

Privacy Notice pursuant to Article 13 and 14 GDPR concerning personal data processing of data subjects

U. S. Steel Europe - Italy S.r.l. pays attention to processing and protection of personal data of its employees, and other data subjects, with emphasis on prevention of unauthorized interference with the privacy of natural persons and the respect for the principles of lawful processing.

The Controller, company U.S. Steel Europe - Italy S.r.l., Via G.Boccaccio, 45 – 20123 Milano, Italy VAT 07941900966 (hereinafter as „Controller “ or the “ Company”) processes all personal data in accordance with applicable laws, 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 and repealing Directive 95/46/EC (GDPR).

This document is intended for data subjects, personal data of whom are processed by U. S. Steel Europe - Italy S.r.l.

a) The legal basis and purpose of processing:

1. Certain legal regulations lay duties on the Controller to process personal data of data subjects and **the processing is inevitable to fulfill legal obligations of the Controller**. In such case, the data subject's consent is not required, and data subjects shall support such processing of their personal data and provide it for processing. Without the provision of their personal data Controller will not be able to fulfill its statutory requirements, and this could have negative impact on both Controller as well as data subject.

The following **purposes** fall under this legal basis:

- Fulfillment of duties of the Controller, as the employer, (e.g. HR, payroll agenda);
- Fulfillment of legal obligations resulting from tax or accounting regulations;
- Fulfillment of legal obligations concerning selected legal obligations;
- Management of corporate documents;
- Registry and archive administration.

2. At the same time U. S. Steel Europe - Italy S.r.l as the employer, has to process personal data **inevitable for fulfillment of agreements** (especially labor agreement), where one contracting party is the data subject/ employee or upon the request of the data subject, measures would be taken before agreement signing. Also in this case Us Steel Europe-Italy Srl as the Controller, is authorized to collect personal data directly from the data subject /employee without his/her consent, without provision of such data U. S. Steel Europe - Italy S.r.l. cannot come into contractual relation with the data subject/ employee.

Especially the following **purposes** fall under this legal base:

- Activities concerning HR and payroll agenda
- Contractual relationships with physical entities

3. At the same time U.S. Steel Europe - Italy S.r.l. can and shall process, without the consent of the data subject , the personal data necessary for the U.S. Steel Europe –Italy S.r.l. legitimate interests, for example to protect the company, to provide you with any services (for example HR services) and to keep records up to date and accurate.

The following **purposes** fall under this legal basis, including but not limited to:

- Protection of U. S. Steel Europe - Italy S.r.l. legal interests, including debt recovery and lawsuits
- Performance of business activity of the company - sales and marketing support, activities of commercial representation for its parent company
- Provision of communication and information devices, systems and applications, granting technical support and access rights to applications
- Ensuring network and information security, as well as cyber security

- Running of so called Ethics Line
 - Compliance agenda
4. If personal data is not processed by means of the methods listed above, U. S. Steel Europe - Italy S.r.l. can process personal data in exceptional and isolated cases based on voluntarily granted consent of a data subject for purposes specified in the consent, for instance for making or using photographs in some cases. Provision of personal data in the form of consent is voluntary and free.

Data subject can anytime withdraw its consent as of the date of delivery of the written consent withdrawal to the U. S. Steel Europe - Italy S.r.l. address. Consent withdrawal has no influence on the legality of processing resulting from its consent before the withdrawal.

b) Processors:

Controller has the right (mainly based on written agreement concluded according to article 28 GDPR) to delegate a Processor to process personal data of Controller. For the purpose of delegating personal data processing to a Processor, the consent of data subject is not required.

For selected processing of personal data of the data subjects specified above Us Steel Europe-Italy Srl uses the following processors:

- **U. S. Steel Košice, s.r.o. (USSK)**, Registered Office: Vstupný areál U. S. Steel, 044 54 Košice, Slovak Republic, CRN: 36 199 222, Incorporated in the Companies Register of District Court Košice I, Incorporation No.: Sec: Sro, File No. 11711/V, provision of technical support and access to applications,
- **Studio Antonio Zito – Dottore Commercialista**, Registered Office: Via Privata delle Stelline, 1 – 20146 Milano, accounting and payroll services,
- **Studio Parisi e Associati (Avv. Mauro Caminada)**, Registered Office: Via Rivoli n. 2, 20121 Milano, legal services,

From time to time certain processor may be added or removed. For most current list of processors, please contact Alberto Marostica - AMarostica@sk.uss.com

- c) Categories of processed personal data:** Identification data, contact data, login data to applications (for instance AD login), data necessary for maintaining the HR and payroll agenda, personal data on accounting and tax documents and certificates,
We process personal data which we receive directly from data subjects – employees or from clients and other concerned parties in connection with our business relationship. Moreover, sometimes we process personal data legitimately obtained from publicly accessible sources.

- d) Categories of recipients:** U. S. Steel Europe - Italy S.r.l. provides the personal data to third parties only if it is required by legal regulations and in selected cases to the mother company U. S. Steel Košice, s.r.o. in Slovakia (USSK) and through USSK in selected cases to ultimate parent company United States Steel Corporation, USA.

- e) Retention period:** U. S. Steel Europe - Italy S.r.l. shall process the personal data for the duration of the purpose of processing and will retain the data for the period specified by applicable laws, internal regulation, operating reasons or legitimate interests of the Controller.

- f) Data subject rights:** The data subject has the right to request the following from the Controller:

- Access to his/her personal data;
- Correction of personal data;
- Erasure of his/her personal data or limitation of processing of the personal data;
- The right to object to personal data processing,
- The right to data portability;

You may apply these right at the following address: U. S. Steel Europe - Italy S.r.l., Via G.Boccaccio, 45 – 20123 Milano, Italy or email dataprotection@sk.uss.com

- Additionally, data subjects have the right to lodge a complaint with a national personal data protection supervisory authority in Italy.

g) Transfer to third countries:

The specific personal data processing operations are performed by means of applications provided by the mother company U. S. Steel Košice, s.r.o. located in Slovakia or ultimate parent company United States Steel Corporation with headquarters in U.S.A., or its subcontractors. When using specified applications, the cross-border transfer of employees' personal data to U. S. A. takes place. The applications are used mainly to fulfill the work tasks concerning labor relations.

Also, with respect to global character of the company U. S. Steel Europe - Italy S.r.l., some limited personal data is transferred and processed by the company U. S. Steel Košice, s.r.o. in Slovakia as controller and United States Steel Corporation as another controller, mainly (but not exclusively) for the following purpose:

- A. Administration of global commercial, and other human resources activities, including (but not limited to):
 - a) Processing of personal data for effective management of human resources;
 - b) Processing of personal data for human resources administration (such as compensation – Short-Term Incentive Program and Long-Term Incentive Program, pensions, jubilees);
 - c) Performance of Talent Management process, including deployment of global, centralized, electronic system for implementation and processing of performance management and succession planning functions and evaluation of performance; and
 - d) processing of personal data in relation to recruiting
- B. Corporate agenda – processing in relation to performance of control as a sole shareholder, preparation of general assembly, supervisory board meetings, minutes from meetings and other corporate documents, preparation of documents for commercial register and other offices
- C. Compliance - administration of global commercial, and other activities, especially effective management of compliance function, including (but not limited to):
 - a) Processing of personal data to provide online and other kinds of trainings as well as similar activities;
 - b) Processing and access to data from reports made on the U. S. Steel Ethics Line and their investigation
 - c) Processing and access to data generated or maintained by Internal Audit unit; and
 - d) Processing and access to data obtained in relation to monitoring of compliance with company anticorruption policy