**PRIVACY NOTICE FOR BUSINESS PARTNERS IN ACCORDANCE WITH U.S. LAW**

Each of NIPPON STEEL CORPORATION, its Head Office located at 6-1, Marunouchi 2-chome, Chiyoda-ku, Tokyo 100-8071, Japan, and its group companies (together “NSC”) provides information on the processing of personal data in connection with its relationship with existing and potential customers, trading companies, end users, goods and service suppliers, agents, advisors, outside auditors, research institutions, industrial organizations and other persons with whom NSC or any of its group companies maintain or is considering to create a business relationship (each a “Business Partner”) to the extent U.S. law applies. This Privacy Notice also applies to users of NSC’s website (nipponsteel.com).

If a Business Partner who is an individual or a Business Partner Contact (as defined below) is a California “consumer” within the meaning of the California Consumer Privacy Act of 2018 (“CCPA”), the “**ADDENDUM FOR CALIFORNIA CONSUMERS**” below applies to them.

NSC may process the following personal data:

* Profile and contact information, such as full name, signature, work position, work experience, work address, work telephone number, work mobile phone number, work fax number, work e-mail address, physical characteristics or description, work position, health information or dietary restrictions and preferences of a Business Partner who is an individual, or a person working for or on behalf of a Business Partner (each shall be referred to as a “Business Partner Contact”);
* Further information processed in connection with the relationship between NSC and a Business Partner or provided by a Business Partner Contact.
* Information NSC or third parties it authorizes collect from users that navigate its website, such as web logs, web beacons, IP addresses, cookies, pixels, and other information related to how a user interacts with NSC’s website.

NSC processes the personal data indicated above for the following purposes:

* Communicating with Business Partner Contacts about products and services of NSC, e.g. by responding to inquiries or requests, entering into or executing transactions for products or services, providing technical support;
* Communicating with Business Partner Contacts about the products and services of Business Partners;
* Planning, performing and managing the business relationship with Business Partners;
* Improving its websites;
* Solving disputes, enforcing agreements and/or to establish, exercise or defend legal claims;
* Complying with applicable laws and regulations, including cooperating with relevant authorities and regulators.

For the purposes of processing indicated above, NSC may disclose personal data to the following recipients or categories of recipients:

* Directors, supervisory board members, senior advisors, advisors, executive officers, fellows, executive counsellors, employees (including employees undergoing their probationary employment period), temporary employees, and any persons who correspond to such positions (“Staff”) of NSC;
* External advisors such as attorneys, accountants and tax advisors (“Advisors”) of NSC;
* Group companies of NSC and their Staff and Advisors with whom NSC needs to share the data;
* Other Business Partners and their Staff and Advisors with whom NSC needs to share the data;
* Governmental agencies, boards, commissions, officers, officials or entities exercising legislative, judicial, regulatory or administrative functions.

For NSC’s website, NSC partners with certain third-party service providers to collect information about how website users interact with its website to engage in analytics, auditing, research, and reporting.  These third parties may use server logs, web beacons, tags, pixels, and similar technologies, and they may set and access cookies on a user’s computer or other device.

In particular, NSC uses Google Analytics to help us understand how customers use its website. Website users can read more about how Google uses Personal Information [here](https://www.google.com/intl/en/policies/privacy/) or opt out of the use of cookies in web browsers by Google Analytics by clicking [here](https://tools.google.com/dlpage/gaoptout). NSC’s website does not respond to Do Not Track signals at this time.

NSC does not knowingly collect personal information from minors under the age of 16.

Unless indicated otherwise, NSC will retain personal data for as long as is necessary for the purpose for which they were collected or otherwise processed (including as required by applicable law or regulation or for the exercise or defense of legal claims).

If a Business Partner Contact has a question with regard to processing of his/her personal data, he/she may contact NSC at: privacy\_infous.nipponsteel.com

NSC may modify this Privacy Notice from time to time. NSC will inform of any substantial changes to this Privacy Notice by posting the amended notice on the website of NIPPON STEEL CORPORATION.

This amended privacy notice is effective as of January 1, 2020.

