

## DATA PRIVACY POLICY

### Introduction

Evraz plc and its affiliates (collectively, "**EVRAZ**") respect individual privacy and value the confidence of our associates, customers, vendors and others with whom we do business. EVRAZ strives to process Personally Identifiable Information ("**PII**," as defined below) in a manner consistent with the laws of the countries in which we do business, and we pride ourselves on upholding the highest ethical standards in our business practices.

This Data Privacy Policy (hereafter referred as the "**Policy**") sets forth the general privacy principles that EVRAZ follows with respect to PII that is processed in our business operations. In addition, there may be specific campaigns, promotions, programs and websites/applications developed in accordance with the principles and terms stated below and, if so required, governed by additional privacy terms or policies. EVRAZ encourages you to read these additional terms or policies before participating in or utilizing these campaigns, promotions, programs or websites/applications as the processing of your PII in this context will be governed by those additional privacy terms and/or policies.

#### This Policy consists of:

- this front section, which sets out the general principles applied by EVRAZ when processing PII; and
- an addendum for PII that (i) originates from or (ii) is processed in the EU, Iceland, Liechtenstein, Norway, and Switzerland (the "**EU Addendum**").

If you are located in (or if your PII is processed in) one of the above jurisdictions, EVRAZ encourages you to read the EU Addendum, which contains important additional information about the processing by EVRAZ of PII originating from or processed in those countries.

### SCOPE

This Policy applies to any and all forms of "processing" (as defined below) of PII in any format or medium, relating to (i) individuals who are customers, prospective customers, suppliers and prospective suppliers with whom EVRAZ does business; (ii) representatives or contact persons of such customers, suppliers, and prospective customers and suppliers and (iii) any other individuals about whom EVRAZ obtains PII.

The Policy does not apply to any information processed about legal entities as such.

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## DEFINITIONS

For purposes of this Policy, the following definitions shall apply:

**“European Economic Area”** or **“EEA”** means the Member States of the European Union plus Iceland, Liechtenstein, Norway, and Switzerland.

**“Personally Identifiable Information”** or **“PII”** means any information or set of information, whether alone or in combination with other Personally Identifiable Information, processed by EVRAZ, which is sufficient to identify an individual. Personally Identifiable Information does not include information that is anonymous, nor does it include publicly available information that has not been combined with non-public Personally Identifiable Information. For PII originating from or processed in the EEA, PII shall have the meaning given to it in the EU Addendum.

**“Processing”** shall mean any operation or set of operations that is performed upon PII or sets of PII, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction and the verb “to process” shall be construed accordingly.

As used in this Policy, **“EVRAZ”** means Evraz plc and its affiliates.

## PRIVACY PRINCIPLES


When processing PII, EVRAZ shall follow these principles:

### Notice and Consent

EVRAZ endeavors to inform persons whose PII EVRAZ collects, in accordance with applicable law. This includes providing information about (i) the purposes for which EVRAZ collects and uses the PII, (ii) the types of third parties to which EVRAZ discloses (or may disclose) that PII, and (iii) the choices and means EVRAZ offers the subjects of the PII for limiting the use and disclosure of their PII.

Unless otherwise required under applicable law, EVRAZ will endeavor to provide notice when persons are first asked to provide PII to EVRAZ, or as soon as practicable thereafter.

Unless permitted by applicable law, no PII is collected without first obtaining the consent of the individual for the collection, use and disclosure of that PII. In some circumstances the consent for EVRAZ to collect PII may arise from the nature of the relationship between EVRAZ and the individual, or an individual’s

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interaction with EVRAZ, such as by using a EVRAZ website/application or engaging in a transaction with EVRAZ.

When you provide PII to EVRAZ, you acknowledge that you have read this Policy and, where required under applicable law, consent to the collection, use and disclosure of your PII in accordance with this Policy and other applicable EVRAZ privacy policies. You may, as provided by applicable law, be free to refuse or withdraw your consent.

### **Choice**

Subject to any stricter requirements under applicable law, EVRAZ will endeavor to offer persons whose PII it possesses an opportunity, where feasible and reasonable under the circumstances, to choose whether their PII is to be (a) disclosed to a third party, or (b) used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. EVRAZ will endeavor to provide individuals with mechanisms, reasonable under the circumstances, to exercise their choices.

If your PII is originating from or processed in the EEA, please refer to the section “Your Rights” in the EU Addendum for an overview of your rights in this context.

