

**PRIVACY POLICY
WORLD STEEL ASSOCIATION
(full version)**

Effective since: 30 May 2018

1. General warning

1.1

The World Steel Association AISBL, (hereinafter, '**worldsteel**') respects the privacy of its users (hereinafter, the '**users**')

1.2

worldsteel processes the personal data transmitted to it in accordance with the legislation in force, and, in particular, Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data, applicable from 25 May 2018 (hereinafter, the "**General Data Protection Regulation**").

1.3

Access to the worldsteel [websites](#) (hereinafter, the '**websites**') implies the user's full and unreserved acceptance of this Privacy policy (hereinafter the 'Policy'), as well as its terms of use (hereinafter, the '[Terms of use](#)') and the cookie policy (hereinafter, the '[Cookie policy](#)').

1.4

The user acknowledges having read the information below and authorizes worldsteel to process, in accordance with the provisions of the Policy, the personal data that he/she communicates on the websites as part of the services made available by worldsteel on its websites (hereinafter, the '[Services](#)').

1.5

The policy is valid for all pages hosted on the websites and for the registrations of these websites. It is not valid for the pages hosted by third parties to which worldsteel may refer and whose privacy policies may differ. worldsteel cannot therefore be held responsible for any data processed on these websites or by them.

2. Data Controller

2.1

Simply visiting the websites shall take place without having to provide any personal data, such as first name, surname, postal address, e-mail address, etc.

2.2

As part of the Services, the user may be required to provide certain personal data. In this case, the data controller is:

AISBL World Steel Association
Avenue de Tervueren 270
1150 Brussels
Belgium
VAT Number BE 0406.597.373

2.3

Any question regarding the processing of this data may be sent to the following address:
privacy@worldsteel.org.

3. Data collected

3.1

By completing an order form on the websites and using the Services, the user allows, in particular, worldsteel to record and store, for the purposes mentioned in point 4, the following information:

- Identifying data such as the first name and surname, marital status, e-mail address, date of birth and delivery address;
- The banking information necessary for the Services, such as bank account numbers, IBAN and BIC/SWIFT;
- Invoicing information
- Communications between the User and worldsteel

3.2

The user also authorizes worldsteel to record and store the following data for the purposes mentioned in point 4:

- Information voluntarily provided by the user for a purpose specified in the Policy, the Terms of use, the Cookie policy, on the websites or on any other medium of communication used by worldsteel;
- Additional information requested by worldsteel to the user in order to identify him or to prevent him from violating any of the provisions of the Policy.

3.3

In order to facilitate browsing the websites as well as to optimize technical management, the websites use 'cookies'. These 'cookies' record, in particular:

- The user's browsing preferences;
- The date and time of access to the websites and other data related to traffic;
- The pages visited.

All information relating to "cookies" is included in the Cookie policy.

3.4

When the user accesses the websites, the servers consulted automatically record certain data, such as:

- The type of domain with which the user connects to the Internet;
- The IP address assigned to the user (when connected);
- The date and time of access to the websites and other data related to traffic;
- Location data or other data relating to the communication;
- The page visited;
- The type of browser used;

- The platform and/or operating system used;
- The search engine as well as the keywords used to find the websites.

3.5

No nominative data identifying the user is collected through the cookies and servers consulted. This information is kept for statistical purposes only and to improve the websites.

4. Purposes of processing the data

4.1

We process your data for various purposes. For each purpose, only the data relevant to the pursuit of the purpose in question are processed. The processing consists of any operation (manual or automated) on personal data. worldsteel collects, stores and uses its User's data for the following purposes, in particular:

- To establish, carry out and conduct the contractual relationship with the user;
- To analyze, adapt and improve the content of the websites;
- To provide the Services;
- To allow the user to receive messages;
- To facilitate the availability and use of the websites;
- To personalize the user's experience on the websites;
- To respond to requests for information;
- To inform them about any changes on the websites and its features;
- For any other purpose to which the User expressly consented

4.2

The legal basis of the processing of your personal data is based on:

- Your consent;
- The execution of any request from you. We do need to collect some of your data to answer any request from you. If you choose not to share this data with us, it may render the performance of the contract impossible;
- A legal obligation imposed on the Controller. We do need to collect and store some of your data to meet various legal requirements, including tax and accounting;
- The protection of vital interests;
- For the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller, or
- Our legitimate interest, provided that it is in accordance with your interests, freedoms and fundamental rights.

