

P0L006

Policy

Internal Audit &Compliance

Rev.	Date	Modification	Prepared by	Supervised by
1	19/07/2018	Initial Version of the Document Daniel Lluch Compliance Commit		Compliance Committee
2	25/09/2019	Updating of perimeter, brand and committee components	Daniel Lluch	Compliance Committee
3	31/08/2020			Compliance Committee

Content

1.	OBJETIVE	2
2.	SCOPE	2
3.	TERMS AND DEFINITIONS	2
4.	REFERENCE DOCUMENTS	2
4.1	Basic Reference Standars	2
5.	MAIN ESTABLISHMENT	2
6.	GOVERMENT FRAMEWORK	3
5.1	The Privacy Committee	4
5.2	Privacy Officer	4
6.3	Privacy Manager	
5.4	Head Unit / Processing Managers	5
6.5	RACI Matrix	
	UPDATING AND REVISION OF THE MANAGEMENT MODEL	
8.	LANGUAGE	7
9.	APPROVAL AND ENTRY INTO FORCE	7
10.	ANNEX	8
10.1	Perimeter	8
10.2	2 Main Establishment	.10
10.5	Privacy Committee	. 11
10.4	Privacy Officer	. 11
10.5	5 Privacy Managers	.11



POL006

Policy

Internal Audit &Compliance

1. OBJETIVE

The purpose of this document is to establish the Privacy Management Model at Gonvarri Industries (hereinafter, GI) in order to comply with the requirements established by the GDPR and the different regulatory developments applicable in each of the countries of the European Union where GI operates.

2. SCOPE

The GI Privacy Management Model is applicable to all fully or partially automated processing of personal data, as well as to non-automated processing of personal data contained in or intended to be included in a file.

Likewise, this Privacy Management Model applies to the processing of personal data in the context of the activities of a GI establishment in the European Union, regardless of whether the processing takes place in the European Union or not.

The Annex to this document details the list of companies in the European Union within the perimeter of Gl activity.

3. TERMS AND DEFINITIONS

The following definitions apply:

- Personal data: any information about an identified or identifiable natural person. An identifiable
 natural person is any person whose identity can be established, directly or indirectly, in particular by
 means of an identifier, such as a name, an identification number, location data, an online identifier or
 one or more elements of that person's physical, physiological, genetic, psychological, economic, cultural
 or social identitu.
- Processing: any operation or set of operations carried out on personal data or sets of personal data,
 whether or not by automated means, such as collection, recording, organisation, structuring, storage,
 adaptation or modification, extraction, consultation, use, communication by transmission,
 dissemination or any other form of enabling access, collation or interconnection, limitation, erasure or
 destruction.
- **File**: any structured set of personal data, accessible according to specific criteria, whether centralised, decentralised or distributed on a functional or geographical basis.

4. REFERENCE DOCUMENTS

4.1 Basic Reference Standars

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016
 on the protection of individuals with regard to the processing of personal data and on the free
 movement of such data and repealing Directive 95/46/EC (hereinafter referred to as the General Data
 Protection Regulation GDPR).
- The different local laws applied in each member country of the European Union as a complement to the RGPD

5. MAIN ESTABLISHMENT

GI, as Data Controller and/or Data Processor with establishments in more than one Member State of the European Union, must establish a Principal Establishment.





P0L006
Policy
Internal Audit &Compliance

- Data controller: the natural or legal person who, alone or together with others, determines the purposes and means of processing.
- Processor: the natural or legal person who processes personal data on behalf of the controller.

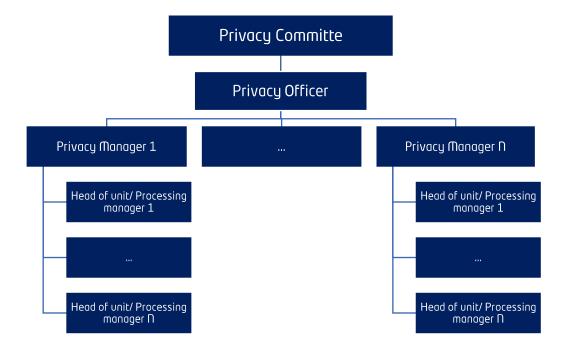
In this context, the establishment where decisions on the purposes and means of the processing of personal data are made has been designated as the main establishment of GI, with the power to enforce such decisions on the other establishments that make up GI.

