

INFORMATION ON PERSONAL DATA PROCESSING OF DATA SUBJECTS – NON-EMPLOYEES

pursuant to § 15 sec. 1 et seq. of the Act No. 122/2013 Coll. on personal data protection as amended
(hereinafter referred to as "Data Protection Act" or "Act ")

This document contains required privacy notices as set out in § 15 sub. 1 et seq. of the Act and is intended for non-employee data subjects whose personal data is processed by the company U. S. Steel Košice, s.r.o. („USSK“).

1. Personal data processing, purpose and scope

USSK, located at Vstupný areál U. S. Steel, 044 54 Košice, Slovak Republic, incorporated in Commercial Register of District Court Košice I, incorporation number: Section.: Sro, entry No. 11711/V (hereinafter referred to also as "Controller"), processes in its filing systems the personal data of data subjects as a data Controller in accordance with applicable legal regulations. Filing systems ("FS"), defined in § 4 sub. (3)b) of the Act, are generally paper or electronic systems for processing personal data.

Certain laws require USSK to process personal data, entitling USSK to process them without the data subject's consent. The scope or list of such personal data that USSK must process is mandated by various legal regulations, including but not limited to:

- a) Labor Code (Act No. 311/2001 Coll. as amended)
- b) Act on Occupational Safety and Health (Act No. 124/2006 Coll. as amended)
- c) Act on Social Insurance (Act No. 461/2003 Coll. as amended)
- d) Act on Medical Insurance (Act No. 580/2004 Coll. as amended)
- e) Act on Income Tax (Act No. 595/2003 Coll. as amended)
- f) Civil Code (Act No. 40/1964 Coll. as amended)
- g) Code of Civil Procedure (Act No. 99/1963 Coll. as amended)
- h) Act on Inventions, Industrial Samples and Improvement Proposals (Act No. 527/1990 Coll. as amended)
- i) Act on Patents (Act No. 435/2001 Coll. as amended)
- j) Criminal Code (Act No. 300/2005 Coll. as amended)
- k) Act on Administrative Offences (Act No. 372/1990 Coll. as amended)
- l) Code of Administrative Procedure (Act No. 71/1967 Coll. as amended)
- m) Act on Court Executors and Execution Activity (Act No. 233/1995 Coll. as amended)
- n) Commercial Code (Act No. 513/1991 Coll. as amended)

USSK as Controller processes the personal data of data subjects:

- a) generally to fulfill its legal obligations under any applicable laws of the European Union or Slovak Republic, or international treaties which are binding on the Slovak Republic, that require data subjects to provide personal data to USSK;
- b) based on the written, voluntary consent of the data subject; and/or
- c) in order to fulfill contractual obligations.

Personal data is processed in the following USSK **FS***:

a) FS Personnel and Payroll

Purpose: to fulfill USSK's data Controller duties as an employer with respect to its personnel and payroll functions, including personal data processing in connection with the recruiting and job application process

b) FS OSHA (BOZP) (especially Contractor Safety Portal application- Steeltrack)

Purpose: to fulfill USSK's Controller duties as an employer related to compliance with occupational safety and health regulations

c) FS Corporate Security (especially Truck Entry Control System application)

Purpose: fulfillment of duties of Controller while ensuring security and protection of life and health regarding entering, moving within and leaving area of USSK, protection of USSK property values, within its area and facilities, making and issuing of personal ID cards

d) FS Security Cameras

* Not all data subjects have their personal data processed in all FS. Some FS are used according to need and circumstances, or according to the assignment of the data subjects.

Purpose: Protection of public order and security, detection of criminality, protection of property or health, detection and documenting of criminal activity

e) FS Access Rights (especially the applications Active Directory, Lotus Notes, Steeltrack, Apptio, HP PPM, SRS Security request system)

Purpose: to ensure appropriate user access to filing systems (or applications) required to perform the work duties of individuals approved for such access.

f) FS Accounting Documents

Purpose: to fulfill legal duties in connection with the processing of accounting documents

g) FS Protection of USSK's legitimate interests (the USSK Ethics Line)

Purpose: to protect USSK's rights and legally protected interests

h) FS relating to Law Section

Purpose: to fulfill the working duties of the Law Section, including but not limited to:

- handling of court, administrative offense or criminal proceedings, enforcement of debts from loans, drafting of agreements with individuals (e.g. related to movable and immovable property) and the company's internal registry created on the basis of requirements resulting from company internal regulations.