We have a legitimate interest in providing you with this information and interacting with you, especially to respond to your requests or improve our services, prevent abuse and fraud, control the regularity of our operations, exercise, defend and preserve our rights, for example, in litigation, as well as evidence of a possible violation of our rights, manage and improve our relations with you, continually improve our website and our services, unless such interests are supplanted by your interests or your fundamental rights and freedoms requiring the protection of your personal data. We take care in any case to maintain a proportionate balance between our legitimate interest and respect for your privacy.

If the legal basis of our treatment is your consent, you have the right to withdraw it at any time without prejudice to the lawfulness of the processing performed prior to withdrawal.

This means that you can unsubscribe at any time from newsletters. You will be put in "opt-out". You can unsubscribe by sending us an email at the following address privacy@worldsteel.org. or by clicking on the unsubscribe link at the bottom of each newsletter.

5. Rights of the Data Subject

5.1

According to the regulations on the processing of personal data, the user has the following rights:

- **Right to be informed** about the purposes of the processing (see above) and the identity of the data controller.
- **Right of access:** The user may, at any time, have access to the data that worldsteel has on him or check if he is included in the database of worldsteel.
- **Right to rectification:** we take all reasonable steps to ensure that the data we hold is up to date. We encourage you from time to time to access your account (if applicable) or to consult us to check that your data is up to date. If you find that your data is inaccurate or incomplete, you have the right to ask us to correct it.
- **Right to object:** The user may, at any time, object to the use of his data by worldsteel
- **Right to erasure:** The user may, at any time request the deletion of his personal data, except those which worldsteel has a legal obligation to keep on record.
- **Right of limitation of processing:** the user may, in particular, obtain a limitation of processing when he has objected to the processing, when he disputes the accuracy of the data, or when he considers that the processing is illegal.
- **Right of portability:** The user has the right to receive the personal data that he has communicated to worldsteel and may also ask said company to send this data to another data controller.

5.2

In order to exercise his rights, the user sends a written request, accompanied by a copy of his identity card or his passport, to the data controller:

- By e-mail: privacy@worldsteel.org
- By mail: World Steel Association, Avenue de Tervueren 270 - 1150 Brussels - Belgium

5.3

worldsteel will then take the necessary steps to satisfy this request as soon as possible and in any case within one month of receipt of the application. If necessary, this period can be extended by two months, given the complexity and the number of requests.

6. Periode of storage

6.1

worldsteel will keep the personal data of its users for the duration necessary to achieve the objectives pursued (see point 4).

6.2

worldsteel may also continue to keep personal data concerning the de-registered user, including all correspondence or request for assistance sent to worldsteel in order to be in a position to reply to all questions or complaints that may be sent to it after the service, and in order to comply with all applicable laws, namely in tax matters or as part of other legal requirements.

7. Complaint with the supervisory authority

The user is informed that he has the right to lodge a complaint with the Data Protection Authority:

Data Protection Authority
Rue de la Presse, 35

1000 – Brussels
Tel : +32 (0)2 274 48 00

8. Security

8.1

In order to guarantee optimal payment security, worldsteel uses the online payment service 'Ingenico', which meets high security standards.

8.2

In addition, worldsteel has taken the appropriate organizational and technical measures to ensure a level of security adapted to the risk and that, to the extent possible, the servers hosting the personal data processed prevent:

- Unauthorized access to or modification of this data;
- Improper use or disclosure of such data;
- Unlawful destruction or accidental loss of such data.

8.3

In this respect, employees of worldsteel who have access to this data are subject to a strict confidentiality obligation. Nevertheless, worldsteel may in no way be held liable in the event that this data is stolen or hijacked by a third party despite the security measures adopted.

8.4

Users undertake not to commit acts that may be contrary to this Policy, the Terms of use, the Cookie policy or, in general, the law. Violations of confidentiality, integrity and availability of information systems and data which are stored, processed or transmitted by these systems, or the attempt to commit one of these violations, shall be punishable by imprisonment of between three months and five years and a fine of between twenty-six euros and two hundred thousand euros, or one of these penalties only.

