

Policy Name: THIRD PARTY PRIVACY POLICY

INTRODUCTION

ArcelorMittal Dofasco is committed to protecting the privacy and security of personal information belonging to third parties with whom it engages in business, as this is a fundamental component of our corporate values and the way we do business.

ArcelorMittal Dofasco adheres to the provisions set out in the Personal Information Protection and Electronic Documents Act (PIPEDA) and ensures the confidentiality and safeguarding of personal information of third parties that is collected, used and disclosed in the course of commercial activities.

1. PIPEDA DEFINITIONS

A commercial activity is defined as any particular transaction, act or conduct or any regular course of conduct that is of a commercial character, including the selling, bartering or leasing of donor, membership or other fundraising lists.

Personal information is information about an identifiable individual and includes address, telephone number and any numerical identification. It does not include the name, title or business address or business telephone number of an employee of an organization.

2. COLLECTION, USE, DISCLOSURE AND RETENTION OF PERSONAL INFORMATION IN THE COURSE OF COMMERCIAL ACTIVITIES

ArcelorMittal Dofasco collects, uses, discloses and retains certain types of personal information of third parties for the purpose of administering certain third party contracts, programs and procedures (the "Purpose"). ArcelorMittal Dofasco only discloses personal information to organizations which require it in connection with fulfilling the Purpose.

ArcelorMittal Dofasco is required to inform third parties and obtain consent before disclosing their personal information in the course of commercial activities. Exceptions to the requirement to obtain knowledge and consent of the third party include situations where ArcelorMittal Dofasco has a legal obligation pursuant to a court order or if an investigation into a breach of an agreement or the law exists.

The collection, use, disclosure and retention of personal information, which is subject to PIPEDA, will be limited to that which is necessary for the intended purpose, except with the consent of the third party or as provided by law. Information shall only be retained for as long as it is necessary to fulfill the purposes for its collection unless otherwise required by law.

3. SAFEGUARDING THIRD PARTY PERSONAL INFORMATION

ArcelorMittal Dofasco remains committed to ensuring that third party personal information is secure. Comprehensive security controls have been established to protect against unauthorized use, alteration, duplication, destruction, disclosure, loss or theft, or unauthorized access to personal information.

ArcelorMittal Dofasco may from time to time use third party service providers to perform certain functions, such as office services and data processing. In these circumstances, such third party service providers are contractually bound to safeguard the personal information transferred to them with measures comparable to that provided by ArcelorMittal Dofasco and described in this policy, and not to retain, use or disclose the personal information transferred to them for any purpose other than the provision of services to ArcelorMittal Dofasco.

4. COMPLIANCE CONCERNS

Any issues or questions regarding Third Party Privacy should be directed to the Chief Privacy Officer at corpsec@dofasco.ca.