Details of the establishment are given in the Annex.

6. GOVERMENT FRAMEWORK

With a view to managing privacy within GI, a Governance Framework has been established consisting of the following bodies, figures and roles:

- **Privacy Committee,** made up of the following people: IT, Legal, HR and Compliance.
- Privacy Officer, who reports functionally to the Privacy Committee.
- Privacy manager, at the factory or facility level, who reports functionally to the Privacy Officer.
- **Head of units responsible** for the processing of factories or installations.



It should be noted that GI does not require the formal appointment of a Data Protection Officer (DPO) since the criteria set out in Article 37(1) of the GDPR do not apply. In particular, the following:

- a) No processing carried out by a public authority or body have been identified.
- b) No processing requiring routine and systematic large-scale observation have been identified.



POL006

Policy

Internal Audit &Compliance

c) No large-scale processing of special categories of personal data (art. 9) or of convictions and criminal offences (art. 10) has been identified.

6.1 The Privacy Committee

The Privacy Committee is the highest privacy reporting unit and is made up of the Privacy Officers of: IT, Legal, HR and Compliance.

The main functions of the Privacy Committee are:

- Approval and Revision of the Privacy Policy.
- Decision-making in particular situations, among which are:
 - High risk security incidents.
 - Exercise of the exceptional rights of the data subject.
 - Use of high-risk Processing.
- Appoint the Privacy Officer.

6.2 Privacy Officer

GI appoints a Privacy Officer under the following **premises:**

- GI will ensure that the Privacy Officer is involved in an appropriate and timely manner in all matters relating to the protection of personal data.
- GI will support the Privacy Officer in the performance of his or her duties by providing the necessary resources for the performance of those duties and for access to personal data and processing operations and for the maintenance of his or her expertise.
- GI will ensure that the Privacy Officer does not receive any instructions regarding the performance of his or her duties. He shall not be dismissed or punished for carrying out his duties.
- The Privacy Officer will report functionally to the Privacy Committee.
- The interested parties may contact the Privacy Officer regarding all questions relating to the processing of their personal data and the exercise of their rights under the RGPD and the various local regulatory developments (for example the LOPD).
- The Privacy Officer may perform other functions and duties. GI shall ensure that such functions and tasks do not give rise to a conflict of interest.

In addition, the Privacy Officer has the following **functions and responsibilities:**

- Report to the Privacy Committee on privacy issues.
- Inform and advise the various Privacy Officers and employees who deal with the processing of personal data
- Coordinate periodic reviews of the state of compliance of the facilities or factories.
- Action Plans: Monitor Action Plans for GDPR adequacy.
- Processing Inventory: Coordinate and monitor that the Processing Inventory is up to date.
- Impact Assessments: Coordinate and supervise that Impact Assessments are conducted and updated.
- Risk Analysis: Coordinate and supervise the review and updating of Risk Analysis.
- Responsible Relationship and Processing Manager: Coordinate and supervise that the agreements with the Processing Managers have adequate measures and clauses.
- Stakeholder Rights: Analyse and respond to Stakeholders who exercise their rights.
- Information and Consent: To carry out and coordinate the communication of information to the interested parties and the procedures for requesting express consent.
- Incident Management:
 - Record possible security incidents
 - Assess the impact of possible security incidents
 - Escalate possible security incidents to the Privacy Committee.





POL006	
Policy	
Internal Audit	

&Compliance

- Support in the resolution of possible security incidents.
- o Notify employees and the supervisory authority of possible security incidents.

The contact details of the Privacy Officer are given in the annex.

6.3 Privacy Manager

GI appoints a Privacy Manager at each of its facilities under the **following premises**:

- GI appoints a Privacy Manager at each of its facilities under the following premises:
- Glwill ensure that the Privacy Manager is involved in an appropriate and timely manner in all matters relating to the protection of personal data for which his or her establishment is responsible or in charge of processing.
- GI will support the Privacy Manager in the performance of his or her duties by providing the necessary resources for the performance of those duties and for access to personal data and processing operations, and for the maintenance of his or her expertise.
- GI will ensure that the Privacy Manager does not receive any instructions regarding the performance of his or her duties. He shall not be dismissed or punished for carrying out his duties.
- The Privacy Manager will report functionally to the Privacy Officer.
- The interested parties may contact the Privacy Manager regarding all matters relating to the processing of their personal data and the exercise of their rights under the RGPD and the various local regulatory developments
- The Privacy Manager may perform other functions and duties. GI shall ensure that such functions and tasks do not give rise to a conflict of interest.

