



Privacy Statement

UK

We are the 'Special Steel Group', which is a generic term to collectively describe our 6 main operational businesses, majority owned or controlled by the parent, Special Steel Co. Ltd, Bacon Lane, Sheffield, S9 3NH, England ("SSG").

Your interaction with us will be through one or more of our main operational businesses as follows:

Special Steels Ltd

Special Testing Ltd

STW (Non-Destructive) Ltd

Special Quality Alloys Ltd

Special Quality Alloys Inc.

Special Machined Products Ltd

Our 5 UK operational business above are registered on the Information Commissioner's Register.

A new E.U. data privacy law came into effect on the 25th May 2018. As a result, this document outlines our **privacy notice** which allows data to be processed under a number of grounds and for a number of purposes. It will be reviewed after the UK Data Protection Bill has been finalised.

Our aim is to protect your personal information and safeguard your privacy.

This document covers information we collect about you, whether via our websites:

www.specialsteelgroup.com

www.specialsteel.co.uk

www.specialtesting.co.uk

www.sqainc.net

www.specialqualityalloys.com

www.specialmachinedproducts.com

www.stwndt.co.uk

or through our various sales, technical, quality, production, accounting and administration offices, and our agents or otherwise. Please read it carefully to understand how your personal information will be treated.

We will be the “controller” of the personal information which you provide to us or which we collect from you.

1. Personal information that we collect

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity data – name, job title;
- Contact data – email address or telephone numbers, company, delivery and billing addresses and postcode;
- Transaction data – details of products/services you have purchased from us, including date and time of booking and spend in relation to that booking;
- Profile data - purchases or orders made by you, your product preferences, feedback and survey responses you give to us in person, preferences about the use of the services (including whether you are interested in certain services that we offer);
- Usage data – information about how you use our website, products and services;
- Technical data - internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
- Marketing and communications data – your preferences in receiving marketing from us and your communication preferences; and
- Payment information, terms of payment and adherence to terms, credit or debit card information and;
- any other personal information that you choose to provide to us when you complete our online contact forms or ‘New Account’ request forms or otherwise make contact with us.

We do not collect any special categories of personal data about you. This includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

2. How we use your personal information

We use your personal information as follows:

- to maintain our relationship with you whilst you are a customer;
- to process orders and provide agreed goods and services to you;
- for invoicing, processing payments, account set up and maintenance,

- to communicate with you, including to respond to information requests /enquiries submitted and/or to obtain your feedback on our products and services;
- for record keeping, statistical analysis and internal reporting and research purposes;
- to ensure data security and to provide you with access to secure areas of our Websites;
- to notify you about changes to our products and services;
- to decide on and notify you about price changes;
- to monitor the quality of our products and services;
- for logistical purposes, including to plan and log delivery routes;
- to investigate any complaint you make;
- to provide evidence in any dispute or anticipated dispute between you and us;
- to customise various aspects of our Websites to improve your experience;
- as we may otherwise consider necessary to support the operation of our Websites;
- to obtain credit references, credit checks and for debt collection, fraud detection and prevention and risk management purposes;
- to protect the rights, property, and/or safety of SSG, its personnel and others.

Marketing

We may send you direct marketing in relation to our own products and services by phone and post, as long as this is in line with any marketing preferences that you have provided to us.

We will only send you direct marketing in relation to our own products and services by email:

- where you have consented to this; or
- where you have not objected to this, and we are marketing similar products and services to those which were the subject of a previous sale or negotiations of a sale to you.

Your agreement to the use of your personal information for direct marketing purposes is optional and if you choose not to consent, your visit to and use of our Websites will not be affected.

You can choose to opt out of receiving direct marketing information from us at any time, through the 'Unsubscribe' link at the bottom of any SSG email you receive, or by contacting the respective Sales & Marketing department of the specific SSG operational business that sent you the information:

- by mail – Special Steel Group, Bacon Lane, Sheffield S9 3NH
- by email – dpo@specialsteelgroup.com

Recruitment

If you click on the “careers” button (or equivalent) on our Websites, you will be directed to our dedicated recruitment page and this will give you the relevant person you should contract and / or submit your application to.

In submitting a job application you should be aware we may store the information you provide us for up to a year after the application deadline. We will store your information and any materials related to your application, such as interview notes, for up to a year following your interview and application, or if you are successful and become a legal employee, they will become part of your personnel file.