### **Access and Correction**

Upon request and/or when required or otherwise appropriate, and within periods (if any) set by applicable law, EVRAZ will endeavor to grant individuals reasonable access to the PII that EVRAZ holds about them. Such access may be denied by EVRAZ where the denial is permitted by applicable law and every request from an individual will be assessed on a case by case basis. In the event a request is denied, EVRAZ will notify the individual regarding the reasons for denial in writing. Consistent with how your PII is maintained in the ordinary course of EVRAZ's business, EVRAZ will provide the information in an understandable form. We may impose a reasonable charge when a request is made (e.g., for photocopying or postage) to the extent permitted under applicable law. In addition, EVRAZ will endeavor to take reasonable steps to permit individuals to correct, amend, or delete PII that is demonstrated to be inaccurate or incomplete. To guard against fraudulent requests for access, EVRAZ may require sufficient information to allow it to confirm the identity of the individual making the request before granting access.

If your PII is originating from or processed in the EEA, please refer to the section “Your Rights” in the EU Addendum for an overview of your rights, including your right of access and correction.

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## Data Integrity

Subject to any stricter requirements under applicable law, EVRAZ will endeavor to use PII only in ways that are compatible with the purposes for which the PII was collected or in ways that are subsequently authorized by the individual. EVRAZ will endeavor to take reasonable steps to ensure that PII is relevant to its intended use, accurate, complete, and current.

## Disclosure and Transfer to Third Parties

EVRAZ is not in the business of selling PII to others, but may share your PII with subsidiaries or affiliates controlled by EVRAZ, and with third party service providers that perform services on EVRAZ's behalf.

For PII originating from or processed in the EEA, a list of the relevant categories of third-party recipients can be found in the EU Addendum (see section "Third-Party Recipients").

EVRAZ may buy or sell subsidiaries or business units. In these types of transactions, PII is generally one of the business assets that is transferred. That PII remains subject to the obligations stated in any pre-existing privacy policy. In the event that EVRAZ or substantially all of its assets are acquired, PII will be one of the transferred assets.


## Cross-Border Transfers Originating From the EEA

If your PII is originating from or processed in the EEA, please refer to the paragraphs "Legal Basis for the Processing" and "Transfers Outside the EEA" in the EU Addendum.

## Cross-Border Transfers Not Originating From the EEA

Because EVRAZ does business in many countries, PII collected by EVRAZ in one country may be processed in another country, the laws of which may provide different levels of protection from those in the country where the PII was first collected. PII gathered in one country may be subject to access by and disclosure to law enforcement agencies of jurisdictions other than the country where the PII was first collected. EVRAZ also may share PII with organizations and entities that perform services on its behalf, and these organizations and entities may be located in countries other than the country in which the PII was first collected.

EVRAZ will endeavor to obtain appropriate and reasonably enforceable assurances from third parties, including its subsidiaries and affiliates, to which it discloses or transfers PII that these third parties will safeguard PII in a manner consistent with this Policy. When EVRAZ becomes aware that a third party is

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using or disclosing PII in a manner contrary to this Policy, EVRAZ will endeavor to take reasonable steps to prevent or stop such use or disclosure. To the extent applicable law requires an individual's consent before disclosing PII to third parties, EVRAZ will endeavor to obtain the individual's consent prior to such transfer. There may be circumstances where EVRAZ is required to transfer PII without obtaining prior consent, including (i) where required by a court order; (ii) where EVRAZ believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, or safety or property of a person or group of persons; (iii) where it is necessary to establish or collect monies owing to EVRAZ or to complete a transaction with a third party; (iv) where it is necessary to permit EVRAZ to pursue available remedies or limit any damages we may sustain; or (v) where the information is public. When EVRAZ is obliged or permitted to disclose PII, EVRAZ will endeavor not to disclose more than is required. EVRAZ may also make disclosures permitted by additional EVRAZ privacy terms and/or policies.

### **Security**

EVRAZ takes reasonable and appropriate precautions to protect PII in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction, and to respond to the misuse, loss or unauthorized use of such PII.

### **Governance**

EVRAZ will regularly review compliance with this and other EVRAZ privacy policies. Except to the extent otherwise prohibited by applicable law, any EVRAZ employee, associate or contractor that EVRAZ determines is in violation of this Policy will be subject to appropriate disciplinary action up to and including termination of employment or engagement.

### **Dispute Resolution**

Any questions or concerns regarding the use or disclosure of PII should be directed to EVRAZ at the address given below. EVRAZ will investigate and attempt to resolve complaints and disputes regarding use and disclosure of PII in accordance with the principles contained in this Policy.

### **CHANGES TO THIS POLICY**

From time to time, EVRAZ may revise this Policy, in which case the date indicated at the beginning of this Policy will be updated.

