

DATA PROTECTION POLICY

The Board of Directors of Barna Steel, S.A., on behalf of the entire Celsa Group ('**Celsa Group**'), in the context of its general and non-delegable power to determine the general policies and strategies of Celsa Group, has approved this *Personal Data Protection Policy* (the '**Policy**').

I. Purpose

Celsa Group has the express desire to be respectful of the fundamental right to the protection of personal data of each and every one of its professionals, suppliers and customers, so it has arranged to implement the regulatory, technical and organisational measures that allow proper processing of personal data.

The purpose of this Policy is twofold: on the one hand, to establish the fundamental principles and obligations regarding the protection of personal data for the companies and professionals that make up the Celsa Group and, on the other hand, to establish the guidelines to guarantee the privacy of the data of clients, suppliers, professionals, etc.

This Policy complements the specific internal regulations relating to data protection.

II. Scope

This Policy applies to Celsa Group and all group companies, taking into account their specific characteristics. Celsa Group will work to ensure that the policies of its Group companies are in line with this Policy.

In the case of activities performed by Celsa Group outside Spain, this Policy will be adapted to the more restrictive local legislation applicable.

III. General principles

For data to be processed, Celsa Group, in accordance with EU and Spanish legislation, is setting out the principles in this Policy that determine the basic conditions under which personal data may be processed:

a) Principle of lawfulness, fairness and transparency of processing:

For the processing of personal data to be considered lawful, it must have a legitimate basis. The data must be processed fairly and transparently vis-à-vis the data subject. In this sense, on the one hand, data may not be collected fraudulently or unlawfully; and, on the other hand, this obligation of transparency also manifests itself as the obligation to inform the data subject of the processing.

b) Purpose limitation principle:

Personal data must be collected for a specified, explicit and legitimate purpose, allowing the data subject to control the use to which the data will be put. Any processing for historical, statistical or scientific purposes, and in any case for archiving purposes in the public interest, is always considered to be compatible with the purpose for which the personal data are collected, although in these cases the principle of data minimisation or the use of a pseudonymisation technique must be observed.

c) Principle of minimisation:

Data should be processed only to the extent strictly necessary for the purpose for which they are processed. The data must be adequate, relevant and not excessive in relation to the purpose for which they are processed.

d) Principle of accuracy:

The data must be accurate and up to date.

e) Data storage period:

Personal data must be erased when they are no longer necessary or relevant for the purpose for which they were collected. They may be kept longer, subject to appropriate security measures, if they are intended to be kept exclusively for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

f) Principles of transparency and information:

The processing of personal data must be transparent in relation to the data subject, providing them with information on the processing of their data in an understandable and accessible manner. Data subjects or subjects whose data are intended to be collected must be informed of the circumstances relating to the processing in accordance with the applicable legislation.

g) Principle of integrity and confidentiality:

Data processing must guarantee its security by preventing unauthorised or unlawful processing by applying appropriate technical or organisational measures. Anyone who processes personal data is subject to a duty of confidentiality of the information processed.

h) Principle of active responsibility:

The Controller must comply with all the principles of personal data processing.

i) Acquisition or collection of personal data:

The acquisition or collection of personal data from illegitimate sources is strictly prohibited, as well as from sources that do not sufficiently guarantee their legitimate origin or from sources whose data have been collected or transferred in contravention of the law.

j) International data transfers:

Any transfer of data outside the European Economic Area must be carried out in strict compliance with the requirements set out in the applicable law in the jurisdiction of origin, provided that personal data processing is subject to European Union law.

k) Data subjects' rights:

Celsa Group will ensure that data subjects may exercise their rights of access, rectification, erasure, limitation of processing, portability and objection, establishing, for this purpose, the necessary internal procedures to satisfy the legal requirements applicable in each case.

These General Principles are supplemented by the specific internal regulations that develop them and that are created according to the needs of each Celsa Group company in this area.

IV. Objectives

Celsa Group states and formalises in this Policy its absolute respect for the privacy and integrity of individuals and its rejection of the violation of the principles relating to the protection of personal data included in the previous section, assuming the following objectives:

- To comply with the applicable legal and regulatory obligations and requirements, and to follow international standards and good practices in data protection.
- To ensure that neither Celsa Group nor its professionals collect, process, store, disclose or use personal data in a manner contrary to the law.
- To respect the right to privacy of individuals, protecting the personal data entrusted to it by both its professionals (processing, under the legally established terms, their personal data and, in particular, medical or financial data) and by third parties related to Celsa Group, whether customers, suppliers, institutions or the general public.
- To maintain and update protocols that demonstrate the application of privacy by design and by default.
- To design mechanisms for supervision and continuous improvement based on auditing and control of correct compliance with data protection obligations.

V. Actions

To achieve compliance with the above commitments and obligations, Celsa Group has adopted the following measures:

- Maintaining internal regulations adapted to the data processing carried out in Celsa Group, in accordance with the applicable regulations.
- Keeping a Data Protection Officer responsible for data protection.
- Informing, training, and making our professionals aware of the importance of complying with this legislation.

- Extending this Policy and its content to the business processes of all areas, to guarantee the security and confidentiality of all information.

VI. Privacy governance system

Celsa Group has appointed a Data Protection Officer (DPO) for the Group, to facilitate compliance with its legal obligations in this area and to demonstrate Celsa Group's commitment beyond strict compliance with current legislation.

The essential functions of the DPO are to advise and inform Celsa Group on the processing of personal data, as well as to be the point of reference for all the Group's Business Units and to collaborate with the supervisory authorities. The following methods of contact have been established:

- Email: GDPR@gcelsa.com
- Postal address: CELSA Group™, FAO: Data Protection Officer. C/Ferralla n. 12, 08755 Castellbisbal, Barcelona, Spain.

This postal address has been set up as a contact point for all companies that operate under the Celsa Group name and are publicised in data protection communications.

This Data Protection Policy was updated by the Board of Directors of Barna Steel, S.A., representing the entire Celsa Group, on 2023, July 13th.