

Information on the Processing of Personal Data

Personal data Administrator:

ArcelorMittal Distribution Czech Republic, s.r.o., Co. Reg. No.: 25743244

With registered office in Prague 1 - Nové Město, Biskupský dvůr 1146/7, Postal Code 11000
Incorporated in the Commercial Register maintained by the City Court in Prague, Section C, Insert 66195,

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Contact person in all matters relating to the processing of personal data:

Ing. Ivana Radomská

(hereinafter also referred to as the "Administrator")

ArcelorMittal Distribution Czech Republic, s.r.o., Co. Reg. No.: 25743244, with registered office in Prague 1 - Nové Město, Biskupský dvůr 1146/7, Postal Code 11000, incorporated in the commercial register maintained by the Municipal Court in Prague, Section C, Insert 66195, as administrator of personal data granted to the company, or which was acquired in connection with its activities, hereby informs the data subject that this personal data is processed in accordance with the relevant legal regulations, in particular the Regulation (EC) No 2016/679 of the European Parliament and of the Council of 27. April 2016 on the protection of private individuals with regard to the processing of personal data and on free movement of such data and on the repealing of Directive 95/46/EC (general regulation on the protection of personal data - GDPR, hereinafter also referred to as GDPR), and the Act on processing of personal data No. 111/2019 Sb., as amended.

Main principles in the processing of personal data:

Legality, correctness, transparency: The processing of personal data is only possible in a fair, legal and transparent manner, and only on the basis of legal titles defined in the regulation. The Administrator is obliged to ensure awareness of the data subjects to the greatest degree possible and proceed in the processing of personal data openly and in accordance with GDPR.

Purpose limitation: The purpose of processing of personal data is determined by the framework of operations which may be implemented within a given purpose of data processing. The determining of the purpose is a key responsibility of the Administrator. It is prohibited to process personal data for purposes other than those for which it was collected. There are exceptions (e.g. if the data subject grants his consent, if the new purpose of processing is compatible with the original one etc.). Processing for other purposes is called 'further processing'.

Minimising of data: Only such personal data is processed and collected which is relevant and appropriate in relation to the purpose of processing and only to the extent necessary for the fulfilment of a defined purpose. If it is possible to achieve the purpose without the processing of certain personal data, it is necessary to stop processing such surplus personal data.

Accuracy: Processed data must be accurate and must correspond to reality and if necessary (according to the nature of the processing) the Administrator is obliged to perform its update. As soon as the Administrator or processor determines that the data is inaccurate it shall take all reasonable measures to ensure that such inaccurate data is corrected or destroyed. Accuracy shall

be ensured in the course of processing as well as data collection to the extent of a risk of a possible harm to the data subject. The Administrator is not responsible for inaccuracy of any information if the data subject provides untrue information.

Limitations and form of keeping: Personal data is kept only for the period necessary for the purposes for which the personal data is processed. After the end of this period an obligation is imposed on the Administrator to destroy (erase or make anonymous) the personal data, this does not apply if there exists an exception from this obligation pursuant to GDPR. Personal data is kept in a form which does not allow access of unauthorised persons to this data.

Integrity and confidentiality: Personal data is processed in such a way which ensures its security against unauthorised or unlawful processing and also destruction, damage or loss etc.

BASIC TERMS:

"Personal data" shall mean all information relating to an identified or identifiable private individual, an identifiable private individual is one that may be identified directly or indirectly, especially by reference to a certain identifier, e.g. a name, identification number, tracking data, network identifier, or one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity of such private individual;

"Special category of personal data" shall mean personal data referring to ethnic origin, political opinions, religious belief, philosophical beliefs or trade union membership, as well as genetic data, biometric data, data on health or sex life or sexual orientation of a private individual;

"Data subject" shall mean a private individual who is the personal data subject (may mean a member of staff, a customer, a member of authority of the Administrator, representatives of a supplier, purchaser, etc.);

"Processing" shall mean any operation or a set of operations involving personal data or sets of personal data, implemented with or without aid of automated processes, such as collection, recording, organising, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other disclosure, sorting or combining, restrictions, erasure or destruction (this is not an exhaustive list);

"Further processing" means the processing of personal data for a purpose other than that for which it was originally collected, e.g. a further processing of freely available data (public data from a land register, which was originally collected for the purpose of keeping of the land register records.);

