## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR THE DATA SUBJECT IN THE MONITORING OF PREMISES BY CCTV

of U. S. Steel Košice, s.r.o. pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council

U. S. Steel Košice, s.r.o. pays the utmost attention to the processing of personal data of employees and other data subjects, as well as their protection, with an emphasis on the prevention of unauthorized interference with the privacy of natural persons and compliance with the principles of lawful processing.

Controller, U. S. Steel Košice, s.r.o., Registered office: Vstupný areál U. S. Steel, 044 54 Košice, Slovak Republic, CRN: 36 199 222, registered in Commercial Register of City Court Košice, Reg. No.: Section.: Sro, Insert No. 11711/V (hereinafter referred to as "Controller" or "USSK") processes all personal data in accordance with applicable law, in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (GDPR), and Act No.18/2018 Coll. on the protection of personal data and on amending and supplementing certain acts, as amended.

In this document, the data subject will find all the elements required by Article 13 of the GDPR, as well as other necessary information regarding the processing of personal data by USSK during the monitoring of premises by the CCTV system. Not all data subjects have their personal data processed for all purposes, depending on the need and circumstances, or the content of the performance of the activities assigned to the data subjects and their job description.

Controller may process the video recording through an processor - U. S. Steel Košice - SBS, s.r.o., Registered office: Vstupný areál U. S. Steel, 044 54 Košice, Slovak Republic, CRN: 00 697 745, registered in the Commercial Register of City Court Košice, Reg. No.: Section.: Sro, Insert No. 1341/V.

U. S. Steel Košice - SBS, s.r.o., is also a co-controller alongside USSK and may process CCTV footage for the purpose of monitoring its own employees in the performance of their duties. Data subjects – employees U. S. Steel Košice - SBS, s.r.o. are able to access detail information by calling: +421 55 673 9212.

USSK processes CCTV footage for the following purposes and under the following conditions:

## Purpose 1

Protection of the rights and legally protected interests of the Controller through the camera system in areas accessible to the public, in particular the protection of the property of the Controller as well as other persons, the protection of life and health of persons located in areas accessible to the public, or located in the USSK Entrance area, ensuring compliance with the principles of occupational health and safety, the investigation of adverse events, the prevention and detection of possible criminal activity, while the legal basis for processing is the legitimate interest of the Controller, namely ensuring the protection of the property of the Controller as well as of other entities, the protection of the life and health of persons located in areas accessible to the public, or located in the USSK Entrance area, ensuring compliance with the principles of occupational health and safety, investigation of adverse events, prevention and detection of possible criminal activity.

 $Data\ subjects-natural\ persons\ located\ in\ areas\ belonging\ to\ USSK\ accessible\ to\ public-for\ example,\ parking\ lots,\ USSK\ Entrance\ area.$ 

## Purpose 2

Protection of the rights and legally protected interests of the Controller by means of a camera system in areas not accessible to the public, in particular: monitoring of the technological process of production, protection of the property of the employer as well as other person's property, protection of life and health of persons located in areas not accessible to the public, compliance with the principles of occupational Page 1/3

health and safety, investigation of adverse events, prevention and detection of possible criminal activity, where the legal basis for processing is the legitimate interest of the Controller, namely ensuring the protection of the Controller's property as well as that of other entities, the protection of life and health of persons located in areas not accessible to the public, monitoring of the technological process of production, ensuring compliance with the principles of occupational health and safety, investigation of adverse events, prevention and detection of possible criminal activity.

Data subjects - Controller's employees or natural persons located in areas belonging to USSK

The retention period is three days, after which the records are deleted. The retention period for video records for IT boxes is 7 days as it is not possible to physically ensure immediate removal of the handed over equipment from the box and in the event of an incorrectly handed over item, it is necessary to ensure the appropriate procedural matters with the person handing over the item are dealt with. In the case of an adverse event, a legal hold occurs - the time limit is extended until it is rectified or dealt with, but not beyond three years (general limitation period).

All persons entering the premises monitored by the CCTV system are automatically recorded. This does not mean that they are also identifiable. When an incident occurs or escalates, the CCTV operator shall dispatch a patrol to the site to ensure the legitimate interest of the Controller.

The Controller does not disclose personal data to any third parties other than those required to do so by law or these terms and conditions for processing of personal data (law enforcement authorities, courts, other authorized bodies – e.g. the National Labour Inspectorate). It also does not transfer personal data to third countries (outside the European Union/European Economic Area) and does not process them for the purpose of carrying out automated decision-making, including profiling.

With regard to the processing of CCTV footage as personal data, the recorded data subject has in particular the following rights:

- 1. Require confirmation from the Controller on the basis of a request as to whether or not are their personal data being processed, under what conditions, including the scope, purpose and duration of the processing, and information about the source of the personal data concerned.
- 2. Upon request, require the Controller to correct incorrect or outdated personal data, or to complete incomplete personal data.
- 3. Upon request, require the Controller to erase/destroy personal data, if:
  - a. the personal data are no longer necessary for the purpose for which they were collected or otherwise processed,
  - b. where the data subject objects to the processing of the personal data on the grounds of a legitimate interest and there are no overriding legitimate grounds for processing,
  - c. the personal data are processed unlawfully,
  - d. in order to comply with a legal obligation, the personal data must be erased.
- 4. Upon request, require the Controller to restrict the processing of personal data, if:
  - a. the data subject objects to the accuracy of the personal data, during a period allowing the Controller to verify the accuracy of the personal data,
  - b. the processing of the personal data is unlawful, and the data subject objects to the erasure of the personal data and requests instead the restriction of their use,
  - c. the Controller no longer needs the personal data for the purpose of processing the personal data, but the data subject needs them to assert a legal claim.
- 5. Upon request, require the Controller to provide the personal data concerning them and, if technically feasible and if the processing is carried out by automated means, also have the right to transfer that personal data to another controller.

## 6. Right to object to the processing of personal data

The data subject may object at any time to processing of their personal data which is based on the legitimate interests of the Controller even without providing any reasons. The Controller shall give due consideration to the objection. Unless the Controller demonstrates that it has compelling legitimate grounds for the processing and that these override the interests, rights, and freedoms of the data subject, it shall no longer process their personal data.

The data subject shall be able to submit the objection to the address: U. S. Steel Košice, s.r.o., Registered office: Vstupný areál U. S. Steel, 044 54 Košice, Slovak Republic, or through e-mail at dataprotection@sk.uss.com.

7. File a petition with the Office for Personal Data Protection of the Slovak Republic.

Requests in relation to the above rights may be made by the data subject to the Data Protection Officer (also called Person Responsible according to GDPR) at

e-mail address: dataprotection@sk.uss.com or at

mail address: Data Protection Officer

Vstupný areál U. S. Steel

044 54 Košice

You can also make a report through the U. S. Steel Ethics and Safety Line if you have any suspicions regarding a violation of data protection regulations:

phone: +421 55 684 2289

Internet: www.ussteel.com/corp/EthicsLine address: U. S. Steel Ethics and Safety Line

Vstupný areál U. S. Steel

P.O. Box 17 044 54 Košice