	FORM Global Projects Services AG		Doc. no. FORM-GPS-PRV-010-E	
	INFORMATION NOTICE REGARDING THE PROCESSING OF CANDIDATES' PERSONAL DATA IN ACCORDANCE WITH THE SWISS FEDERAL DATA PROTECTION ACT (FDPA) AND REGULATION (UE) 2016/679 (GDPR)		Rev. 01	Date 14/11/2024
			Page 1 of 6	
			Ref. Doc. STD_GR-GPS-PRV-001-E	

INFORMATION NOTICE REGARDING THE PROCESSING OF CANDIDATES' PERSONAL DATA IN ACCORDANCE WITH THE SWISS FEDERAL DATA PROTECTION ACT (FDPA) AND REGULATION (UE) 2016/679 (GDPR)

Information notice regarding the processing of Personal Data of Candidates

in accordance with the Swiss Federal Data Protection Act (FDPA) and Regulation (UE) 2016/679 (GDPR), if applicable



Data Controller and Contact Point

Your personal data are processed by Global Projects Services AG, Uetlibergstrasse 134a, 8045 Zürich, Switzerland (**GPS or Company**) as data controller and the persons or legal entities which process these data on GPS' behalf as data processors.

The contact point within GPS for Candidates who want to exercise their rights under the Federal Data Protection Act (FDPA) and any other data protection laws that may be applicable, in particular the European General Data Protection Regulation (GDPR), the Federal Data Protection and Information Commissioner (FDPIC) and any other data protection authorities competent for the data processing by the Company can be contacted under privacygps@saipem.com.



Personal Data Processed

This Information Notice on the Processing of Personal Data of Candidates (**Information Notice**) applies to all personal data that you (**you or Candidate**) provide or that are provided to or collected by or on behalf of GPS in connection with your application for a job position with GPS and your evaluation for that position.

Please note that all of the personal data will be processed in accordance with the FDPA, in the version applicable and any ordinances, guidelines and information sheets issued thereunder by the FDPIC or any other competent public authority, and any other data protection laws that may be applicable, in particular the GDPR. The Company undertakes to process your personal data in accordance with the principles of fairness, lawfulness and transparency, in compliance with the purposes set out below and only insofar as necessary for these specified purposes. Only authorized and properly trained personnel will be allowed to process your data.

The Company will collect, record, consult and generally process your personal data, among others name, surname, address, phone number, e-mail-address, place and date of birth, educational qualifications, prior activities and professional affiliations, name of reference persons, testimonials, and any other data provided by you or collected lawfully by or on behalf of GPS, including sensitive personal data.

GPS may ask you to provide a medical certificate stating whether you are fit for the job for which you apply.

The GPS recruitment officers may ask you for additional information necessary for the application and evaluation process. A refusal to provide data requested may mean that your application cannot be considered.

GPS will process any personal data, including sensitive personal data, insofar as necessary for the application and evaluation process. Any personal data submitted through the communication feature of social media platforms and applicant tracking system/website, is subject to the data privacy policy of the respective social media platform/applicant tracking system/website in addition to this Information Notice.



Purpose of the processing



Legal basis of the processing



Retention period of data




1. Registration for a **job application** through our web-based online application tool, by e-mail to GPS or any of its affiliates, via our external agencies, or through the communication

The processing of personal data is lawful because it is necessary to take steps at your request prior to entering into a contract (art. 6 para. 1 lit. (b) GDPR) and for the purposes of the legitimate interests of GPS to evaluate your candidacy for an open

The normal retention period is 12 months from your last update of your CV or other application documentation. In case of a negative decision, after this period, all data will be deleted except that GPS may maintain your name,