9. Communications to third parties

9.1

worldsteel treats personal data as confidential information. It will not communicate them to third parties under any condition other than those specified in the Policy, such as to achieve the objectives set out and defined in point 4, or under the conditions in which the law requires it to do so.

9.2

worldsteel may communicate its users' personal information to third parties to the extent that such information is necessary for the performance of a contract with its users. In such case, these third parties will not communicate this information to other third parties, except in one of the two following situations:

- The communication of this information by such third parties to their suppliers or subcontractors to the extent necessary for the performance of the contract;
- Where such third parties are obliged by the regulations in force to communicate certain information or documents to the competent authorities in the field of combating money laundering, as well as, in general to any competent public authorities.

9.3

The communication of this information to the aforementioned persons shall, in all circumstances, be limited to what is strictly necessary or required by the applicable regulations.

10. Transfer to a country outside of the European Economic Area

worldsteel transfers data to a country outside the European Economic Area only when that country ensures an adequate level of protection within the meaning of the legislation in force, and in particular, within the meaning of the General Data Protection Regulation (for more information on the countries offering an adequate level of protection, see: <https://goo.gl/1eWt1V>), or within the limits permitted by the legislation in force, for example by ensuring the protection of data by appropriate contractual provisions.

The information processed by worldsteel could be transferred or transmitted, or stored and processed in other countries other than the country in which you live, for the purposes described in this Policy. These data transfers are necessary to provide the services or processing set forth in the Policy, and to operate and provide you with our Services worldwide. We use standard contractual clauses approved by the European Commission and we rely on the European Commission's adequacy decisions concerning certain countries, where appropriate, for data transfers from the European Economic Area to other countries. If you have any question in this regard, do not hesitate to contact us at the following address privacy@worldsteel.org

11. Payment services

11.1

The payment services integrated into our websites are provided by 'Stripe' for steeluniversity; and by 'Ingenico' for our other worldsteel websites.

11.2

The relationship between the user and 'Stripe' or 'Ingenico' is governed by the Privacy policy available at the following addresses:

- [Stripe](#)
- [Ingenico](#)

These also include provisions relating to the processing of personal data sent to 'Stripe' or 'Ingenico' as part of its service, and for which 'Stripe' or 'Ingenico' are the data controller.

11.3

When making a payment through worldsteel, the user declares that he/she has read, understood and accepted the privacy policy of 'Stripe' and/or of 'Ingenico'.

12. Note concerning minors

Persons under the age of 18 and persons who do not have full legal capacity are not permitted to use these websites. worldsteel asks them not to provide their personal data.

Any infringement found in this provision must be reported without delay to the following address: privacy@worldsteel.org

13. Updates and changes to the Policy

By informing users through the websites or email, worldsteel may modify and adapt the Policy, in particular to comply with any new legislation and/or regulations applicable (such as the General Data Protection Regulation applicable from 25 May 2018), the recommendations of the Belgian Privacy Commission, the guidelines, recommendations and best practices of the European Data Protection Board and the decisions of the courts and tribunals on this issue.

14. Validity of the contractual clauses

14.1

Failure by worldsteel to invoke, at any time given, a provision of this Policy, may not be interpreted as a waiver to subsequently make use of its rights under the said provision.

14.2

The invalidity, expiration or the unenforceable nature of all or part of one of the above or below mentioned provisions shall not give rise to the invalidity of all the Policy. Any fully or partially invalid, lapsed or unenforceable provision shall be deemed not to have been written. worldsteel undertakes to substitute this provision with another which, to the extent possible, fulfils the same objective.

15. Applicable law and competent court

15.1

The validity, interpretation and/or implementation of the Policy are subject to Belgian law, to the extent permitted by the provisions of applicable private international law.

15.2

In the event of a dispute relating to the validity, interpretation or implementation of the Policy, the courts and tribunals of Brussels have exclusive jurisdiction, to the extent permitted by the provisions of applicable private international law.

15.3

Before taking any step towards the judicial resolution of a dispute, the user and worldsteel undertake to attempt to resolve it amicably. To this end, they shall first contact each other before resorting, where appropriate, to mediation, arbitration, or any other alternative method of dispute resolution.