### **CONTACT INFORMATION**

Questions or comments about this Policy should be submitted to the following person, by mail or e-mail:

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Data Protection Officer  
Phone: +352 2673 43 -1506  
E-mail: [DPO@evraz.com](mailto:DPO@evraz.com)

## **ADDENDUM FOR INDIVIDUALS LOCATED IN (OR WHOSE PII IS PROCESSED BY EVRAZ ENTITIES ESTABLISHED IN) THE EUROPEAN ECONOMIC AREA (“EU ADDENDUM”)**

This EU Addendum completes and supplements the front section of the Data Privacy Policy for PII originating from or processed in the EEA. In case of any contradictions between the front section of this Policy and the EU Addendum, the EU Addendum will have precedence.

The purpose of this EU Addendum is to provide the information required under the General Data Protection Regulation, applicable in the EEA as from May 25, 2018 (the "**GDPR**"), including:

- why and how the relevant EVRAZ entity collects, processes and stores your PII;
- what its role as “controller” of your PII involves; and
- what your rights and our obligations are in relation to this processing.

### **Definitions**

For the purposes of the EU Addendum, the following definitions shall apply:


“**Controller**” generally means the legal entity that determines the purposes (i.e. why) and the means (i.e. how) of the processing of PII under this Policy.

“**EVRAZ**” means the legal entity within the EEA identified as the Controller under the paragraph “Controller” of this EU Addendum.

“**Personally Identifiable Information**” or “**PII**” means any information that constitutes “personal data” under the GDPR, namely any information relating to an identified or identifiable natural person.

“**Processor**” means a natural or legal person that processes PII on behalf of the Controller. EVRAZ’s processors may be EVRAZ subsidiaries, affiliates or third-party suppliers and service providers. EVRAZ will conclude a data processing agreement with its Processors to ensure your PII is processed in accordance with the GDPR.

### **Controller**

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EVRAZ in the EEA is made up of different legal entities, i.e. Evraz plc and its affiliates. When we mention “EVRAZ”, “we,” “us,” or “our” in this addendum, we are referring to the relevant EVRAZ legal entity in the EEA that determines the purposes and means of processing your PII under this Policy. We will let you know which entity will be the Controller for your PII when we collect your PII.

### **Collection of PII**

Your PII may be collected whenever EVRAZ:

- interacts with individuals who are prospective and existing customers/suppliers;
- interacts with individuals who are representatives or contact persons of prospective and existing customers/suppliers that are legal entities (e.g. for the selling/ordering of products or for marketing related purposes); or
- interacts with individuals who are past, existing and prospective employees and directors of EVRAZ.


### **Categories of PII Collected**

We may collect:

- basic identification information, such as name, title, position, company name, email and/or postal address and the fixed and/or mobile phone number;
- administrative information (e.g. identity documents, birthdate, gender, language, etc.);
- numeric data (e.g. logs, IP address);
- biometric data (e.g. picture, sound, video);
- financial information (e.g. bank account details, credit card information, tax data, transactional data);
- any additional information you voluntarily provide, (e.g. by filling in a form or registering for an email newsletter).

This information may either be directly provided by the above individuals or provided by the legal entity for whom they work (e.g. if they are the contact person designated by their employer to manage the commercial relations with EVRAZ).

### **Consequences of a Refusal to Provide PII**

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You are not subject to any legal obligation to provide your PII to EVRAZ. However, access to and use of any goods or services provided by us may not be able to commence or continue if you do not provide such PII.


### **Purposes of the Processing**

EVRAZ, and Processors acting on its behalf, process the PII collected from you for a specific purpose and only process the PII that is relevant to achieve that purpose.

We process PII to:

- undertake sales and procurement activities relating to our products and services;
- market our products and services;
- administer our customers and suppliers (e.g. user registration, account opening, credit checks);
- manage and enhance the relationship with our customers and suppliers;
- supply our products and services to our customers (e.g. administering and tracking a purchase, payment, return, managing billing and invoicing; arranging for services);
- prepare and manage contracts with our customers and suppliers;
- improve our existing products and services (or those under development) by means of customer and non-customer surveys, statistics and tests, or requesting feedback on products and services;
- periodically send promotional emails about our products, special offers and information that the company for which you work may find interesting, using the email address provided by you or for you (if any);
- otherwise communicate with you through various channels, (e.g. by periodically sending you promotional emails about our products, including special offers and information);
- monitor activities at our facilities, including compliance with applicable policies as well as security, health and safety rules in place;
- manage and monitor our websites, IT resources, including infrastructure management & business continuity;
- manage our archiving and records;



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- preserve the company's economic interests;
  - reply to an official request from a public or judicial authority with the necessary authorisation; and
  - manage legal and regulatory requirements, defend our legal rights and prevent and detect crime, including regular compliance monitoring.


