

BADGING ADDENDUM

1. Definitions

“**Agreement**” means the capex purchase contracts and/or industrial service purchase contracts executed on a Plant and that require the use of the Badging System.

“**ArcelorMittal**” means ArcelorMittal S.A. and/or ArcelorMittal subsidiaries.

“**Badging System**” means the automated access control system used by ArcelorMittal to grant entry access to Contractors, Business Partners and Data Subject to the concerned Plant(s) to execute the Agreement.

“**Basic Data**” means data such as name, surname, address, phone number, mobile phone number, fax number, e-mail address, car license plate

“**Business Partner(s)**” means an external third party (such as but not limited to: workers, employees, suppliers, service providers, freight forwarders, vendors, partners, subcontractors) is working for or otherwise related to the Contractor and who is a Data Subject and/or engages Data Subjects for the performance of the Agreement.

“**Contractor**” means the direct contractual partner of ArcelorMittal with regard to whose Agreement the Badging System applies.

“**Controller**” means the legal person which alone or jointly with others determines the purposes and means of the Processing of Personal Data.

“**Data Protection Laws**” means any applicable law regarding the Processing, privacy, and use of Personal Data including (i) any laws and regulations of the European Union, the European Economic Area and their member states including the Directive 2002/58/EC and the EU General Data Protection Regulation 2016/679 ("GDPR") in each case as implemented, amended, replaced or superseded from time to time; and (ii) to the extent applicable, the data protection or privacy laws of any other country;

“**Data Subject**” means any natural person whose Personal Data are processed in the context the execution of the Agreement.

“**Personal Data**” means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

“**Plant**” means the ArcelorMittal site for steel production including the primary processes and/or finishing processes and/or other downstream processes, and/or any related activities and to which the Badging System gives access in order to execute the Agreement.

“**Processing**” of Personal Data means any operation or set of operations which is performed upon Personal Data by or on behalf of ArcelorMittal, 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.

“**Site Presence Data**” means data that is processed on the basis of the Badging System and that concerns presence information of the Business Partner and/or Data Subject on the ArcelorMittal site(s).

“Special Categories of Personal Data” means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic and biometric data for the purpose of uniquely identifying a natural person and data concerning health or sex life and sexual orientation.

2. Privacy

Compliance with all applicable Data Protection Laws is of the utmost importance to ArcelorMittal and Contractor.

ArcelorMittal and Contractor commit to be organized, governed and operated in a manner which is compliant with the requirements of the Data Protection Laws.

ArcelorMittal and Contractor commit to implement appropriate technical and organizational measures in such a manner that the Processing will meet the requirements of the Data Protection Laws. ArcelorMittal refers in this respect to its existing privacy policies, procedures and notices published on the ArcelorMittal website:

<https://corporate.arcelormittal.com/investors/corporate-governance/our-policies>

Processing of Personal Data through the Badging System shall happen in accordance with the Privacy Notice, to be found on the information portal for Contractor, Business Partner and Data Subject and <https://industry.arcelormittal.com/803>, as well as in Appendix A attached to this Addendum.

3. Acceptance

Contractor expressly accepts the use of the Badging System for the purposes mentioned in Appendix A and confirms expressly its commitment to ensure that its Business Partners and all other relevant third parties will be made aware of and will comply with the content of the Badging Addendum and said Appendix A.

APPENDIX A

PRIVACY NOTICE IN CASE THE MAIN PROCESSING OF PERSONAL DATA HAPPENS VIA THE BADGING SYSTEM

1. Scope of this Privacy Notice

This privacy notice applies to all Processing of Personal Data of Contractors, Business Partners and other Data Subjects by or on behalf of ArcelorMittal in the framework of the execution of Agreement(s) by the Contractor on a Plant. In all other cases the ArcelorMittal standard data protection clauses and relevant privacy policies/procedures/notices shall be used instead of this Privacy Notice and relating contractual clauses.

Personal Data at ArcelorMittal is processed in compliance with applicable Data Protections Laws including the European Union General Data Protection Regulation (“GDPR”) and the ArcelorMittal Data Protection Policy and the ArcelorMittal Data Protection Procedure that is also the Group’s Binding Corporate Rules (“BCR”) available on the external website of ArcelorMittal:

<https://corporate.arcelormittal.com/investors/corporate-governance/our-policies>

2. Who is responsible for the processing of personal data?

The Controller responsible for the Processing of Personal Data is :

The ArcelorMittal entity that operates the Plant where the Agreement is being executed

The ArcelorMittal Data Protection Officer may be contacted via the aforementioned means or via the following e-mail address : DPO-Europe@arcelormittal.com.

3. Which data from which sources does ArcelorMittal process?

The performance of the business relationships and the execution of Agreements with our Contractors require the Processing of Personal Data of Contractor, Business Partners and Data Subjects through the Badging System.

These Personal Data are provided to ArcelorMittal by the Contractors, the Business Partners and/or the Data Subjects.

Relevant Personal Data are, in particular:

- Basic Data
- Site Presence Data

For the purposes of the Badging System, ArcelorMittal does not process Special Categories of Personal Data.

4. For which purposes and on which legal basis does ArcelorMittal process Personal Data

ArcelorMittal processes Personal Data in order to monitor and manage Health & Safety-, security- and procurement- performance and objectives relating to the Agreement as further explained and detailed hereunder.