We may contact you if other suitable vacancies arise using the information you have provided to us. You can change your mind and withdraw consent at any time.

We do use external recruitment partners to advertise positions and review uploaded C.V.'s.

If you apply via our partner, you should review and understand their Privacy Policy.

Our current partner is:

Totaljobs Group
Blue Fin
110 Southwark Street
London
SE1 0TA

www.totaljobsgroup.com

3. Automated decision making/profiling

Credit Checks

We use technology provided by the credit reference and insurance agencies Creditsafe and Atradius (“CRAs”) that processes personal information that you provide to us, in order to analyse your creditworthiness, which helps us to decide if we are able to offer you an account, through which you can purchase products and services from SSG, by phone, online, or e-mail using one of our sales offices or agents. We will also continue to exchange information about you with the CRAs on an on-going basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share this information with other organisations, which may use it to make decisions on future applications for credit.

Both Creditsafe and Atradius provides further information about how it uses and shares personal information that it receives about you and/or your business on their respective Websites.

If you pass our credit checks, and our other account opening criteria (details of which will be made available to you during the account opening process) you will be entitled to open an account with us and order any of our products and services in accordance with our General Conditions of Sale. If you do not pass our credit checks you will not be able to set up a credit account but you may still be

entitled to order our products or services (in accordance with our General Conditions of Sale) at our discretion, by making payment upfront.

Third Party Advertising Partners

We sometimes use third party advertising partners for a variety of marketing services which may include but are not limited to:

- LinkedIn. You can find more information about how your personal data may be used in connection with LinkedIn's advertising and options for opting out here: <https://www.linkedin.com/legal/privacy-policy>
- Google. You can find out more about how your personal information may be used in connection with Google's advertising functions and options for opting out here: www.google.co.uk/intl/en/policies/technologies/ads

4. Legal basis for processing

In terms of the legal bases we rely on to process your personal information, these are as follows:

- where you have provided your consent: for direct marketing communications in respect of our own products and services, including in respect of marketing communications sent by electronic means (e.g. email);
- for the performance of a contract with you (such as a contract for the provision of goods and services) or to take steps at your request prior to entering into this contract;
- to comply with legal obligations, including in relation to health and safety and environmental legislation, performing anti- money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation;
- to protect your vital interests or the vital interests of another person, e.g. where you or they are seriously injured or ill, or
- for our legitimate interests in:

Management of your account (including processing payments) and our relationship with you, and communicating with you; operating our Websites; sending direct marketing in respect of our own products and services where you have not provided your consent and the marketing communication is sent by non-electronic means (e.g. post or telephone); processing orders and supplying our products and services; and our internal business purposes which may include:

Processing for the purposes of; record keeping, research, reporting and statistics, data security, to ensure the quality of our products and services, investigating and responding to queries and complaints, obtaining credit references and credit checks, providing payment performance data to credit reference agencies, changing our pricing, debt collection, fraud detection and prevention, risk management, recruitment and training of our personnel, and protecting our rights, property and

safety (and that of others). You can object to processing carried out on the basis of our legitimate interests at any time by emailing dpo@specialsteelgroup.com

See also “Your Rights – The right to object”.

5. How we share your personal information

When we use your personal information for the purposes specified above, we may also share it with other companies in the Special Steel Group, other than the immediate SSG company you have contacted or contracted with, for reporting purposes and otherwise in accordance with this Privacy Statement.

In addition, we may share your personal information with:

- Third party provider(s) who provide the following types of services to us: marketing, market research, warehousing and logistics, software, recruitment and customer relationship management;
- Third party providers in order for us to process payments that are due to us, in doing so we provide bank card details to such providers;
- Third party service providers and agents we appoint as our sales agents or to perform services on our behalf, who are provided with access to certain SSG customer account details in order to process sales or provide services on our behalf:
- Third party advertising partners, such as Google in order for them to assist us in providing Website usage data;
- Licensed credit reference agencies, debt collection agencies and lawyers when we carry out credit checks, to report on your payment performance and/or or seek to recover debts due to us;
- Our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;
- Emergency services in the event that we need to report accidents or incidents or request emergency assistance;
- any Government Department, public body or other third party where we believe in good faith that the law requires this; in the interests of public health and safety; or in order to protect the rights, property or safety of SSG, its employees or others;
- Investors and other relevant third parties in in the event of an actual or potential sale or other corporate transaction related to the SSG;
- any other third parties, if authorised by you to do so.