function of social media platforms.	job position at GPS (art. 6 para. 1 lit. (f) GDPR).	address, nationality, position for which you applied and your contact detail, and, separately and unrelatedly, some application data in an anonymized format. In case of a positive decision, after this period of 12 months, your personal data exclusively related to the application and evaluation will be deleted, and certain other personal data will be retained pursuant to the Information Notice regarding the Processing of Employees' Personal Data of GPS.
2. Recruitment and selection for open positions (including positions in an internship program) and, in case of a positive decision, negotiation and conclusion of an employment contract.	The processing of personal data is lawful because it is necessary to take steps at your request prior to entering into a contract (art. 6 para. 1 lit. (b) GDPR), for the purposes of the legitimate interests pursued by GPS or a third party to evaluate your candidacy for an open job position at GPS (art. 6 para. 1 lit. (f) GDPR). The processing of sensitive personal data is lawful, because it is necessary for the purposes of carrying out the obligations and exercising the rights of GPS as data controller in the field of employment, accounting, tax, social security and social protection laws (art. 9 para. 2 lit. (b) GDPR).	The normal retention period is 12 months from your last update of your CV or other application documentation. In case of a negative decision, after this period, all data will be deleted except that GPS may maintain your name, address, nationality, position for which you applied and your contact detail, and, separately and unrelatedly, some application data in an anonymized format. In case of a positive decision, after this period of 12 months, your personal data exclusively related to the application and evaluation will be deleted, and certain other personal data will be retained pursuant to the Information Notice regarding the Processing of Employees' Personal Data of GPS.
3. Internal controls to ensure that your application is handled and decided upon in compliance with the hiring and selection standards of GPS and the applicable laws.	The processing of personal data is lawful because it is necessary for compliance with legal obligations to which GPS is subject (art. 6 para. 1 lit. (c) GDPR) and for the purposes of the legitimate interest of GPS to evaluate our application and evaluation processes for compliance with applicable laws and internal standards (art. 6 para. 1 lit. (f) GDPR).	The normal retention period is 12 months from your last update of your CV or other application documentation. In case of a negative decision, after this period, all data will be deleted except that GPS may maintain your name, address, nationality, position for which you applied and your contact detail, and, separately and unrelatedly, some application data in an anonymized format. In case of a positive decision, after this period of 12 months, your personal data exclusively related to the application and evaluation will be deleted, and certain other personal

		data will be retained pursuant to the Information Notice regarding the Processing of Employees' Personal Data of GPS.
4. Participation in training and information events initiating your employment.	The processing of personal data is lawful because it is necessary to take steps at your request prior to entering into a contract (art. 6 para. 1 lit. (b) GDPR), for compliance with legal obligations to which we as data controller are subject (art. 6 para. 1 lit. (c) GDPR), and for purposes of the legitimate interests of GPS to train and inform the candidates before they start their employment (art. 6 para. 1 lit. (f) GDPR).	The normal retention period is 12 months from your last update of your CV or other application documentation. In case of a negative decision, after this period, all data will be deleted except that GPS may maintain your name, address, nationality, position for which you applied and your contact detail, and, separately and unrelatedly, some application data in an anonymized format. In case of a positive decision, after this period of 12 months, your personal data exclusively related to the application and evaluation will be deleted, and certain other personal data will be retained pursuant to the Information Notice regarding the Processing of Employees' Personal Data of GPS.
5. Asserting or defending against a right or claim of or against the Company in court, in arbitration, in conciliation procedures, or in criminal or administrative procedures.	The processing of personal data is lawful because it is necessary for compliance with legal obligations to which we as data controller are subject (art. 6 para. 1 lit. (c) GDPR), and for the purposes of the legitimate interest pursued by GPS to assert or defend a right or claim of or against the Company in judicial, arbitration, conciliation, criminal or administrative proceedings (art. 6 para. 1 lit. (f) GDPR). With regard to sensitive personal data, their processing is lawful because it is necessary to establish, exercise or defend against legal claims of GPS, the Candidate or third parties, or whenever courts are acting in their judicial capacity (art. 9 para. 2 lit. (f) GDPR).	Longer retention periods apply if GPS is under a legal requirement or has a legitimate interest to retain certain data for longer periods, in particular for the purposes set out in points 3 below. ³ Personal data can be retained longer than the period of 12 months (a) in cases in which a claim has been asserted or appears likely to be asserted by or against GPS for which these personal data may become relevant where processing is necessary for compliance with legal obligations to which GPS as data controller is subject [(art. 6 para. 1 lit. (c) GDPR)], and for the purposes of the legitimate interests of GPS to assert or defend a right or claim of or against GPS (art. 6 para. 1 lit. (f) GDPR) or (b) for the purposes of other legitimate interests pursued by GPS or by a third party (art. 6 para. 1 lit. (f) GDPR).

