

## Privacy policy for our social media channels

We, Kloeckner Metals UK (hereinafter also "Kloeckner", "we" or "us"), take the protection of personal data and its confidential treatment very seriously. We therefore hereby inform you about the processing of your personal data and the rights to which you are entitled when you visit our online presence on social media channels.

When you visit our profiles, your personal data is collected, used and stored not only by us, but also by the operators of the respective social network. This happens even if you yourself do not have a profile on the respective social network. The individual data processing operations and their scope differ depending on the operator of the respective social network and they are not necessarily traceable for us.

The information in this data protection information relates to the processing of your personal data in connection with your visit to our online presence, insofar as this is carried out by us.

### 1. Responsible entity

The responsible entity in the sense of data protection law is

Kloeckner Metals UK  
Valley Farm Road  
Stourton  
Leeds  
LS10 1SD  
[KMUK.dataprotection@kloeckner.com](mailto:KMUK.dataprotection@kloeckner.com)

For the data processing on the listed social media platforms, we and subsequent operators are jointly responsible in the sense of Art. 26 GDPR:

- **Facebook:** joint controller is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. You can view the privacy policy for Facebook at <https://www.facebook.com/about/privacy>.
- **LinkedIn:** joint controller and (for some functions) processor is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. You can view the privacy policy for LinkedIn at <https://www.linkedin.com/legal/privacy-policy? l>.

### 2. Recipients or categories of recipients

Internally, only those departments and employees working there who need access to your personal data to fulfill the purposes stated here have access to it.

Externally, the following recipients/categories of recipients have access to your data:

- Data Processors that we use to provide services.

- Public bodies: Authorities and state institutions, such as public prosecutors' offices, courts or tax authorities, to which we may transfer personal data in individual cases if and to the extent that there is a legal basis for this in the individual case, in particular an obligation.
- Operators of the social media platforms used:
  - **Instagram:** independent controller is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. You can view the privacy policy for Instagram at <https://help.instagram.com/155833707900388>.
  - **Twitter:** independent controller and (for some functions) processor is Twitter Inc, 1355 Market Street, Suite 900, San Francisco, CA 94103 USA (for persons living outside the European Union, EFTA countries, or the United Kingdom), or Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland (for persons living within the European Union, EFTA countries, or the United Kingdom). You can view the privacy policy for Twitter at <https://twitter.com/en/privacy>.
  - **YouTube:** independent controller and (for some functions) processor is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. You can view the privacy policy for YouTube at [https://www.gstatic.com/policies/privacy/pdf/20190122/f3294e95/google\\_privacy\\_policy\\_en\\_eu.pdf](https://www.gstatic.com/policies/privacy/pdf/20190122/f3294e95/google_privacy_policy_en_eu.pdf).
  - **LinkedIn:** joint controller and (for some functions) processor or own controller is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. You can view the privacy policy for LinkedIn at [https://www.linkedin.com/legal/privacy-policy? l](https://www.linkedin.com/legal/privacy-policy?l).
  - **Facebook:** joint controller is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. You can view the privacy policy for Facebook at <https://www.facebook.com/about/privacy>.

You can contact the data protection officers of the respective social media providers at:

- **Facebook and Instagram:** Meta Platforms Ireland Limited, Attn: Data Protection Officer, 4 Grand Canal Square, Dublin 2, Ireland, or at the link: <https://www.facebook.com/help/contact/540977946302970>.
- **Twitter:** Twitter International Unlimited Company, Attn: Data Protection Officer, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland, or at the link: [https://twitter.ethicspointvp.com/custom/twitter/forms/data/form\\_data.asp](https://twitter.ethicspointvp.com/custom/twitter/forms/data/form_data.asp).
- **YouTube:** Google Ireland Limited, Gordon House, Attn: Data Protection Officer, Barrow Street, Dublin 4, Ireland, or at the link: <https://support.google.com/policies/answer/9581826?hl>.
- **LinkedIn:** LinkedIn Ireland Unlimited Company, Attn: Data Protection Officer, Wilton Place, Dublin 2, Ireland, or at the link: <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>.