The performance of services by our third party service provider(s) may be subject to a separate privacy statement provided to you by the relevant third party. You should read any such statement carefully.

6. How long we keep your personal information

We retain your personal information for no longer than is necessary for the purposes for which the personal information is collected. When determining the relevant retention periods, we will take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes, and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

7. Cookies

Where you use our Websites, we will process your personal information collected by using cookies.

A 'cookie' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <https://www.aboutcookies.org>

8. Links to third party websites

Our Websites may contain links to other Internet websites. Unless otherwise explicitly stated, we are not responsible for the privacy practices or the content of such websites, including such sites' use of any personal information. Nevertheless, in the event you encounter any third party associated with our Websites (or who claims association with our Websites) who you feel is improperly collecting or using information about you, please contact dpo@specialsteelgroup.com; we will be happy to forward your message to the third party.

9. Security

We use industry standard security methods to protect the personal information that we may hold and process on our servers.

However, please note that whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide to us, no transmission over the Internet can be guaranteed to be secure.

Consequently, please note that we cannot guarantee the security of any personal information that you transfer to us over the Internet.

10. Your rights

The following section explains your rights. The various rights are not absolute and each is subject to certain exceptions or qualifications.

We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws. Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under data protection laws.

1. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights. This is why we're providing you with the information in this Privacy Statement.

2. The right of access

You have the right to obtain a copy of your personal information (if we're processing it), and other certain information (similar to that provided in this Privacy Statement) about how it is used.

This is so you're aware and can check that we're using your personal information in accordance with data protection law.

We can refuse to provide information where to do so may reveal personal information about another person or would otherwise negatively impact another person's rights.

3. The right to rectification

You can ask us to take reasonable measures to correct your personal information if it's inaccurate or incomplete e.g. if we have the wrong name or address for you.

4. The right to erasure

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal information where there's no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure; there are exceptions, e.g. where we need to use the information in defence of a legal claim.

5. The right to restrict processing

You have rights to 'block' or suppress further use of your personal information when we are assessing a request for rectification or as an alternative to erasure.

When processing is restricted, we can still store your personal information, but may not use it further. We keep lists of people who have asked for further use of their personal information to be 'blocked' to make sure the restriction is respected in future.

6. The right to data portability

You have rights to obtain and reuse certain personal information for your own purposes across different organisations. This enables you to move, copy or transfer your personal information easily between our IT systems and theirs (or directly to yourself) safely and securely, without affecting its usability. This only applies to your personal information that you have provided to us that we are processing with your consent or to perform a contract which you are a party to (such as pay and compensation services), which is being processed by automated means.

7. The right to object

You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time insofar as that processing takes place for the purposes of legitimate interests pursued by SSG or by a third party. We will be allowed to continue to process the personal information if we can demonstrate “compelling legitimate grounds for the processing which override [your] interests, rights and freedoms” or we need this for the establishment, exercise or defence of legal claims.

8. Rights in relation to automated decision making and profiling

You have the right not to be subject to a decision based solely on automated processing (including profiling), which significantly affects you, subject to some exceptions.

Where this is the case, you have the right to obtain human intervention, voice your concerns and to have the decision reviewed.

9. Updating this statement

We may make changes to this Privacy Policy. When we make these changes we will publish the updated policy on our Website.

10. Contact us

For further information regarding these rights, about this Privacy Statement generally or to make a complaint please contact our Data Protection Officer at dpo@specialsteelgroup.com

Please provide as much information as possible to help us identify the information you are requesting, the action you are wanting us to take and why you believe this action should be taken.

Special Steel Group
Bacon Lane
Sheffield S9 3NH United Kingdom,

Before assessing your request, we may request additional information in order to identify you. If you do not provide the requested information and, as a result we are not in a position to identify you, we may refuse to action your request.

We will generally respond to your request within one month of receipt of your request. We can extend this period by an additional two months if this is necessary taking into account the complexity and number of requests that you have submitted.

We will not charge you for such communications or actions we take, unless:

- you request additional copies of your personal data undergoing processing, in which case we may charge for our reasonable administrative costs, or
- you submit manifestly unfounded or excessive requests, in particular because of their repetitive character, in which case we may either: (a) charge for our reasonable administrative costs; or (b) refuse to act on the request.

If after contacting SSG you are still unhappy you may also complain to the Information Commissioner, all contact details are available on the Information Commissioner's Website:

<https://ico.org.uk>.