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<i>Recruitment Privacy Statement</i>	<i>NA</i>	<i>Information</i>	<i>2018-05-22</i>	<i>1(5)</i>
Document owner	Approved by	Last revision date		
<i>Privacy officer team</i>	<i>Maria Långberg EVP, People, Culture and Communications</i>	<i>2018-05-25</i>		

## **SSAB's Recruitment privacy statement**

This Privacy Statement informs why and how SSAB AB including its affiliates, and partners ("SSAB") collects, uses or shares personal data in connection with the recruitment process of a job applicant indicating his/her interest and applying a position through SSAB's online recruitment system or otherwise. SSAB encourages the job applicant to read this Privacy Statement prior submitting any of the personal data to SSAB.

SSAB is bound by the privacy legislation within each jurisdiction in which it operates. Sometimes the privacy legislation and applicants' rights in relation to privacy differs from one jurisdiction to another. In addition, specific privacy practices may be adopted to address the specific privacy requirements of particular jurisdictions. Therefore, if this Privacy Statement is in conflict with the law of the jurisdiction in question, the local law takes precedence to the extent applicable.

### **1. DATA CONTROLLER**

For the recruitment purposes SSAB AB is the controller of personal data. SSAB is responsible for handling applicants' personal data in compliance with this Statement and applicable data protection laws.

In SSAB, the primary contact person for privacy matters in relation to recruitment is: Hanna Salovaara, Privacy officer within HR  
gdpr@ssab.com

### **2. LEGAL BASIS AND PURPOSE OF PROCESSING PERSONAL DATA**

SSAB processes personal data of job applicant for the following purposes, which are explained below.

#### **2.1 Recruitment**

SSAB processes personal data of job applicants in order to recruit new employees and to manage other administrative duties related to the recruitment process. The legal basis for the processing is primarily based on job applicant's consent. Job applicant may at any time revoke the consent. Note however, that revoking the consent may lead to cancellation of the recruitment process.

#### **2.2 Security**

SSAB uses access control and camera monitoring at SSAB's premises for the purposes of protecting SSAB's property, preventing unauthorized access to SSAB offices and production facilities and increasing SSAB personnel's and other persons' safety. SSAB bases this processing on SSAB's legitimate interest to ensure the safety of SSAB premises, employees, contractors and job applicants. SSAB does not use access control systems and camera monitoring to monitor the behaviour of individuals, and cameras are in no circumstances targeted at a particular individuals



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SSAB maintains information security measures (such as automated filtering of email and internet traffic, maintenance and retention of log data) for information security purposes to safeguard business information and business assets, to avoid criminal activities and ensure availability of the services. SSAB bases this processing on SSAB's legitimate interest to ensure network and information security and to safeguard SSAB's important business information and assets. The information security measures are not used for the purpose of monitoring of individuals.

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### **3. COLLECTION OF DATA**

#### **3.1 Necessary personal data collected for the recruitment purposes includes among others**

- Basic personal data, such as name, postal address, phone number, date of birth;
- log-in and password and other such information used in connection with the proper authentication
- Job application, CV, education background, examinations taken, skills profiles and other relevant qualification or certificate attached
- Aptitude and personality tests and security clearances, where applicable;
- Photograph when provided by the applicant or if applicant gives a consent to take a picture in connection to an interview
- preferred country/countries and/or sites of employment, willingness to relocate, desired salary
- References, which can be retrieved from previous employers. These contacts are provided by the applicant. In such case, the job applicant is responsible to obtain consent from the third party

As a rule, this personal data is collected directly from the job applicant. If SSAB uses an external service provided in recruitment process, personal data related to an employee's professional competence and qualification may be processed by that service provider. Subject to applicable national legislation, SSAB or its third party service providers may also collect personal data from public sources, and conduct background checks and assessments and store information from those during the recruitment process.