### 3. Contacting and interactions

We process your personal data when you contact us via our online presence by using the functions provided for this purpose (e.g. by creating your own posts, responding to one of our posts or by sending us private messages) or by retrieving the content provided by us (e.g. videos, images).

If you contact us in this way, we process your personal data that is directly visible in this process (usually: username, profile picture, message content, date and time of interaction; For applicants,

additionally the information contained in the resume, such as work experience, education, etc.) to respond to your contact. We also process personal data from you for external presentation as well as for information about and optimization of our products, services and projects.

The legal basis for the processing is Art. 6 para. 1 lit. f) GDPR. The legitimate interest pursued by us lies in contacting (potential) applicants, customers and interested parties, external presentation as well as informing you about and optimizing our products, services and projects.

The legal basis for the processing of your personal data is Art. 6 para. 1 lit. b) GDPR, insofar as your contact is made for the purpose of concluding or executing a contract with us.

We ask you to refrain from providing us with special categories of personal data or similarly sensitive categories of personal data when contacting us.

The data you enter in the contact request will remain with us until you request us to delete it, revoke your consent to store it, or the purpose for storing the data no longer applies ( e.g. after we have completed processing your request). Mandatory legal provisions - in particular retention periods - remain unaffected.

#### **4. Information about the processing of your personal data at the respective social media platform**

##### **a. Facebook Page**

We operate this page as a communication and information channel to inform about our offers. Personal data is processed in accordance with Art. 6 (1) f) GDPR on the basis of our legitimate interest in the use of this contemporary information and interaction opportunity with users and visitors to the site.

We would like to point out that you use this Facebook page and its functions on your own responsibility. This applies in particular to the use of the interactive functions (e.g. commenting, sharing, rating).

Statistical data of various categories can be accessed by us via the so-called "Insights" of the Facebook page. These statistics are generated and provided by Facebook. As the operator of the page, we have no influence on the generation and presentation. We cannot turn off this function or prevent the generation and processing of the data. For a selectable period of time and for the categories fans, subscribers, reached persons and interacting persons, the following data is provided to us by Facebook in relation to our Facebook page:

- Total number of page views and activities, post interactions ("likes", comments, shared content, clicks on links, etc.), (post) reach, video views, replies,
- Gender distribution,
- Origin related to country and city,
- Language,
- Views and clicks in the store,
- Clicks on route planners,
- Clicks on telephone numbers.

Data on the Facebook groups linked to our Facebook page is also provided in this way. Due to the constant development of Facebook, the availability and processing of the data changes, so that we refer to the aforementioned privacy policy of Facebook for further details. We use this data, available in aggregated form, to make our posts and activities on our Facebook page more attractive to users. For example, we use the distributions by age and gender for an adapted address and the preferred visiting times of the users for a time-optimized planning of our posts. Information about the type of end devices used by visitors helps us to adapt the visual design of the posts accordingly. In accordance with the Facebook Terms of Use, which each user has agreed to as part of creating a Facebook profile, we can identify subscribers and fans of the site and view their profiles and other shared information from them.

### **Essence of joint responsibility agreement**

The agreements with Meta on joint responsibility essentially state that requests for information and the assertion of other data subject rights should be asserted directly with Meta. As the provider of the social network and the possibility to integrate Facebook pages there, Meta alone has direct access to the necessary information and can also take any necessary measures and provide information immediately. However, should our support be required, we can be contacted at any time.

In addition, Meta has provided us, as the page operator of the Kloeckner Facebook page, with contractual terms and conditions, which can be accessed via the following link:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

### **User Rights:**

Meta assumes, under the shared responsibility agreement entered into between us and Meta, primary responsibility under the GDPR for the processing of Insights Data and complies with all obligations under the GDPR with respect to the processing of Insights Data (including, without limitation, Articles 12 and 13 of the GDPR, Articles 15 to 22 of the GDPR, and Articles 32 to 34 of the GDPR). In addition, Meta will make the essence of this Site Insights Supplement available to data subjects.

