

## Privacy Notice for business partner

JFE Steel Europe Limited (hereinafter referred to as "the Company") collects personal data of customers or employees of business partners (hereinafter referred to as "Principals") located within the EEA region who provide personal data to the Company through business interaction.

Protection of the collected personal data of the Principal is a very important issue for the Company and its affiliates (collectively, "the Company Group").

In this Privacy Notice, as a data controller, we will explain to the Principals about how personal data which is provided or disclosed to us by the Principals is collected and processed.

Also, when we process personal data of the individual which we received or obtained from a third party, we will be the data controller or processor.

We will process personal data in accordance with regulations concerning personal data protection in each country (including GDPR, hereinafter referred to as "Data Protection Act").

If you want to know JFE Steel Corporation's Privacy Notice that explains the handling of personal data collected and processed by JFE Steel Corporation, please check [here](#).

### Purpose of processing

The Company collects and processes personal data of Principals for the purposes described below. This is necessary for the Company to pursue legitimate interests and to provide both the Company's and the Group's services and products sufficient for Principals.

- To offer products and services of the Company
- To ensure continuity of the Company's business
- To provide, improve and develop the Company's products, services and advertising.
- To make known the Company's policy and terms
- To improve safety and security
- For business management, data analysis, survey and audit etc. of the Company
- In order for the Company to comply with legal obligations and to protect the legal rights of the Company or third parties

- To make known changes in the Company's goods and services

The Company will process the data of the Principal for the above identified, clear and legitimate purposes and will not further process that data in a way that does not fit these purposes.

If the Company intends to process these collected data for another purpose, the Company will inform the Principal about it.

Your personal data is stored for the time strictly necessary for complying with the legal obligations of the Company, providing sufficient services to the Principal, and maintaining the Company's business activities. After which time, all relevant personal data will be deleted or rendered anonymous, unless their further retention is justified by the necessity to establish, exercise, or defend against a legal claim or to comply with a legal obligation in accordance with applicable statutory retention periods

The Company does not collect personal information from the Principal if the Principal is a minor (meaning under 16 years old). If you are a minor, please do not send personal information through this website without the clear consent and involvement of a parent.

#### Legal basis of processing

Based on the signed contract relationship between the Principal or employer of the Principal and the Company, the Company collects and processes personal data of the Principals on the following legitimacy basis.

- To carry out the obligation of a contractual relationship, such as sales, between the Principals or Principal's employer and the Company.

#### Types of personal data to collect

In order to achieve the purpose listed in this Privacy Notice, the Company needs to collect the following types of personal data.

Name, address, phone number, e-mail address, company name, department name, position title etc.

#### Sharing of personal data

The Company may share personal data with the Company group and third parties.

When we share personal data with data processors, the Company will take proper and

legal steps to transfer and to process the data.

If the data of the Principal within the EEA is shared between the Company Group outside the EEA or with a third company, the Company will conclude appropriately the standard contractual clauses approved by the European Commission.

### Records on personal data processing

If the Company is acting as the data controller or processor, the Company preserves records concerning the processing of personal data prescribed by the personal information protection rules.

### Security of personal data

The Company endeavors to maintain the accuracy of the acquired personal data and to take necessary and appropriate security measures to prevent unauthorized access to personal information, leakage, loss, falsification or damage of personal information.

If by any chance the Company is aware of infringement of personal data, the Company will evaluate the infringement, notify the supervisor as requested, and notify the affected data entity as necessary.

### Rights of The Principal

The Principal has the following rights regarding personal data collected and processed by the Company.

If Principal wishes to handle the personal data listed below, please contact the personal data inquiry counter below.

The Company will respond appropriately according to the obligation prescribed by the Data Protection act.

When you want

- ①to access the personal data we have
- ②to correct the personal data we have
- ③to delete the personal data we have
- ④to regulate our use of your personal data
- ⑤third parties to utilize the personal data we have
- ⑥to protest against our use of personal data
- ⑦to refuse automated individual decision-making.

As regards procedure, please be aware that we will request you to submit confirmation

documents and proceedings to confirm that you are a Principal or an agent.

In order to prevent falsification or leakage of the personal data of the Principal by a third party, we will reply by mail or e-mail only if we can identify the Principal or agent by the documents submitted.

We will respond as soon as possible, but it may take some time to answer in order to confirm the content of the applicable registered personal data and ensure the accuracy of the answer.

The application form and the confirmation form received from the Principal or the agent will not be returned.

Please note that the application forms are appropriately kept at each company, and confirmation documents will be disposed of by appropriate means at each company when the purpose is accomplished.

You have the right to make a complaint at any time to the competent supervisory authority for data protection issues.

### Contact

We will respond to all legitimate inquiries concerning information, coordination and deletion of personal data.

If you want to make such inquiries, please contact below.

Address : 15th Floor, The Broadgate Tower, 20 Primrose Street, London EC2A 2EW,  
U.K.

Mail : t-london@jfe-steel.co.jp

Addressee : JFE Steel Europe Limited Inquiry contact