SSAB does not generally collect information about job applicants that is particularly personal or private (sensitive information). If sensitive information will be collected and processed at some stage of the recruitment process, such collection is based on the applicable local legislation, and the job applicant will be informed thereof, and consent will separately asked. SSAB is an equal opportunity employer and SSAB offers equal treatment to all job applicants.

#### **3.2 Necessary personal data for setting up an employment contract**

If recruitment leads to employment, SSAB needs to receive some additional personal information from the applicant. This information is directly collected from the individual in question.

### **4. SHARING OF PERSONAL DATA**

SSAB may disclose personal data to trusted third parties as part of SSAB's recruitment process

- when permitted or required by law, such as to tax authorities, social security authorities, insurance companies, pension institutions, occupational health care institutions, and trade unions and to occupational health and safety institutions and other equivalent authorities;

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- to trusted services providers, which act on SSAB's behalf and SSAB will control and be responsible for the use of personal data in connection to recruitment and employment
- if SSAB is involved in a merger, acquisition, or sale of all or a portion of its assets;
- when SSAB believes in good faith that disclosure is necessary to protect SSAB's rights, protect employees' safety or the safety of others, investigate fraud, or respond to a government request.

## **5. TRANSFER OF PERSONAL DATA OUTSIDE EU/EEA**

### **5.1 Intra-group transfers**

As some of the group companies are located outside of the EU/EEA, personal data in relation to the recruitment process may be transferred outside of EU/EEA, such as to the United States. SSAB's personnel may also have role-based access to personal data of job applicants from one of SSAB's group companies located outside the EU/EEA. In this case, these persons are required to access employees' personal data because of their work-related duties, and access to personal data is managed with limited access rights.

SSAB provides appropriate safeguard mechanisms for international data transfers as required by applicable data protection laws. For intra-group transfers, SSAB has ensured appropriate safeguards for the protection of personal data by using Standard Contractual Clauses as approved by the European Commission.

### **5.2 Trusted service providers located outside of EU/EEA**

SSAB's trusted service providers may process personal data outside of EU/EEA, as certain supporting resources and servers may locate in various countries. Thus your personal data may be transferred outside the country where you access and use the recruitment web site. To the extent personal data is transferred to a country outside of the EU/EEA, SSAB will use the required established mechanisms that allow the transfer to service providers in those thirds countries, such as the Standard Contractual Clauses approved by the European Commission or the Privacy Shield Principles.

## **6. RETENTION OF PERSONAL DATA**

Personal data related to non-chosen job applicants shall be retained for one year from the announcement of recruitment decision. If the recruitment process leads to an employment with SSAB, relevant Personal data will be retained during the course of the employment or as required by retention period provided in the applicable law.

## **7. PRIVACY RIGHTS**

Job applicants have a right to access and data portability of personal data SSAB holds about them. However, there may be some restrictions in this respect.

Job applicant may correct, update, change or remove their personal data at any time. However, please note that certain information is strictly necessary in order to fulfil the purposes defined in this Statement. Therefore, the deletion of such data may not be allowed under the applicable law, which prescribes mandatory retention periods.

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A request to delete personal data during a recruitment process means a suspension of the recruitment process.

Please send above-mentioned requests to SSAB at [gdpr@ssab.com](mailto:gdpr@ssab.com).

Job applicant has a right to file in a complaint to the national data protection authority in the EU/EEA.

## **8. SECURITY**

SSAB maintains reasonable security measures, including physical, electronic and procedural measures, to protect personal data from loss, destruction, misuse, and unauthorized access or disclosure. For example, SSAB limits the access to this information to authorized employees and contractors who need to know that information in the course of their job description and third party service providers who may only process data in accordance with SSAB provided instructions.

Please be aware that, although SSAB endeavours to provide reasonable security measures for personal data, no security system can prevent all potential security breaches.

## **9. CONTACT SSAB**

For requests regarding our Privacy Statement or personal data SSAB holds about the job applicant in question, please contact SSAB by email at [gdpr@ssab.com](mailto:gdpr@ssab.com).