You are welcome to contact both us and Meta with any questions. Under the agreement that exists between us and Meta, to the extent that Meta alone is required to comply with your data subject rights, we will promptly forward your request to Meta. Meta will respond to inquiries in accordance with our obligations under this Site Insights Supplement.

### **b. Instagram Page**

We operate this page as a communication and information channel to inform about our offers. We do not collect any data ourselves via your Instagram account. However, the data you enter on Instagram, in particular your username and the content published under your account, are processed by us to the extent that we respond to or comment on them. The data freely published and disseminated by you on Instagram can thus be included by us in our offer and made available to our followers. Personal data is processed pursuant to Art. 6 (1) lit. f) GDPR on the basis of our legitimate interest in the use of this contemporary information and interaction opportunity with users and visitors of the site.

We would like to point out that you use this Instagram page and its functions on your own responsibility. This applies in particular to the use of the interactive functions (for example, commenting or rating).

The privacy policy is available at the following link: <https://help.instagram.com/519522125107875>.

In what way Instagram uses the data from the visit for its own purposes, to what extent activities on the Instagram page are assigned to individual users, how long Instagram stores this data and whether data from a visit to the Instagram page is passed on to third parties, is not conclusively and clearly stated by Instagram and is not known to us.

### **c. Twitter Page**

We operate this site as a communication and information channel to inform about our offers. We do not collect any data ourselves via your Twitter account. However, the data you enter on Twitter, in particular your username and the content published under your account, will be processed by us insofar as we may re-tweet your tweets or reply to them, or also compose tweets from us that refer to your account. The data freely published and disseminated by you on Twitter can thus be included by us in our offer and made accessible to our followers. Personal data is processed in accordance with Art. 6 (1) f) GDPR on the basis of our legitimate interest in using this contemporary information and interaction opportunity with users and visitors to the site.

We would like to point out that you use the Twitter short messaging service offered here and its functions on your own responsibility. This applies in particular to the use of the interactive functions (for example, sharing or rating). Information about what data is processed by Twitter and for what purposes can be found in Twitter's privacy policy: <https://twitter.com/en/privacy>.

We have no influence on the type and scope of the data processed by Twitter, the type of processing and use or the transfer of this data to third parties. We also have no effective control options in this respect.

### **d. YouTube Channel**

We operate this site as a communication and information channel to inform about our offers. We process your data when you communicate with us via YouTube. By analyzing the views and interactions on our YouTube page, we obtain statistics. The generated visitor statistics are transmitted to us exclusively in anonymized form. We have no access to the underlying data in each case. Through this information collected by YouTube, demographic and geographic evaluations are also created and made available to us. All of this information allows companies to better understand what users are interested in, to better interact with their audience, or to better advertise. However, the data you enter on YouTube, in particular your username and the content published under your account, are processed by us to the extent that we respond to your comments and your publications under "Discussions" if necessary. The data freely published and disseminated by you on YouTube can thus be included by us in our offer and made available to our followers. Personal data is processed pursuant to Art. 6 (1) f) GDPR on the basis of our legitimate interest in the use of this contemporary information and interaction opportunity with users and visitors to the site.

We would like to point out that you use the YouTube channel offered here and its functions on your own responsibility. This applies in particular to the use of the "Discussion" function. Information on

what data is processed by Google and for what purposes can be found in Google's privacy policy:

<https://policies.google.com/privacy?hl=en&gl=uk#infocollect>.

You have options to restrict the processing of your data in the general settings of your Google account. In addition to these tools, Google also offers specific privacy settings on YouTube. You can learn more about this in Google's guide to privacy in Google products:

<https://policies.google.com/technologies/product-privacy?hl=en-GB>.

For more information on these points, see Google's privacy policy under the term "Privacy Settings":

<https://policies.google.com/privacy?hl=en-GB&gl=de#infochoices>.