"Administrator" shall mean any natural or legal entity, public authority, agency or any other entity which alone or jointly with other determines the purposes and means of processing of personal data;

"Processor" shall mean any natural or legal entity, public authority, agency or any other entity which processes personal data on behalf of the Administrator; under certain conditions, an Administrator may be also in the position of a Processor or it may be an entity which provides accounting services, IT services, etc. on behalf of the Administrator;

CATEGORIES OF PERSONAL DATA:

1) General:

- The address and identification data used for unanimous and unmistakable identification of the data subject (for example the name, surname, title, or birth certificate number, date

of birth, address of permanent residence, company registration number, tax registration number) and data enabling contact with a data subject (contact details - e.g. contact address, telephone number, fax number, e-mail address and other similar information)

- descriptive data (e.g. bank details)
- other information necessary for implementation of the contract
- information provided above and beyond the relevant laws processed within the framework of a consent granted on the part of the data subject (processing of photographs, use of personal data for the purpose of HR management etc.)

2) Special:

- Personal data referring to racial or ethnic origin, political opinions, religious beliefs or philosophical beliefs or a trade union membership and the processing of genetic data, biometric data for the purpose of a unique identification of a private individual and data on medical condition or sexual life or sexual orientation of a private individual.

The processing of special category of personal data is generally prohibited apart from exceptions provided in GDPR.

The Administrator processes a special category of data only to a minimum degree, always on the basis of a justified legal entitlement (in particular in case of an accident at work of a member of staff).

PERSONAL DATA SOURCES

The Administrator acquires personal information:

- directly from the data subjects (obtained as part of negotiations on entering into a contract, in person, via e-mail, telephone, chat, web page, name card, etc.)
- distributors, suppliers, customers, other administrators etc. - in negotiations on entering into a contract,
- publicly accessible registers, lists and records (e.g. commercial register, trade register, land register, public telephone list etc.)

LEGAL BASIS FOR THE PROCESSING:

Personal data may be processed only on the basis of these legal titles:

- 1) the processing is **necessary for the performance of a contract**, whose party is the data subject or whose representative is the data subject, or for implementation of the measures adopted before the entering into a contract at request of this data subject.
- 2) the processing is necessary for **compliance with a legal obligation** appertaining to the Administrator;
- 3) the processing is necessary for the **protection of vitally important interests** of the data subject or of another private individual;
- 4) the processing is necessary **for the purposes of legitimate interests** of the given Administrator or a third party, except cases where priority before such interests is given to interests or fundamental rights and freedoms of the data subject which require protection of personal data;
- 5) the processing is necessary **for performance of a task carried out in the public interest or in the exercise of public authority**, for which the Administrator is responsible;
- 6) the data subject granted his **consent to the processing** of his personal data for one or more specific purposes

The Administrator processes the personal data always on the basis of a legal title, in particular on the basis of implementation of a contract, implementation of a statutory obligation or a legitimate interest.

THE PURPOSE AND SCOPE OF PROCESSING

The purpose of the processing is especially the fulfilling of contractual obligations under an entered-into contract and implementation of legal obligations as concerns the employees.

The purpose of the processing may also be:

- objectives contained within the framework of a consent of the data subject
- negotiations on a contractual relationship
- performance of a contract
- protection of rights of the Administrator, recipient or any other persons concerned (e.g. recovery of claims of the Administrator)
- keeping of an archive based on the law
- selection procedures for vacancies
- implementation of legal obligations on the part of the Administrator
- protection of vital interests of the data subject

Personal data is processed by the Administrator to the extent to which the given data subject provided it to the Administrator in the context of entering into a contractual or other legal relationship with the Administrator, or which the Administrator otherwise collected and processes in conformity with the applicable legislation or in order to fulfil legal obligations of the Administrator or in its legitimate interest.

RECIPIENTS of personal data may be:

- Subcontractors of services
- Public authorities (e.g. courts and administrative authorities, and other offices)
- Further recipients in accordance with the needs and customer instructions in the context of implementation of a contract
- Processors of personal data - providers of information system maintenance, external accountants, providers of cloud software, external carriers etc.

METHODS OF PROCESSING AND PROTECTION OF PERSONAL DATA

The processing of personal data is carried out by the Administrator.

