

PERSONAL DATA BREACH REPORTING GUIDELINES

Date last updated:	October 10, 2023
Responsible team:	WireCo Corporate Human Resources & Legal
Applicable region:	Europe
These guidelines apply to:	All employees, contractors, interns and all others working in any capacity for WireCo and its affiliates (“ Staff ”)

I. Why do we have these guidelines?

These WireCo Personal Data Breach Reporting Guidelines are intended to support WireCo's Staff with identifying and reporting an actual or potential personal data breach to the responsible persons at WireCo.

These guidelines are based on the requirements for handling a personal data breach under the rules of the European Union's General Data Protection Regulation (“**GDPR**”). It is expected that all Staff follow the approach and steps set out in these guidelines, to enable WireCo to demonstrate to its regulators consistency of approach and compliance with legal requirements when dealing with a personal data breach.

Under the GDPR, WireCo may be under a mandatory legal statutory law obligation to notify its regulators about certain personal data breaches. To be able to comply with these notification duties, it is essential that all our Staff understands what a personal data breach is and helps with identifying any actual or potential personal data breach.

These guidelines will be reviewed periodically and updated as necessary by the Corporate Human Resources and Legal teams to comply with any requirements WireCo is subject to. Please make sure to check back from time-to-time and read the then latest version of these guidelines. The latest version can always be found on WireCo's Associate Portal or your local HR office.

II. What are the key requirements for you?

You should:

- understand how to identify an actual or potential personal data breach; and
- know the procedures to follow if an actual or potential personal data breach has been identified, as set out in these guidelines.

III. What is a personal data breach?

A **personal data breach**, according to the GDPR, is a breach of security which leads to personal data being accidentally or unlawfully destroyed, lost, altered or disclosed, accessed, transmitted, stored or otherwise processed without authorization.

Personal data is, broadly, any information which can be used to identify an individual, either directly or indirectly. This includes, for instance, with regard to employees their names, addresses, email addresses, IP addresses, account numbers, banking details, ID numbers and employment records. It also includes personal data WireCo receives and processes on behalf of its customers in connection with providing WireCo's services to the customers.

Please note that under the GDPR, the concept of personal data is broader than PII (Personally Identifiable Information) under U.S. law. This means that there are categories of data which qualify as personal data under the GDPR while they do not qualify as PII from a U.S. law perspective.

Examples of the **causes** of personal data breaches may include, but are not limited to:

- employee actions or mistakes (such as the loss or theft of electronic equipment);
- external attacks by criminal hackers;
- vulnerabilities in software applications or company processes (such as inappropriate access controls allowing unauthorized use); or
- fraudulent acts.

Personal data breaches come in all shapes and sizes, ranging from large scale breaches affecting the whole business to much smaller breaches (such as sending an e-mail to the wrong person or sending emails to multiple external recipients using an open email distribution list).

There are 3 broad categories of personal data breaches:

1. **Confidentiality breach** – where there is an unauthorized or accidental **disclosure of**, or **access to** personal data.
2. **Integrity breach** – where there is an unauthorized or accidental **alteration** of personal data.
3. **Availability breach** – where there is an accidental or unauthorized **loss of access to**, or **destruction** of personal data.

IV. How should you respond to an actual or potential personal data breach?

If you become aware, or are notified, of an actual or potential personal data breach immediately notify the WireCo Corporate Legal Team by email to WirecoLegal@wireco.com. Alternatively, you may report a breach via WireCo's Open Reporting Compliance Tool (<https://wireco.ethicspoint.com/>) or by calling one of the numbers listed below.

If you are unsure as to whether you should take this action, you should speak to your direct manager as soon as possible. Always err on the side of caution. Please be aware that the GDPR provides for short timeframes during which notification of a personal data breach is required. Thus, time is of the essence.

Once you have notified an actual or potential personal data breach to the Corporate Human Resource or Legal team, they will conduct an investigation into the potential data breach and may contact you for further information.



V. What should you not do?

You should not:

- carry out your own investigations or enquires into the personal data breach
- attempt to delete or alter records or emails, information, logs or notes that might relate to the personal data breach.
- inform anyone else, other than the Corporate Human Resources or Legal team and, if necessary, your direct manager, about the personal data breach or carry out any further steps unless you have been asked to do so by the Corporate Human Resources or Legal team or unless steps are critically urgent in order to prevent damage from occurring.

VI. Who can you contact if you have any questions regarding these guidelines?

If you have any questions regarding these guidelines, you may always reach out to your direct manager, your local human resources manager or the Corporate Human Resources or Legal team.

Compliance Report Hotline by country:

U.S. – 800-371-2173

Australia – 1-800-551-155 (Optus) or 1-800-881-011 (Telstra) Then dial: 844-287-1890

Brazil – 0800-892-0644

China – 108-888 / Then dial 844-287-1890

Denmark – 800-100-10 / Then dial 844-287-1890

France - 0800-90-2876

Germany – 0-800-225-5288 / Then dial 844-287-1890

Mexico – 001-800-658-5454 / Then dial 844-287-1890

Netherlands – 0800-022-9111 / Then dial 844-287-1890

Poland – 00-800-151-0065 o Portugal - 800-800-128 / Then dial 844-287-1890

Russia – 363-2400 / Then dial 844-287-1890

Spain – 900-99-0011 / Then dial 844-287-1890

United Arab Emirates – 8000-021 / Then dial 844-287-1890

United Kingdom – 0-800-89-0011 / Then dial 844-287-1890

