

SAIPEM S.P.A. Via Luigi Russolo, 5 20138 Milano - Italia

INFORMATION NOTICE REGARDING THE PROCESSING OF INTERNS' PERSONAL DATA IN ACCORDANCE WITH ARTT. 13 AND 14 OF REGULATION (UE) 2016/679 ("GDPR")



Data Controller

The data provided are processed by **Saipem S.p.A.**, Via Luigi Russolo, 5 20138 Milan - Italy.

E-mail address: privacy@saipem.com ("Company" or "Controller")



Data Protection Officer (DPO)

The DPO can be contacted at: dpo@saipem.com



Personal Data Processed and source of data

Please note that all the personal data provided will be processed in accordance with current legislation on privacy. Therefore the Company undertakes to process said data in accordance with the principles of fairness, lawfulness and transparency, in compliance with the purposes set out below, collecting said data only for specified and necessary purposes. Only authorised and properly trained personnel will be allowed to use said data in order to guarantee the necessary confidentiality of the information provided.

In particular, the Company collect, record, consult and generally process personal and identifying data (such as name, surname, address, telephone number, e-mail, bank and payment details).

Data are collected from the data subject at the time of finalization of the internship program or, can be acquired by third parties (e.g. promoting entity) for the establishment of the training and internship plan.

| [| Purpose of the processing | Legal basis of the processing | Retention period of data |
|----|--|--|---|
| 1. | Personnel management and administration, and fulfilment of obligations arising from the training plan. | The lawfulness of processing for the common data is the execution of the internship contract. | Personal data will be stored for 10 years from the termination of the internship program, except for the need to extend the retention |
| 2. | Fulfilment of regulatory obligations. | The lawfulness of the processing for common data is based on the need to comply with the legal obligations to which the Controller is subject. | period for the duration of any litigation, until completion of the terms of implementation outlined in legal remedies. |
| 3. | Control of physical access - through a badge - to Company offices and sites in order to guarantee the safety of people and property. | The lawfulness of the processing for common data is based on the need to comply with the legal obligations to which the Controller is subject. | Personal data relating to access control by badge will be stored for a period of 5 years. |
| 4. | Control of physical access through video surveillance systems in order to guarantee the safety of people and property. | The lawfulness of processing is the legitimate interest of the Data Controller. | Personal data will be stored for a period of 7 days, at the expiry of which, the images will be automatically overwritten. |



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| Data mining activities to improve work processes. | The lawfulness of processing for common data is the legitimate interest of the Data Controller. | Personal data will be kept only as long as strictly necessary to fulfill the purpose. |
|---|---|--|
| 6. If necessary, to assert or defend a right of the Company in court or in arbitration and conciliation procedures. | The lawfulness of processing for common data is the legitimate interest of the Data Controller. | For the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies. |

Once the retention period has elapsed, the data will be destroyed or made anonymous compatibly with technical erasure and backup procedures.



Way of processing and provision of data

The processing will be carried out in digital and/or traditional form, with methods and tools aimed at ensuring maximum security and confidentiality, by persons specifically appointed for this purpose.

The provision of data is necessary for the finalization of the internship contract and to fulfil legal obligations. A refusal to provide data will make it impossible to establish or continue the relationship with the Company.



Recipients and data transfer

The Company - without needing specific consent - may communicate personal data to other subjects, the categories of which are described in detail below, for example:

- Saipem Group companies, even if not located in the EU (based on the adequacy decisions by the European Commission or on the basis of standard contractual clauses), in order to carry out the activities required by the application process;
- Third parties (by way of indication, companies providing IT services, payroll companies, etc.), including those not located within the EU, who carry out outsourcing activities on behalf of the Controller, in their capacity as data processors. The transfer of data to countries outside the EU is guaranteed by the adequacy decisions of the European Commission or on the basis of standard contractual clauses;
- Judicial authorities, as well as those subjects to whom communication is required by law. These subjects will process the data in their capacity as independent Data Controllers.

Data will not be subject to disclosure.



Data Subjects rights

Data Subjects have the right to ask the Controller for access to their personal data, rectification, deletion or portability of their personal data, integration of incomplete personal data, limitation of processing in the cases provided for by art. 18 GDPR. In addition, where applicable, Data Subjects may revoke their consent at any time.

These rights can be exercised at any time, against the Controller, by sending a specific request in writing to the e-mail addresses dpo@saipem.com or privacy@saipem.com.

Data Subjects have also the right to lodge a complaint to the competent Supervisory Authority and to use other means of protection provided by applicable law.