The processing is carried out in its premises, branches and headquarters of the Administrator by the individual responsible employees of the Administrator, or the processor. In the event that personal data is transmitted on the basis of a valid title to other entities - processors, the Administrator concluded with these entities written processing contracts in accordance with GDPR.

Processing at the Administrator takes place mainly through information technology; or manually in case of personal data in paper form while complying with all the security guidelines for administration and processing of personal data. To this end the Administrator adopted technical-organisation measures to ensure protection of personal data, in particular measures to prevent unauthorized or accidental access of personal data, its alteration, destruction or loss, unauthorised transfer, unauthorized processing or other abuse of personal data.

All entities to whom the personal data may be made available, respect the right of data subjects to protection of privacy and are obliged to follow the existing legislation on the protection of personal data.

The Administrator shall inform the data subjects that no automated decisions or profiling in the processing of personal data takes place. Also, personal data shall not be transmitted by the Administrator to third countries.

PRINCIPLES OF PROCESSING OF PERSONAL DATA

Personal data is processed by the Administrator in the narrowest range possible, for a period strictly necessary, i.e. the period indicated in the filing and discarding regulations of the Administrator, or in the relevant legal regulations, or for the period necessary for the exercise of the rights and protection of the legitimate interest of the Administrator.

Personal data is always processed for as long as it is necessary to ensure the rights and obligations arising from contractual relationship as well as the relevant legislation.

The Administrator takes care of updating of the data and hereby asks the data subjects to report any changes.

Shredding and destruction is governed by the regulations of the Administrator and the relevant legal regulations.

RIGHTS OF DATA SUBJECTS

The GDPR provides a the data subjects with a series of rights relating to the processing of personal data.

A data subject shall have the right to obtain from the Administrator a **confirmation whether the personal data relating to his person is or is not processed**, and if so, the data subject has the right **to gain access to the personal data**, which means that the data subject has a right to obtain information from the Administrator on whether it processes his personal data, and if so, which data this is in respect of and in what manner it is processed.

The data subject also **has a right to be informed in respect of the following:**

- the purpose of the processing,
- the category of the personal data concerned,
- the recipients or categories of recipients to whom personal data was or will be made available,
- the intended period during which the personal data will be stored,
- all available information about the source of personal data,
- if such was not obtained from the data subject, information on whether automated decision making, including profiling takes place.

The data subject in particular has a **right to be informed**.

The data subject is **entitled at any time to complete or rectify** any incomplete or inaccurate personal data.

Another right is the right to **deletion of personal data - if the conditions are met**, the Administrator is obliged to destroy personal data processed on the data subject if so requested by the latter.

The data subject has the **right for the Administrator** in certain cases **to limit the processing of** his personal data.

The data subject has **a right** at any time **to raise an objection** against processing which is necessary for the performance of a task carried out in the public interest or in the exercise of public authority, or which is based on legitimate interests of the Administrator, or a third party. When submitting an objection against processing for the purposes of direct marketing, personal data may no longer be processed for this purpose.

The right to transferability of data provides the data subject with an option to obtain personal data which was provided to the Administrator in a usual and machine-readable format. This data may be subsequently transmitted to another Administrator, or if such is technically possible, request the that the administrators forward such to each other (outwith the exceptions referred to in GDPR).

The data subject has a right **not to be subject to any decisions based purely on automated processing, including profiling**, which would have legal effects on the latter or similarly concerns his person (outwith the determined exceptions within GDPR).

In case of processing on the basis of a consent the data subject has a right at any time to withdraw the consent to the processing of personal data.

Exercise of the rights, applications, information:

In case that the data subject should request any information relating to the processing of his personal data by the Administrator, he may **primarily directly contact the Administrator, at the:**

e-mail address:

or in writing to the address

The request of the data subject shall be processed without delay, at the latest within [one month](#) of receipt of the request.

The time limit may be extended in exceptional cases for a period of two months, of which the data subject would be informed by the Administrator, including the reasons for such an extension.

The data subject may turn with his complaint to the Office for the protection of personal data.

For more information on further rights of the data subject go to the website of the Office for the protection of personal data. <https://www.uouu.cz/6-prava-subjektu-udaj/d-27276> () or do not hesitate to contact the Administrator.

This statement is publicly available on the internet site of the Administrator at [WWW.....](#)