### **Legal Basis of the Processing**

We are not allowed to process PII if we do not have a valid legal ground. Therefore, we will only process PII if:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations (e.g. tax or accounting requirements);
- the processing is necessary for the legitimate interests of EVRAZ and does not unduly affect your interests or fundamental rights and freedoms. Please note that, when processing your PII on this basis, we seek to maintain a balance between our legitimate interests and your privacy.

Examples of such 'legitimate interests' are:

- to buy products and services from our suppliers or from potential suppliers;
- to offer our products and services to our customers or prospective customers;
- to benefit from cost-effective services (e.g. we may decide to use certain platforms offered by external suppliers to process data);
- to better manage and administer the relationships with the customers and their data;
- to improve the quality of services to the customers by taking into account their preferences in terms of means of communication (phone, e-mail, etc.) and frequency;

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- to measure the customers' interest in EVRAZ products and gain a better understanding of customer interaction with the marketing emails, including by performing statistical and other research and analysis of data with respect to the status of the emails (e.g. not delivered, delivered, opened);
  - to enable EVRAZ to offer advertising and offers tailored to its customers so that EVRAZ can market its products better;
  - to prevent fraud or criminal activity, misuses of our products or services, as well as the security of our IT systems, architecture and networks;
  - to sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case PII could form part of one of the assets we sell; and
  - to meet our corporate and social responsibility objectives.


### **Third-Party Recipients**

We may transfer PII to our employees (to the extent they need it to perform their tasks) and other EVRAZ affiliates. Such other companies will either act as another Controller (in which case you will be separately informed about this processing) or only process PII on behalf and upon request of the Controller (thereby acting as a Processor).

In addition, we may also transfer your PII to third party Processors that are not EVRAZ affiliates to complete the purposes listed above, to the extent they need it to carry out the instructions we have given to them.

Your PII may be disclosed to:

- EVRAZ's subcontractors, business partners and experts as well as external counsels, agents, auditors, banks and depositories;
- any third party to whom we assign or novate any of our rights or obligations under a relevant agreement;
- processors and subprocessors such as our IT service providers, cloud service providers and database providers;
- any national and/or international regulatory, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request; and

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- any central or local government department and other statutory or public bodies.

### **Transfers outside the European Economic Area**

The PII transferred within or outside EVRAZ may also be processed in a country outside the EEA.

EVRAZ shall not transfer any PII outside the EEA otherwise that:

- to countries which provide an adequate level of protection for personal data as decided by the European Commission or;
- to recipients under a suitable agreement which contains the legal requirements for such transfer.

You may request additional information in this respect and obtain a copy of the relevant safeguard we have put in place by exercising your rights as set out below (see section “Your Rights”).

### **PII Retention**

We will retain your PII for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.


The criteria we use to determine retention periods for PII include: the purposes for which the PII is collected, legal statutory limitation periods, retention periods imposed by law, applicable contractual requirements and relevant industry standards.

### **Your Rights**

You have a right of access to your PII as processed by EVRAZ under this Policy. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction thereof. EVRAZ will promptly correct any such information.

You also have the right to:

- request the erasure of your PII without undue delay;
- request the restriction of the processing of your PII;

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- withdraw your consent where EVRAZ obtained your consent to process PII (without this withdrawal affecting the lawfulness of processing prior to the withdrawal);
  - object to the processing of your PII for other purposes in certain cases where EVRAZ processes your PII on another legal basis than your consent;
  - file a complaint with the competent data protection authority;
  - request and receive information about processed PII and PII breaches, access to your PII;
  - obtain without undue delay the rectification of inaccurate PII.

EVRAZ will honour such requests, withdrawals or objections as required under the applicable data protection rules.

In addition, you also have the right to data portability. This is the right to obtain the PII you have provided to EVRAZ in a structured, commonly used and machine-readable format and request the transmission of such PII to you or a third party, without hindrance from EVRAZ and subject to your own confidentiality obligations.

To exercise the above rights, please send an email to [DPO@evraz.com](mailto:DPO@evraz.com).

If you have any questions or are not satisfied with how EVRAZ processes your PII, please let us know by sending an e-mail at [DPO@evraz.com](mailto:DPO@evraz.com) or a written and signed request to Evraz Group S.A., 13, avenue Monterey, L-2163 Luxembourg, Grand-Duchy of Luxembourg. We will examine your question or complaint and get back to you as soon as possible.