is permitted to Aperam employees and other related individuals for the sole purpose of performing their professional duties, such individuals being subject to a confidential obligation.

### 7. Internal training program

Aperam ensures its employees are having the necessary awareness and trainings to handle personal data in line with legal requirements. Privacy training programs are an integral part of professional development within Aperam.

### 8. Amendment

Aperam reserves the right to change, supplement and/or amend this Privacy Policy at any time.

In such case, notification will be given through by email using the following address: [dataprotection@aperam.com](mailto:dataprotection@aperam.com), or any other methods allowed by Data Protection Legislation.

### 9. Contact

Aperam has set up a Data Protection Compliance Management Committee in order to manage and monitor compliance for Aperam with data protection obligations.

This Compliance Committee is composed as follows:

Chief Financial Officer, Head of Compliance, Head of Combined Assurance, General Counsel, Chief Information Officer, Head of Human resources (*Chairman*), Data Privacy Officer, Deputy Data Privacy Officer.

Global Data Protection Officer:

**Laurent Beauloye**

Company Secretary, Head of Communications & Sustainability

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Email: [dataprotection@aperam.com](mailto:dataprotection@aperam.com)

Tel.:T +352 27 36 27 103

### Local Data Protection Officers in each Aperam Entity

For any question or queries you may have regarding this Privacy Policy, please use the following email address: [dataprotection@aperam.com](mailto:dataprotection@aperam.com) or by mail at the following address: Aperam, 12C, Rue Guillaume Kroll, L-1882 Luxembourg, Grand Duchy of Luxembourg at the attention of the Data Protection Officer or contact your Data Protection Correspondent locally.