The processing takes place on the following legal basis:

- ArcelorMittal may process Basic and Site Presence Data for compliance with legal obligations to which ArcelorMittal is subject; this processing is based on article 6 (1) c) of the GDPR. Legal obligations may in particular include the mandatory disclosure of Personal Data to authorities and/or inspection services, compliance with applicable security and/or Health and Safety Regulations, investigation of criminal offences, etc. The Badging System is aimed to provide ArcelorMittal with precise and real time information of the number and identity of Contractors, Business Partners and Data Subjects located in a specific area of the Plant. Such information is vital for Health and Safety risk prevention and/or mitigation. As a consequence, failure to comply with instructions from ArcelorMittal related to the use of the Badging System will automatically be considered a breach of ArcelorMittal's Health and Safety regulations and will entail the appropriate contractual penalties.
- To the extent necessary, ArcelorMittal processes Personal Data for the purposes of its legitimate interests or the legitimate interests of Contractor, Business Partner and Data subject on the basis of article 6 (1) f) of the GDPR. Legitimate interests of ArcelorMittal may include but are not limited to:
 - Group-wide Processing for internal administration of Personal Data of Contractors, Business Partners and Data Subjects;
 - Management of discrepancies with the Site Presence Data collected via the Badging System
 - Commercial optimizations, such as renegotiations of different types of contracts;
 - Establishment of or defense against legal claims;
 - Prevention of criminal offences;
 - Management and further development of our business operations including risk management;
 - Etc.

5. Is there an obligation to provide Personal Data?

The Processing of Basic and Site Presence Data is necessary for entering into and maintaining a business relationship with ArcelorMittal, unless specified otherwise before or at collection of these data. Since physical presence and consequently the use of the Badging System by Contractors, Business Partners and Data Subjects is necessary for completion of the relevant Agreements, ArcelorMittal is not able to enter into and maintain a business relationship with its Contractors, without the Processing of Personal Data.

6. Who has access to Personal Data?

Personal and Site Presence Data are generally processed within ArcelorMittal group. Depending on the categories of these data, only dedicated departments / organizational units are granted access to the Personal and Site Presence Data to the extent necessary for compliance with contractual and statutory obligations and to act in the legitimate interest of ArcelorMittal.

If necessary and to the extent permitted by law, ArcelorMittal transfers Personal and Site Presence Data to recipients outside of ArcelorMittal. Such external recipients may include:

- Affiliated companies within ArcelorMittal Group, to which ArcelorMittal may transfer Personal or Site Presence Data for internal administration;
- Service providers that – on the basis of separate agreements with ArcelorMittal – provide certain services (e.g. in the areas of IT services, logistics, print services, collection, consulting or sales/marketing) possibly including the processing of Personal Data, as well as approved sub-contractors of our service providers;

- Private or public bodies, to the extent that ArcelorMittal is obliged to transfer Personal Data or Site Presence Data on the basis of a legal obligation to which it is subject.

7. Are Personal Data transferred to countries outside the EU / the EEA?

If ArcelorMittal transfers Personal or Site Presence Data to recipients in third countries, ArcelorMittal applies appropriate safeguards to ensure the necessary level of data protection at the recipient or in the recipient's country.

Appropriate safeguards may, in particular, consist in an adequacy decision in case the European Commission has decided that the country ensures an adequate level of protection. Alternatively, ArcelorMittal may transfer Personal or Site Presence Data on the basis of the EU Standard Clauses or – in case of recipients in the US – the recipient's adherence to the "EU US Privacy Shield" principles.

ArcelorMittal provides additional information on the appropriate or suitable safeguards applied, upon request.

8. How long are Personal Data stored?

ArcelorMittal stores Personal and Site Presence Data as long as it has contractual or legal obligation or a legitimate interest in the retention of such data.

ArcelorMittal deletes Personal and Site Presence Data without action by the Contractor, Business Partner and/or Data Subject as soon as further retention of the Personal and Site Presence Data is no longer necessary for the purposes for which these data were collected or otherwise processed or if further retention is not permitted by law.

In general, Basic and Site Presence Data and the additional Personal Data collected in the course of the business relationship are stored at least until the end of the limitation period that relates to the respective business relationship and/or Agreement.

If Personal and Site Presence Data need to be stored to comply with a legal obligation, such data is retained until the end of the respective retention period. If Personal and Site Presence Data are only processed to comply with a statutory retention obligation, the access to such data is usually restricted so that the data are only accessible if needed for the purpose of the retention obligation.

9. Does ArcelorMittal use automated decision-making (including profiling)?

In the course of the business relationship ArcelorMittal generally does not use automated decision-making (including profiling) within the meaning of Article 22 GDPR. If ArcelorMittal applies such processes in the future, ArcelorMittal will inform its Contractors separately in accordance with the applicable statutory provisions. Contractors commit to inform their Business Partners and Data Subjects without undue delay in this case.

10. What are the rights of Data Subjects?

Each Data Subject may :

- Request access to his/her Personal Data, Article 15 GDPR;
- Request the rectification of incorrect Personal Data, Article 16 GDPR;
- Request the erasure of his/her Personal Data, Article 17 GDPR;
- Request the restriction of the processing of his/her Personal Data, Article 18 GDPR;
- Object to the Processing of his/her Personal Data in case the legal basis of Processing is the legitimate interest of ArcelorMittal. In such cases if ArcelorMittal cannot demonstrate compelling legitimate grounds for Processing, the Processing will cease, Article 21 GDPR;

- Exercise the right to data portability, Article 20 GDPR;

For additional information on data protection at ArcelorMittal and Data Subject access rights, ArcelorMittal refers to its Data Protection Policy and Procedure and the ArcelorMittal Data Subject Access Rights and Requests Procedure.

In addition, the Data Subject is entitled to lodge a complaint regarding the processing of Personal Data with the competent supervisory authority based on Article 77 of the GDPR.