In addition, the Privacy Manager has the following **roles and responsibilities**:

- Report to the Privacy Responsible on Privacy matters.
- To inform and advise the different units in charge of processing and the employees who deal with the processing of personal data.
- Facilitate the performance of periodic reviews of the compliance status of your installation or factory.
- Action Plans: Ensure and report on the implementation of the Action Plans for GDPR adequacy.
- Processing Inventory: Provide support to ensure that the Processing Inventory is up to date.
- Impact Assessments: Provide the necessary support to conduct or update Impact Assessments.
- Risk Analysis: Provide support when necessary to carry out or update Risk Analysis.
- Controller and processor: Identify the processors and coordinate local support to ensure that agreements have adequate measures and provisions.
- Rights of the Data subject: To provide the necessary local support to enable the Stakeholders who exercise their rights to respond.
- Information and Consent: To provide local support for the correct communication of information to interested parties and express consent.
- Incident Management:
 - Detect possible security incidents.
 - Communicate possible security incidents.
 - Support in the resolution of possible security incidents.

The contact details of every Privacy Manager are given in the annex.

6.4 Head Unit / Processing Managers

The Head of unit / Processing Managers are the areas / departments within GI whose **functions and responsibilities** are:

• Report Privacy Matters to the Privacy Officer.





POL006	
Policy	
Internal Audit	

- To advise employees who deal with the processing of personal data.
- Facilitate the performance of periodic reviews of the compliance status of your installation or factory.
- Processing Inventory: Provide support to ensure that your processing are up to date.
- Impact Assessments: Provide the necessary support to conduct or update Impact Assessments.
- Risk Analysis: Provide support when necessary to carry out or update Risk Analysis.
- Responsible Relationship and Processing Manager: Identify the Processing Managers associated with your Processing.
- Information and Consent: To provide local support for the correct communication of information to interested parties and express consent.
- Incident Management:
 - Detect possible security incidents.
 - Communicate possible security incidents.

The main **role and responsibility** of the head of Units/Processing Managers is to collaborate with the Privacy Officer and/or Privacy Manager in the performance of their duties.

6.5 RACI Matrix

The following matrix summarizes in a grouped manner the different roles and responsibilities of each of the roles described in the previous sections.

The following nomenclature is used:

- R: (Responsible).
- A: (Accountable).
- C: (Consulted).
- I: (Informed).

Function	Privacy Committee	Privacy Officer	Privacy Manager	Head of unit, processing/ manager
Inform and advise on privacy issues.		R/A	R	
Clauses in contracts with processors and third parties.		R/A	R	С
International Data Transfers	I	R/A	R	С
Personal Data Retention Policy	А	R	R	C / I
Maintenance and updating of the Security Measures implemented	I	R/A	R	I
Detect possible security incidents	I	R/A	R	С
Assess the impact of potential security incidents	I	R/A	R	С
Escalate possible security incidents	I	R/A	R	I
Record possible security incidents	I	R/A	R	С
Support in the resolution of possible security incidents.	C/I	R/A	R	C/I
Notify the Regulatory Body of possible safety incidents.	I	R/A	С	I
Notify the affected parties of possible security incidents.	I	R/A	С	I





POL006

Policy

Internal Audit &Compliance

Function	Privacy Committee	Privacy Officer	Privacy Manager	Head of unit, processing/ manager
Conduct periodic reviews of compliance status	I	R/A	С	С
Regular monitoring of possible action plans established	I	R/A	R	
Periodically report on compliance status	I	R/A	R	
Cooperate and act as a point of contact with the supervisory authority if required.	I	R/A	I	

7. UPDATING AND REVISION OF THE MANAGEMENT MODEL

This document will be kept up to date and will be reviewed by the GI Privacy Officer at least every six months or whenever there are relevant changes in the organization that make this advisable.