i) FS Activities of Director Public Affairs unit and IS Firm's Regular Publication

Purpose:

- to fulfill the working duties of the Director Public Affairs unit (handling of requests for financial support, including among other activities cooperation with the Archdiocese charity of Košice and the children's organization FRIGO), participation of individuals on social and employee events, identification of an individual during visits of USSK
- supporting documents for processing of reports for the plant's regular publication, professional fees and services for editorial staff, as well as competitions and advertising

j) FS Accommodation Services

Purpose: to fulfill legal duties related to lodging and other accommodation services provided at USSK's offsite training facility

Data subjects include, but are not limited to:

- persons participating in contractual and other legal relationships with USSK; and
- other data subjects based on various legal bases of personal data processing (e.g. with the data subject's consent, a written agreement, or pursuant to a legally binding act).

2. Processors /Third parties / Recipients

The Controller is entitled to entrust the processing of personal data to processors subject to written agreements for such processing. For the purposes of entrusting such third party processors with processing of personal data, the consent of the affected data subjects is not required.

USSK uses the following processors for selected processing of personal data:

- U.S. Steel Košice – SBS, s.r.o.

Address: Vstupný areál U. S. Steel, 044 54 Košice, Business ID No.(IČO): 00 697 745

Purpose: to perform activities of SBS, including but not limited to guard duty, protection of property, ensuring public order

- Detská organizácia FRIGO

Address: Jantárová 10, 040 11 Košice, Business ID No.(IČO): 35545054

Purpose: for handling applications and other tasks related to the Project USSK „Your chance to play“ for the support of young athletes

- United States Steel Corporation

Address: 600 Grant Street, Pittsburgh, Pennsylvania, USA – cross-border transfer - Safe Harbor

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Purpose: to provide support for computer applications, grant access to systems supported by United States Steel Corporation and provide system technical support

- **Kenexa Technology Inc.**

Address: 650 East Swedesford Road, Second Floor, Wayne, Pennsylvania 19087 USA - cross-border transfer - Safe Harbor

Purpose: to provide technical support for the electronic system that USSK uses to select and register its applicants for employment

USSK reserves the right to entrust the processing of personal data to other processors under written agreements for such processing. USSK publishes on its Internet site a list of the processors it uses to process personal data.

As Controller, USSK does not generally provide or make available personal data to third parties (aside from the processors identified above) unless it is legally required to do so by special legislation (primarily the Act on Social Insurance (Act No. 461/2003 Coll. as amended), Act on Medical Insurance (Act No. 580/2004 Coll. as amended), Act on Income Tax (Act No. 595/2003 Coll. as amended), Act on Police Force (Act No. 171/1993 Coll. as amended), Act on Court Executors and Execution Activity (Act No. 233/1995 Coll. as amended), Code of Civil Procedure (Act No. 99/1963 Coll. as amended) and others).

3. Cross-border transfers

For selected purposes, mostly the use of data processing services of processors, USSK transfers personal data across national borders. The cross-border transfer of personal data may be performed only in compliance with conditions and within the scope set forth by the Act. It occurs only after the conclusion of appropriate written agreements governing the transfer and processing of the personal data.

Selected processing of personal data is performed through certain electronic applications (especially Contractor Safety portal, Steeltrack, Security Request System („SRS“), Active Directory, Lotus Notes, HP PPM and Apptio) provided by United States Steel Corporation in the U.S.A. as the parent company of USSK. Through the use of these selected applications occurs the cross-border transfer of personal data to the U.S.A. Access to these applications is also provided to selected employees of USSK's third party contractors for purposes of fulfilling their contractual obligations to USSK.

United States Steel Corporation has certified its adherence to the “U.S.-EU Safe Harbor principles and is registered on the “Safe Harbor List” pursuant to Commission Decision of 26 July, 2000 pursuant to Directive of the European Parliament and of the Council 95/46/EC on the adequacy of the protection provided by the Safe Harbor privacy principles and related frequently asked questions issued by the U.S. Department of Commerce and provides an adequate protection of personal data.

