



**COLUMBUS  
STAINLESS**  
— [Pty] Ltd —

## **DATA PRIVACY STATEMENT**

Columbus Stainless may process information about data subjects which constitutes “personal information”. Columbus Stainless considers the protection and privacy of all personal information a very important matter.

Columbus Stainless, as the custodian and processor of personal information, acts as the “responsible party” in terms of protection of personal information legislation. In this Data Privacy Statement, “we” or “us” refers to Columbus Stainless.

We invite you to carefully read this Data Privacy Statement, which sets out in which context we are processing personal information, and explains our obligations when doing so.

### **WHAT INFORMATION DO WE PROCESS ABOUT YOU?**

This information may either be directly provided by you, by our business partners (i.e. the legal entity for whom you work if you are a natural person), by third parties (e.g. recruitment agencies) or be obtained through trusted publicly available sources. To the extent necessary, you provide us with your consent to collect your personal information from such other persons. We collect various types of personal information about you, including:

- your general and identification information (e.g. name, registration number, first name, last name, gender, email and/or postal address, fixed and/or mobile phone number) etc ;
- your function (e.g. title, position, name of company);
- payment information (e.g. bank account details, VAT or other tax identification number);
- Columbus unique business partner ID and profile;
- your electronic identification data where required for the purpose of delivering products or services to our company (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies, logs, access and connection times, image recording or sound such as badge pictures, CCTV or voice recordings);
- information regarding your preferences including in terms of channels of communication and frequency;
- data you provide to us for example when you fill in forms or during events you attend, or when you answer questions in a survey;
- data which relates to our products and services; and

- information about the interactions you have with us, including potential future interactions.

If you intend to provide us with personal information about other persons (e.g. your colleagues or subsidiary company, service provider, customers etc), you must provide a copy of this Privacy Notice to the relevant person(s), directly or through their employer (if they are natural persons), and ensure that they provide consent to your sharing their personal information with us in terms of this Privacy Notice.

## **FOR WHICH PURPOSES DO WE USE YOUR PERSONAL INFORMATION AND WHY IS IT JUSTIFIED?**

### **Legal basis for the processing**

We will only process your personal information if permitted by law, including if:

- we have obtained your prior consent;
- the processing is necessary to carry out actions for the conclusion or performance of a contract to which you are a party ;
- the processing is necessary to comply with our legal or regulatory obligations;
- the processing protects your legitimate interest; and / or
- the processing is necessary for our legitimate interests or the legitimate interests of a third party to whom the personal information is supplied, and does not unduly affect your interests or fundamental rights and freedoms.

Please note that, when processing your personal information on this last basis, we always seek to maintain a balance between our legitimate interests and your privacy.

### **Purposes of the processing**

We always process your personal information for a specific purpose and only process the personal information which is relevant to achieve that purpose. In particular, we process your personal information for the following purposes:

- manage our relationship with you (e.g. through our databases);
- implement tasks in preparation of or to perform existing contracts;
- evidence transactions;
- provide you with adequate and updated information about our products;
- improve the quality of our services by adapting our offering to your specific needs;

- answer your requests and provide you with efficient support;
- manage our IT resources, including infrastructure management and business continuity;
- preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, tax and deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation);
- archiving and record keeping;
- billing and invoicing; and
- any other purposes imposed by law and authorities.

## **WHO HAS ACCESS TO YOUR PERSONAL INFORMATION AND TO WHOM IS IT TRANSFERRED?**

We will not sell, share, or otherwise transfer your personal information to third parties other than those indicated in this Privacy Notice.

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal information can be accessed by or transferred to the following categories or recipients:

- our personnel (including personnel, departments or other companies of the Acerinox group to which Columbus belongs) on a strictly need-to-know basis;
- our independent agents or brokers;
- our suppliers and services providers that provide services and products to us;
- our IT systems providers, cloud service providers, database providers and consultants;
- our business partners who offer products or services jointly with us;
- any third party to whom we assign, cede or novate any of our rights or obligations;
- our advisors and external lawyers; and
- any national and/or international regulatory, enforcement, public body or court where we are required to do so by applicable law or regulation or at their request.

The above third parties are contractually obliged to protect the confidentiality and security of your personal information, in compliance with applicable law.

We work with affiliates and other trusted partners and service providers located outside of your country of domicile. The personal information we collect from you may therefore also be

processed, accessed, stored in or transferred to a country outside South Africa, which may not offer a level of protection of personal information which is substantially similar to the protections as may be enjoyed in your country of domicile.

If we transfer your personal information to any third party we will do so in accordance with data protection laws applicable.

For intra-group transfers of personal information, the Acerinox Group has adopted Binding Corporate Rules, a system of principles, rules and tools, which accord with the data protection principles provided by applicable law, in an effort to ensure effective levels of data protection relating to transfers of personal information to other countries.

## **HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

We have implemented appropriate, reasonable technical and organisational measures to provide a level of security and confidentiality to your personal information. The purpose thereof is to protect it against accidental or unlawful destruction or alteration, loss, damage, unauthorized disclosure or access and against other unlawful forms of processing.

Moreover, when handling your personal information, we:

- only collect and process personal information which is adequate, relevant and not excessive, as required to meet the above purposes; and
- ensure that your personal information remains up to date and accurate.

For the latter, we may request you to confirm the personal information we hold about you. You are also invited to spontaneously inform us whenever there is a change in your personal circumstances so we can ensure your personal information is kept up-to-date.

## **HOW LONG DO WE STORE YOUR PERSONAL INFORMATION?**

We will only retain your personal information for as long as necessary to fulfill the purpose for which it was collected or to comply with legal or regulatory requirements. When this period expires, your personal information is removed from our systems.

## **WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**

You may exercise the following rights under the conditions and within the limits set forth in the law:

- the right to access your personal information as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to request the erasure of your personal information or the restriction thereof to specific categories of processing;
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal;
- the right to object, in whole or in part, to the processing of your personal information; and
- the right to request its portability where applicable.

You also have the right to file a complaint with the competent data protection authorities, in addition to your rights above.

#### **HOW WILL YOU BE INFORMED OF CHANGES TO OUR PRIVACY NOTICE?**

Any future changes or additions to the processing of your personal information as described in this Data Privacy Statement will be published on our internet website:

<https://columbusstainless.co.za/about/informationsecurity.html>

#### **HOW CAN YOU CONTACT US?**

If you wish to contact us regarding our use of your personal information or you wish to exercise your data privacy rights, please email us at [popi@columbus.co.za](mailto:popi@columbus.co.za).

For more information, or to log a data protection enquiry online, please visit on our website:

<https://columbusstainless.co.za/about/informationsecurity.html>