8. LANGUAGE

This Standard is published in Spanish and English, the former being prevalent in case of divergence between the two.

9. APPROVAL AND ENTRY INTO FORCE

This Standard has been approved by the Compliance Committee of Gonvarri Industries Group on July the 19th of 2018, and takes effect 20 calendar days after its approval. As of the entry into force, the previous provisions existing in their case that regulate the same content are repealed.

SIGNED BY COMPLIANCE COMMITTEE





POLOO6 Policy

Internal Audit &Compliance

10.ANNEX

10.1 Perimeter

The establishments/companies within the scope of GI are detailed below:

Company Name	Туре	Name	Location	City	Country
GONVARRI Corporación Financiera, S.L.	Shared Service Center	Corporación Financiera	Calle Prolongación de Embajadores, s/n, 28053 Madrid	Madrid	España
	Factory	Gonvarri Burgos	Polígono Gamonal Villimar, Calle la Bureba, 7, 09007 Burgos	Burgos	España
GONVARRI I.Centro de Servicios, S.L.	Factory	Gonvarri Barcelona	Polígon Industrial Sant Vicenç, Carrer Ferralla, 32, 08755 Castellbisbal, Barcelona	Castellbisbal (Barcelona)	España
	Shared Service Center	Corporación Financiera	Calle Prolongación de Embajadores, s/n, 28053 Madrid	Madrid	España
GONVARRI Tarragona, S.L.	Factory	Gonvarri Tarragona	Lugar Moll D'Aragó, 0, 43004 Tarragona	Tarragona	España
GONVARRI Valencia, S.L.	Factory	Gonvarri Valencia (Ferrodisa)	Autovía siderúrgica Villa- Gris, s/n Puerto Sagunto	Puerto de Sagunto (Valencia)	España
GONVARRI Vizcaya, S.A.	Commercial Office	Gonvarri Vizcaya	Calle Done Bikendi, 8, 48001 Bilbao, Bl	Bilbao	España
GONVARRI MS Corporate, S.L	Commercial Office	Metal Structures Corporate	Polígono Industrial Cancienes 33470 Corvera, Asturias.	Cancienes (Aviles)	España
Gonvauto Asturias S.L	Factory	Gonvauto Asturias	Polígono Industrial Cancienes 33470 Corvera, Asturias.	Cancienes (Aviles)	España
Gonvauto, S.A.	Factory	Gonvauto Barcelona	Polígon Industrial Sant Vicenç, Carrer Ferralla, 32, 08755 Castellbisbal, Barcelona	Castellbisbal (Barcelona)	España
Gonvauto Navarra, S.A.	Factory	Gonvauto Navarra	Polígon Industrial Sant Vicenç, Carrer Ferralla, 32, 08755 Castellbisbal, Barcelona	Castellbisbal (Barcelona)	España
Gonvauto Galicia, S.A.	Factory	Gonvauto Galicia	Lugar Muelle Pesquero, 0 S/N, 36900 Marín, PO	Marín (Pontevedra)	España
Gonvarri Asturias S.A	Factory	Hiasa	Polígono Industrial Cancienes 33470 Corvera, Asturias.	Cancienes (Aviles)	España
GM Solar Construction S.L	Factory	Hiasa	Polígono Industrial Cancienes 33470 Corvera, Asturias.	Cancienes (Aviles)	España