		<p>Personal data retained for the assertion of or defence against a right or claim of or against GPS (para. 3 lit. (a)) may be retained in general until the end of the term of prescription of the respective claim, plus an additional period for instituting, submitting or receiving a claim, pre-procedural negotiations and/or the duration of any possible litigation and arbitration until final and binding adjudication or of any negotiations in view of settlement until settlement in full, which will normally not exceed 11 years.</p> <p>After the normal retention period of para. 1 above, access to the personal data will be restricted in order to make sure that they are processed exclusively for the purposes that justify their longer retention.</p> <p>During the period of lawful retention, the data will be retained in accordance with standard data security, storage and backup procedures.</p>
<p>Once the period of lawful retention has elapsed, the data will be erased or made anonymous in accordance with standard data erasure and anonymization procedures compatibly with normal technical and routine erasure and backup procedures.</p>		
<div data-bbox="172 1350 258 1429"></div> <p>Way of processing and provision of data</p> <p>The processing of personal data will be carried out on digital, paper and other media, using methods and tools aimed at ensuring maximum security and confidentiality, by persons specifically appointed and qualified for this purpose. In case of an online application through the Company's website, the provision of data in the fields marked with an asterisk (*) is necessary to take your application into consideration in the recruitment and selection process. In case of an online application through the Company's website, your acknowledgment of this Information Notice is necessary to take your application into consideration in the recruitment and selection process. In case of an application submitted via e-mail, you will be redirected to the Company's website as described in the paragraphs above. This confirmation e-mail is necessary to take your application into consideration in the recruitment and selection process.</p>		
<div data-bbox="172 1769 274 1841"></div> <p>Recipients and data transfer</p> <p>The Company may transfer your personal data to other parties for the purposes set out above, for example:</p> <ul style="list-style-type: none"> Other Saipem Group companies as data processors for GPS (including the company for which the 	<div data-bbox="818 1758 904 1841"></div> <p>Data Subjects rights</p> <p>You have the right to ask GPS as the data controller for access to your personal data, and for rectification, erasure, and hand-over of your personal data in a structured, commonly used and machine-readable (portable) format, completion of incomplete personal</p>	

selected employee will perform work) in order to carry out certain activities as part of the application and selection process;

- Third parties (e.g., consultants, IT service providers, recruiting agents, applicant tracking system operators, etc.), who carry out certain activities and thereby process personal data on behalf of GPS as its (direct or indirect) data processors;
- Third parties (e.g., other companies for which the employee, if selected will perform work, insurance carriers, brokers and other independent intermediaries), which determine the purposes and means of processing your personal data, including special sensitive personal data, as independent data controllers based on their relationship with you,
- Administrative authorities, courts and arbitral tribunals, auditors, insurances etc., to whom disclosure of these personal data is required by law or necessary for the purposes of the legitimate interests of GPS. These subjects will process the data in their capacity as independent data controllers.

Personal data are transferred to third parties only under contractual or otherwise binding conditions that the data may only be used for the specific purposes for which they are transferred and not for any purpose-s for which GPS could not process them.

GPS may transfer personal data to any country outside Switzerland where any other Saipem Group companies have their seat or registered office or any establishment, or anywhere in the world also to any country where no other Saipem Group Company is present.

Personal data will only be transferred to countries outside Switzerland and the EU only if data privacy is guaranteed by adequacy decisions by the Federal Council (or the European Commission under the GDPR), by data protection provisions of a contract between the controller or the processor and its contracting party, standard model clauses, or binding corporate rules.

data, restriction of processing in the cases provided for by art. 18 GDPR, as well as the right to object to any processing that is not in compliance with the applicable laws, or for reasons related to your particular situation in cases where data processing is necessary for the purposes of the legitimate interests of GPS as the data controller or a third party, stating explicitly which interests or fundamental rights and freedoms of yours requiring protection of personal data override the legitimate interests of GPS or the third party, or restriction of disclosure to third parties that is not in compliance with the applicable laws and this Information Notice. In addition, only in case the data are processed on the basis of your consent, you may revoke your consent at any time with effect for the future.

These rights may be exercised at any time against GPS as the Data Controller by sending a specific request in writing to the e-mail addresses **privacygps@saipem.com**. You can also write to the Company at the address given in the letterhead above.

You are aware that a deletion, hand-over in a portable format, restriction of processing or of disclosure to third parties or revocation of your consent for processing of your personal data may mean that your application can no longer be considered.

You also have the right to lodge a report or complaint with the FDPIC or any other competent Supervisory Authority and to use other means of protection, as provided by the FDPA and other applicable laws.

This Information Notice on data processing is available on the GPS website at www.gpsag.ch.