**ADDENDUM FOR BUSINESS PARTNERS WHO ARE CALIFORNIA CONSUMERS**

Date last updated: January 1, 2020

This Addendum for Business Partners Who Are California Consumers (this “Addendum”) intends to inform Business Partners and Business Partner Contacts who are California residents (collectively, “you” or “your”) about how NSC collects and uses your Personal Information (as defined below) under the CCPA and what your rights and NSC’s obligations are in relation to the processing of your Personal Information in accordance with the CCPA. This Addendum supplements the “**PRIVACY NOTICE FOR BUSINESS PARTNERS IN ACCORDANCE WITH U.S. LAW**” above (“Privacy Notice”) and prevails over any conflicting provisions in the Privacy Notice. Capitalized terms used but not otherwise defined herein have the meanings ascribed thereto in the Privacy Notice.
For the purpose of this Addendum, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

**1. Categories and Purposes of Collected Personal Information**

The following is a list of categories of Personal Information as listed in the CCPA which NSC has collected within the preceding 12 months, and the business or commercial purposes for which such Personal Information was collected:

|  |  |
| --- | --- |
| Personal Information Collected | Business/Commercial Purposes |
| A. Identifiers, such as full name, signature, work address, work telephone number, work mobile phone number, work fax number or work e-mail address of a Business Partner Contact | Communicating with Business Partner Contacts |
| B. Personal information, as defined in the [California customer records law](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=1798.80.&lawCode=CIV), such as full name, signature, work position, work experience, work address, work telephone number, work mobile phone number, work fax number, work e-mail address or physical characteristics or description | Communicating with and building relationships with Business Partner Contacts |
| C. Characteristics of protected classifications under California or federal law, such as health information  | Communicating with and building relationships with Business Partner Contacts |
| D. Internet or network activity information, such as web logs, web beacons, IP addresses, cookies and pixels | Conducting analytics for the purpose of improving NSC’s website |
| E. Professional or employment-related information, such as work position, work experience or dietary restrictions and preferences | Communicating with and building relationships with Business Partner Contacts |
| Inferences drawn from any Personal Information listed above to create a profile or summary about you; for example, your individual preferences and characteristics, such as your dietary preferences, medical conditions, and information about your religion | To arrange proper accommodations with Business Partners and Business Partner Contacts |

**2. Sources of Personal Information**

For each of these categories, NSC collects Personal Information from

I. The Business Partner or Business Partner Contact

* Identifiers
* Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
* [Characteristics of protected classifications under California or federal law](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=1798.80.&lawCode=CIV)
* Professional or employment-related information

II. Group companies (affiliates and subsidiaries) of NSC

* Identifiers
* Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
* Characteristics of protected classifications under California or federal law
* Professional or employment-related information

**3. Disclosure of Personal Information**

NSC has disclosed the following categories of Personal Information as listed in the CCPA to third parties for NSC’s operational business purposes within the preceding 12 months:

* Identifiers, such as full name, work address, and work email
* Personal information, as defined in the California customer records law, such as full name, work position, work address, work telephone number, work mobile phone number, and work fax number
* Inferences drawn from any Personal Information listed above to create a profile or summary about you

NSC has disclosed these categories of Personal Information to

* Advisors of NSC, group companies of NSC and their Staff and Advisors
* Other Business Partners and their Staff and Advisors
* governmental agencies, boards, commissions, officers, officials or entities exercising legislative, judicial, regulatory or administrative functions
* Third-party service providers that assist us with improving our website

We have not sold your personal information over the past 12, as “sale” is defined in the CCPA. We also do not knowingly collect, disclose, use, or sell personal information of minors under the age of 16.

**4. Your Rights and Requests**

Under the CCPA, you may:

1. Request that NSC disclose to you the following information that it has collected, used or disclosed over the past 12 months:
	1. The categories of Personal Information NSC has collected about you;
	2. The categories of sources from which NSC has collected such Personal Information;
	3. The business or commercial purpose(s) for collecting such Personal Information;
	4. The categories of third parties with whom NSC shares such Personal Information; and
	5. The specific pieces of Personal Information NSC has collected about you; and
2. Request to delete Personal Information NSC has collected from or about you.

NSC will not discriminate against you for exercising any of your rights under the CCPA.

To make a request for the disclosure or deletion described above, please contact NIPPON STEEL NORTH AMERICA, INC. (“NSNA”), NSC’s affiliate located in the United States, by using the following means:

* Calling the following toll-free number: +1 844 202 2755
* Sending an e-mail message to the following e-mail address: privacy\_infous.nipponsteel.com

Upon receiving a request from you, NSC will first verify your identity by requiring to submit your name, email address, phone number and other information we require to verify your identity and by matching the information you provide with what NSC already has on file.

If you wish to use an authorized agent to submit a request to know or a request to delete, you may do so by providing NSNA with a written document that is signed by both you and the agent that allows the agent to submit a request on your behalf (including a power of attorney).

**5.** **Contact NSC**

If you have any questions or concerns regarding this Addendum or NSC’s privacy practices, please contact NSC at:

NIPPON STEEL NORTH AMERICA, INC.

1251 Avenue of the Americas, Suite 2320, New York, NY 10020, U.S.A.

+1 844 202 2755

privacy\_infous.nipponsteel.com