P0L006

Policy

Company Name	Туре	Name	Location	City	Country
Road Steel Engineering S.L	Service	Hiasa	Polígono Industrial Cancienes 33470 Corvera, Asturias.	Cancienes (Aviles)	España
Solar Steel Engineering S.L	Service	Hiasa	Polígono Industrial Cancienes 33470 Corvera, Asturias.	Cancienes (Aviles)	España
Gonvarri Solar Steel S.L	Service	Hiasa	Polígono Industrial Cancienes 33470 Corvera, Asturias.	Cancienes (Aviles)	España
Supports S.L	Service	Supports	Autovía siderúrgica Villa- Gris, s/n Puerto Sagunto	Puerto de Sagunto (Valencia)	España
GONVARRI Aluminium, GMBH.	Factory	Gonvarri Alumium	Wolff-Knippenberg-Straße 3, 99334 Amt Wachsenburg, Alemania	Amt Wachsenburg	Alemania
GONVARRI Automotive GMBH	Factory	Gonvarri Automotive	Wolff-Knippenberg-Straße 3, 99334 Ichtershausen, Alemania	Amt Wachsenburg	Alemania
Gonvauto Thüringen,	Factory	Gonvarri Thüringen	Wolff-Knippenberg-Straße 3, 99334 Ichtershausen, Alemania	Amt Wachsenburg	Alemania
GMBH	Commercial Office	Gonvarri Thüringen	Düsseldorf - Neuer Zollhof 3 5 etage 40221 Düsseldorf Alemania.	Düsseldorf	Alemania
GONVARRI Polska, SP, ZO O.	Factory	Gonvarri Polonia	Działkowców 13, 62-300 Września, Polonia	Września	Polonia
GONVARRI Ptos. Siderúrgicos,S.A.	Factory	Gonvarri Portugal	Sitio Vendas De Azeitão, Vendas De Azeitão, Setúbal, Portugal	Setúbal	Portugal
	Factory	Steel & Alloy Slitting Centre	Bridge Street North. Warley, West Midlands, West Midlands, UK	Warley	ик
Steel & Alloy Ltd.	Factory	Steel & Alloy Narrow Products /Coil Distribution	Kendricks Road, Darlaston, West Midlands, West Midlands, UK	Darlaston	UK
	Factory	Steel & Alloy UK	Trafalgar Works, Union Street, West Midlands, UK	West Bromwich	UK
	Distribution Center	Steel & Alloy Distribution Centre	Wolverhampton Road, Cannock, UK	Cannock	UK
	Factory	Steel & Alloy Newton Aycliffe	Aycliffe Industrial Park, Newton Aycliffe, UK	Newton Aycliffe	UK



POLOO6
Policy

Internal Audit &Compliance

Company Name	Туре	Name	Location	City	Country
CF Group Oy	Commercial Office	CF Group Oy	Sauvonrinne 12, 08500 Lohja	Lohja	Finlandia
Constructor Finland Oy	Commercial Office	Constructor Finland Oy	Sauvonrinne 12, 08500 Lohja	Lohja	Finlandia
Dexion, GMBH	Factory	Dexion Alemania	Dexion GmbH, Dexionstraße 1, 35321 Laubach, Alemania	Laubach	Alemania
Dexion Kft	Commercial Office	Dexion Hungria	Budaörs, Baross u. 89, 2040 Hungría	Budaörs	Hungria
Dexion NV/SA	Commercial Office	Dexion Belgica	Bureau & Design Center Heyzzel pleinplein B50 - BE-1020 Brussel	Bruselas	Bélgica
Dexion Storage Solutions SRL	Factory	Dexion Rumania	Strada Câmpului 1A, Râșnov 505400, Rumanía	Rasnov	Rumania
Constructor Sverige AB	Commercial Office	Constructor Suecia	Bergsjödalen 60, 415 23 Göteborg, Suecia	Göteborg	Suecia
Constructor Shared Services AB	Shared Service Center		Bergsjödalen 60, 415 23 Göteborg, Suecia	Göteborg	Suecia
Dexion Polska Sp. Z.o.o	Commercial Office	Dexion Polonia	Wenecka 12, 03-244 Warszawa, Polonia	Warszawa	Polonia
Dexion SRO Czech	Commercial Office	Dexion Chequia	Antala Staška 220/77 Krč, 140 00 Praha 4, Česká republika	Praha	Chequia
Dexion Spol sro	Commercial Office	Dexion Eslovaquia	Diaíničná cesta 5, Hala B,, 903 01 Senec, Eslovaquia	Senec	Eslovaquia
Constructor Group UK Ltd	Commercial Office	Contructor UK	Murdock Rd, Swindon SN3 5HY, Reino Unido	Swindon	UK
Constructor Dexion Holland BV	Commercial Office	Dexion Holanda	Nijverheidsweg 23H, 3641 RP Mijdrecht, Países Bajos	Mijdrecht	Holanda
Constructor Danmark A/S	Commercial Office	Constructor Denmark	Rorupvej 1, 4320 Lejre, Dinamarca	Lejre	Dinamarca
Constructor Norge AS Norway	Commercial Office	Constructor Noruega	Østensjøveien 27, 0661 Oslo	Oslo	Noruega
Flejes Industriales S.A	Factory	FLINSA	Avenida de la Provincia, 87. 03440, IBI (Alicante)	IBI	España