The data is transferred to the following companies:

A) As Processors:

- **United States Steel Corporation**

Address: 600 Grant Street, Pittsburgh, Pennsylvania, USA (Safe Harbor certified)

- **Kenexa Technology Inc.**

Address: 650 East Swedesford Road, Second Floor, Wayne, Pennsylvania 19087 USA (Safe Harbor certified)

B) As Controller (in compliance with conditions set out by the law)

- **United States Steel Corporation**

Address: 600 Grant Street, Pittsburgh, Pennsylvania, USA (Safe Harbor certified)

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4. Rights of data subjects

4.1 Data subjects are entitled to submit written applications requesting from the data Controller:

- a) confirmation whether the data subject's personal data is or is not being processed;
- b) in a generally intelligible form the information about the state of processing of his personal data in the data Controller's filing system within the following scope: identification data of the Controller, identification data of the processor, purpose of personal data processing, list or scope of processed personal data, other supplementary information (e.g. instruction on voluntary or mandatory nature of providing personal data, time of expiration of the consent, if Controller processes personal data on the basis of data subject's consent, third parties with access, identities of recipients, form of publishing, third countries to which data is transferred) and the procedure of processing and evaluating operations;
- c) in a generally intelligible form the exact information about the source from which it obtained his personal data for processing;
- d) in a generally intelligible form the list of his personal data which constitute the subject of processing;
- e) rectification or erasure of his inaccurate, incomplete or outdated personal data, which constitute the subject of the processing;
- f) erasure of his or her personal data, if the purpose of its processing was fulfilled;
- g) if any official documents containing personal data constitute the subject of the processing, he may request to have them returned;
- h) erasure of his personal data which constitute the subject of processing, if there was a violation of law; and
- i) blocking of his personal data due to the cancellation of the consent for personal data processing before its expiration, if Controller processes personal data based on the consent of the data subject.

4.2 The rights of the data subjects according to point 4.1 subpoint. e) and f) may be restricted only if such restriction results from a special Act or its application would infringe the protection of the data subject or would infringe the rights and freedoms of others.

4.3 The data subjects, upon freely given written requests or in person if the matter cannot be postponed, shall be entitled to submit to the Controller their objections to the processing of their personal data, including disclosure to third parties, for purposes other than those for which the personal data was collected or subsequently authorized by the data subject. The Controller will consider such objections subject to applicable law.

4.4 The data subject shall be entitled at anytime to submit a request in writing or in person (if the matter is urgent) objecting to or refusing to submit to a decision by the Controller that would affect the data subject's legal rights or otherwise significantly affect the data subject if the Controller's decision is based solely on the results of the computer-automated processing of the data subject's personal data (rather than manual processing of such data). The data subject shall be entitled to request the Controller to reexamine the decision it made using a method other than the automated processing of the subject's data, and the Controller shall be obliged to satisfy the request in such a manner that the Controller's employees reexamine the decision manually. The Controller shall inform the data subject about the manner of the reexamination and the findings of the reexamination within 30 days from Controller's receipt of the data subject's request.

4.5 The data subject may exercise any of his or her rights under the Data Protection Act:

- a) in a written form submitted to the Controller that is clear from its content that he or she is exercising such right; an application submitted via electronic mail or fax must be delivered by the data subject in manual written form not later than three days from the date it was originally transmitted,
- b) in person in verbal form which is recorded, which must clearly identify the person exercising his or her right, what right under the Act he or she is exercising and who and when created the record, the recorder's signature and the signature of the data subject; the Controller shall be obliged to deliver a copy of the record to the data subject; or

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c) by applying to the processor in accordance with subpoint a) or subpoint b) above.

- 4.6 In case there are any questions related to personal data protection the data subject may contact the USSK Law Department, Special Projects Unit, Mgr. Eva Durziová tel: +421 55 673 9589 or JUDr. Silvia Šulcová - tel: +421 55 673 4931..

In case of any concerns the data subject can submit a report through the U. S. Steel Ethics Line:

Telephone: +421 55 684 2289

Internet: **www.ussteel.com/corp/EthicsLine**

Mail addressed to:

U. S. Steel Ethics Line

Vstupný areál U. S. Steel

P.O. Box 17

044 54 Košice

- 4.7 If the data subject suspects that his or her personal data is processed unlawfully, the data subject may submit a petition initiating the personal data protection procedure to the Office for Personal Data Protection of Slovak Republic.
- 4.8 If the data subject does not enjoy full legal capacity, his or her rights may be exercised by his legal representative.
- 4.9 If the data subject is deceased, the rights which he or she had pursuant to this Act may be exercised by his or her next of kin.
- 4.10 The data subjects are entitled to ask for identification of entitled person designated to obtain personal data.

Prepared by: USSK Law Department, Special Projects Unit

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