#### **e. LinkedIn Page**

We operate this site as a communication and information channel to inform about our offers. We process your data when you communicate with us via LinkedIn. By analyzing the calls and interactions on our LinkedIn page, we obtain usage profiles and statistics. The visitor statistics created are transmitted to us exclusively in anonymized form. We do not have access to the underlying data in each case. Through this information collected by LinkedIn, demographic and geographic evaluations are also created and made available to us. Based on all this information, companies can better understand which posts interest users in order to better interact with their target group or to be able to serve better advertising. Personal data is processed in accordance with Art. 6 (1) f) GDPR on the basis of our legitimate interest in the use of this timely information and interaction with users and visitors to the site.

There is thereby partly a processing of personal data in joint responsibility with LinkedIn (this is the case for the use of the Insights page). LinkedIn provides more detailed information on joint responsibility and processing here: <https://legal.linkedin.com/pages-joint-controller-addendum>.

In addition, processing of personal data is also carried out by LinkedIn Ireland Unlimited Company as a processor (for the use of the Talent/Hiring, LinkedIn Learning, Glint/Engage, Sales and Marketing Solutions features). LinkedIn provides more detailed information on order processing here: <https://www.linkedin.com/legal/l/dpa>.

In connection with your visit to our online presence, LinkedIn may also process personal data beyond this. In this case, the processing is carried out under the sole responsibility of LinkedIn and without our knowledge. You can find more information about this at:

<https://www.linkedin.com/legal/privacy-policy>.

We would like to point out that you use this LinkedIn page and its functions on your own responsibility. This applies in particular to the use of interactive features (for example, when you post a comment, click a like button, share a post, send us a message, access the page, or engage in any other possible interaction on our LinkedIn page).

We have no influence on the type and scope of the data processed by LinkedIn, the way it is processed and used, or the transfer of this data to third parties. We also have no effective control options in this respect. With the use of LinkedIn, your personal data is collected, transmitted, stored, disclosed and used by LinkedIn.

#### **Essence of joint responsibility agreement**

From the agreements with LinkedIn also on joint responsibility, it essentially follows that requests for information and the assertion of other data subject rights are sensibly asserted directly with LinkedIn. This is because as the provider of the social network and the possibility of including LinkedIn pages there, LinkedIn alone has direct access to the necessary information and can also take any necessary measures and provide information immediately. However, if our support is required, we can be contacted at any time.

#### **5. Processing outside of the European Union**

In principle, we only process your personal data in Germany and in the European Union.

The respective social media providers described here process and possibly transfer your data to countries outside the European Union. What information they receive and how it is used is described by the respective social media providers in their privacy statements, which are linked at the beginning of this privacy policy.

#### **6. Sources of personal data in case of third party collection**

We only process personal data that we collect directly from you.

#### **7. Automated decision making**

We do not use automated decision making including profiling according to Art. 22 GDPR.

#### **8. Data subject rights**

As a person affected by the processing of personal data, you have the following rights:

- To request confirmation as to whether we are processing personal data relating to you; if this is the case, you have the right to information on this processing.
- To request the correction of inaccurate personal data concerning you and the completion of incomplete personal data concerning you.
- Under the conditions of Art. 17 GDPR, to request the erasure of personal data concerning you, including if the processing was carried out unlawfully or is no longer necessary.
- Under the conditions of Art. 18 GDPR, to request restriction of the processing of personal data concerning you, inter alia, in lieu of erasure of the data.
- To receive personal data concerning you that you have provided in a structured, common and machine-readable format or to transfer it to another controller, provided that the processing is carried out with the aid of automated procedures and is based on your consent or a contract with you (data portability).
- To revoke any consent given to us to process your personal data at any time with effect for the future (revocation of consent). The lawfulness of the processing of your data until the revocation remains unaffected.

**You can contact us at any time to assert your data subject rights. To do so, please use our contact details listed under section 1.**

If you believe that the processing of your personal data violates data protection law, you may also file a complaint with a supervisory authority, in particular in the EU member state or federal state of your habitual residence, place of work or the place of the alleged violation you are complaining about.

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