10.2 Main Establishment

The following are designated as the principal establishment of GI:

GONVARRI Corporación Financiera, S.L. Prolongación de Embajadores s/n

28053 Madrid



POL006
Policy
Internal Audit

10.3 Privacy Committee

The Privacy Committee is designated as the maximum reporting unit for Privacy matters. In this regard, the members of the Privacy Committee must belong to the following departments:

IT	Responsible person designated by that department.
Legal Deparment	Responsible person designated by that department.
Compliance	Responsible person designated by that department.
HR	Responsible person designated by that department.

10.4 Privacy Officer

The following are designated as Privacy Officer of GI:

Daniel Lluch Pindado daniel.lluch@qonvarri.com +34 91 275 13 86

10.5 Privacy Managers

The following are designated as Privacy Managers for GI companies:

Company	Туре	Gonvarri Name	Privacy Manager	Email	Phone Number
GONVARRI	Shared	Согрогасіо́	Classified on the	Classified on the web	Classified on the web
Corporación	Service	n	web version	version	version
Financiera, S.L.	Center	Financiera			
	Factory	Gonvarri	Classified on the	Classified on the web	Classified on the web
		Burgos	web version	version	version
GONVARRI I.Centro de	Factory	Gonvarri	Classified on the	Classified on the web	Classified on the web
Servicios, S.L.		Barcelona	web version	version	version
) Sei VICIOS, S.L.	Shared	Согрогасіо́	Classified on the	Classified on the web	Classified on the web
	Service	n	web version	version	version
	Center	Financiera			
GONVARRI Tarragona,	Factory	Gonvarri	Classified on the	Classified on the web	Classified on the web
S.L.		Tarragona	web version	version	version
GONVARRI Valencia,	Factory	Gonvarri	Classified on the	Classified on the web	Classified on the web
S.L.		Valencia	web version	version	version
		(Ferrodisa)			
CODVODDI Vizcous	Commer	Gonvarri	Classified on the	Classified on the web	Classified on the web
GONVARRI Vizcaya, S.A.	cial		web version	version	version
	Office	Vizcaya			
GONVARRI MS Corporate, S.L	Commer	Metal	Classified on the	Classified on the web	Classified on the web
	cial	Structures	web version	version	version
	Office	Corporate			
Cooverto Osturias S.I.	Factory	Gonvauto	Classified on the	Classified on the web	Classified on the web
Gonvauto Asturias S.L		Asturias	web version	version	version



P0L006

Policy

_		Gonvarri			
Company	Type	Name	Privacy Manager	Email	Phone Number
Gonvauto, S.A.	Factory	Gonvauto	Classified on the	Classified on the web	Classified on the web
		Barcelona	web version	version	version
Gonvauto Navarra,	Factory	Gonvauto	Classified on the	Classified on the web	Classified on the web
S.A.	ractory	Navarra	web version	version	version
Gonvauto Galicia, S.A.	Factory	Gonvauto	Classified on the	Classified on the web	Classified on the web
		Galicia	web version	version	version
Gonvarri Asturias, S.A.	Factory	Hiasa	Classified on the	Classified on the web	Classified on the web
			web version	version	version
GM Solar Construction	Factory	Hiasa	Classified on the	Classified on the web	Classified on the web
S.L	, details	1.11434	web version	version	version
Road Steel	Service	Hiasa	Classified on the	Classified on the web	Classified on the web
Engineering S.L	20.0.00		web version	version	version
Gonvarri Solar Steel	Service	Hiasa	Classified on the	Classified on the web	Classified on the web
S.L	Service	111030	web version	version	version
Solar Steel	Service	Hiasa	Classified on the	Classified on the web	Classified on the web
Engineering S.L	Service	111030	web version	version	version
Supports S.L	Service	Supports	Classified on the	Classified on the web	Classified on the web
эоррогсэ э.с	Jet vice	Зоррогсз	web version	version	version
GONVARRI		Gonvarri	Classified on the	Classified on the web	Classified on the web
Aluminium, GMBH.	Factory	Alumium	web version	version	version
			CI ICI I	Cl 'C' l .l .l	CI 'C' I II
GONVARRI	Factory	Gonvarri	Classified on the	Classified on the web	Classified on the web
Automotive GMBH		Automotiv	web version	version	version
		е	Classicia de autor	Classician and a substitution of	Classicia de la companya
	Factory	Gonvarri	Classified on the	Classified on the web	Classified on the web
Gonvauto Thüringen,	_	Thüringen	web version	version	version
GMBH	Commer	Gonvarri Thüringen	Classified on the	Classified on the web	Classified on the web
			web version	version	version
CODVODDI Deleka CD	Office	Cooversi	Classified as the	Classified as the web	Classified on the web
GONVARRI Polska, SP, ZO O.	Factory	Gonvarri Polonia	Classified on the web version	Classified on the web	
GONVARRI Ptos.			Classified on the	version Classified on the web	version Classified on the web
	Factory	Gonvarri			
Siderúrgicos,S.A.		Portugal	web version	version	version
	Factory	Steel &	Classified on the	Classified on the web	Classified on the web
		Alloy	web version	version	version
		Slitting			
		Centre Steel &	Classified on the	Classified on the web	Classified on the web
	Factory				
Steel & Alloy Ltd.		Alloy Narrow	web version	version	version
		Products /Coil			
		Distributio			
		n			
		<u> </u>			



P0L006

Policy

Company	Туре	Gonvarri Name	Privacy Manager	Email	Phone Number
Steel & Alloy Ltd.	Factory	Steel & Alloy UK	Classified on the web version	Classified on the web version	Classified on the web version
	Distribu tion Center	Steel & Alloy Distributio n Centre	Classified on the web version	Classified on the web version	Classified on the web version
	Factory	Steel & Alloy Newton Aycliffe	Classified on the web version	Classified on the web version	Classified on the web version
CF Group Oy	Commer cial Office	CF Group Oy	Classified on the web version	Classified on the web version	Classified on the web version
Constructor Finland Oy	Commer cial Office	Constructo r Finland Oy	Classified on the web version	Classified on the web version	Classified on the web version
Dexion, GMBH	Factory	Dexion Alemania	Classified on the web version	Classified on the web version	Classified on the web version
Dexion Kft	Commer cial Office	Dexion Hungria	Classified on the web version	Classified on the web version	Classified on the web version
Dexion NV/SA	Commer cial Office	Dexion Belgica	Classified on the web version	Classified on the web version	Classified on the web version
Dexion Storage Solutions SRL	Factory	Dexion Rumania	Classified on the web version	Classified on the web version	Classified on the web version
Constructor Sverige AB	Commer cial Office	Constructo r Suecia	Classified on the web version	Classified on the web version	Classified on the web version
Constructor Shared Services AB	Shared Service Center		Classified on the web version	Classified on the web version	Classified on the web version
Dexion Polska Sp. Z.o.o	Commer cial Office	Dexion Polonia	Classified on the web version	Classified on the web version	Classified on the web version
Dexion SRO Czech	Commer cial Office	Dexion Chequia	Classified on the web version	Classified on the web version	Classified on the web version
Dexion Spol sro	Commer cial Office	Dexion Eslovaquia	Classified on the web version	Classified on the web version	Classified on the web version
Constructor Group UK Ltd	Commer cial Office	Contructor UK	Classified on the web version	Classified on the web version	Classified on the web version



P0L006

Policy

Company	Туре	Gonvarri Name	Privacy Manager	Email	Phone Number
Constructor Dexion Holland BV	Commer cial Office	Dexion Holanda	Classified on the web version	Classified on the web version	Classified on the web version
Constructor Danmark A/S	Commer cial Office	Constructo r Denmark	Classified on the web version	Classified on the web version	Classified on the web version
Constructor Norge AS Norway	Commer cial Office	Constructo r Noruega	Classified on the web version	Classified on the web version	Classified on the web version
Flejes Industriales S.A	Factory	FLINSA	Classified on the web version	Classified on the web version	Classified on the web version