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	INFORMATION NOTICE REGARDING THE PROCESSING OF INTERNATIONAL EMPLOYEES' PERSONAL DATA IN ACCORDANCE WITH THE SWISS FEDERAL DATA PROTECTION ACT (FDPA) AND REGULATION (UE) 2016/679 (GDPR)		Rev. 02	Date 13/01/2025
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INFORMATION NOTICE REGARDING THE PROCESSING OF INTERNATIONAL EMPLOYEES' 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 International Employees
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.

Employees who want to exercise their rights under the Federal Data Protection Act (**FDPA**) and any other applicable data protection laws, 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, may contact GPS under privacygps@saipem.com.



Personal Data Processed

This Information Notice on the Processing of Personal Data of International Employees (**Information Notice**) applies to all personal data that you as Employee of GPS to be deployed to companies outside Switzerland (**you** or **Employee**) provide or that are collected by or on behalf of GPS in connection with your employment relationship with GPS. For the avoidance of doubt, it does not apply to any data processed for the purposes of and in relation to taxes, pension plans, social security or insurance contracts, declarations, terms applicable to them or any change thereof, information or communication relating to them, or payments made or received in relation to them, even if the Company was involved therein.

All your personal data will be processed in accordance with the FDPA, as amended, and any ordinances, guidelines and fact sheets issued thereunder by the FDPIC or any other competent public authority, and any other data protection laws and regulations 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 said data.

The Company will collect, record, consult and generally process your personal data, such as name, surname, address, telephone number, e-mail address, bank and payment details, qualifications, leave of absence, education, data on health issues as well as special categories of data and data relating to criminal convictions and offences, only insofar as necessary for and justified by the performance of your employment contract.

GPS will also process personal data of family members of the Employee, such as name, surname, address, telephone number, e-mail address, bank and payment details in order to conduct expatriation and/or repatriation procedures for the Employee and his/her family members and to notify family members in cases of emergency or transfer to them money when due.

Data are collected from the Employee or acquired from third parties at the time of the conclusion of the employment contract and during the course of the employment.

You are intended to be deployed to perform work for and within the organization of another Company, which will process your personal data as independent data controller. The scope and objectives of the processing of your personal data by that other Company will be governed by the letter of deployment and the data protection notices and internal regulations of that Company. This notice will apply by default where and with the appropriate modifications insofar as any issue is not covered by the data protection notice of that other Company.

When deployed to that other Company, you may be assigned to a work location where a video surveillance system is installed. The video surveillance system consists of cameras equipped with an application that exploits artificial

intelligence technology, which makes it possible to report, in real time, to the person in charge of safety, behaviors, held by Employees, that do not comply with the standards placed to protect health and safety in the workplace. The personal data thus collected are anonymized upon receipt of the images and in any case within a minimum time frame.

In order to enable the operation of the automatic safety anomaly recognition system, a model is prepared using training elements constituting images (e.g., with squares drawn on the safety harness so that the model can learn to recognize the same harness). Once trained, the model will be validated against a new, previously unused dataset to evaluate its performance.

Processing will be carried out in digital and/or paper form, with methods and tools designed to ensure maximum security and confidentiality, by individuals specifically appointed for this purpose, as well as an adequate level of accuracy, robustness, and cybersecurity of the systems in accordance with the best practice.

The Company you will be deployed to may have in place a system to **control physical access through video** surveillance systems, where installed, in order to guarantee the safety of people and property.

That Company you will be deployed to may also have in place a system to **control physical access** and exit to and from that Company's offices and work sites **through a badge** in order to guarantee the safety of people and property, or through a system of biometrical data if justified by special safety considerations.

 Purpose of the processing	 Legal basis of the processing	 Retention period of data
1. Personnel administration, exercising rights and fulfilment of obligations arising from the employment contract.	The processing of personal data is lawful because it is necessary for the execution of the employment contract, including the Organisation and Management Model 231 and the GPS Code of Ethics (art. 6 para. 1 lit. (b) GDPR), to comply with the legal obligations to which the Controller is subject (art. 6 para. 1 lit. (c) GDPR), and for the purposes of the legitimate interests of GPS to assert or defend its rights, reputation and property or those of a third party whose interests GPS is obligated to guard (art. 6 para. 1 lit. (f) GDPR).	Personal data will generally be kept for 10 years from the date of their collection or last processing, except where legal requirements, the nature of the data or their possible use for determining the rights and obligations of the parties justify a retention for up to 5 years. Where data may be relevant for any likely claims of or against the Company after that period, the data may be retained until the end of the prescription period and for the duration of the initiation or knowledge of the initiation of any possible legal action, plus the duration of any litigation or arbitration until final and binding adjudication or until settlement in full. GPS may retain the personal data relevant for employment related diseases or bodily damages for a retention period of up to 20 years after the termination of the employment contract, or for the maximum of the practically relevant and scientifically recognised latency

		periods if longer, plus an appropriate additional period as set forth in the preceding paragraph.
2. Fulfilment of regulatory obligations (<i>e.g.</i> , the obligations of the Controller with regard to whistleblowing).	The processing of personal data is lawful because it is necessary to comply with the legal obligations to which the Controller is subject (art. 6 para. 1 lit. (c) GDPR), and for the purposes of the legitimate interests of GPS to assert or defend its rights or those of a third party whose interests GPS is obligated to guard (art. 6 para. 1 lit. (f) GDPR). The processing of special categories of particularly sensitive personal data is lawful because it is necessary to fulfil the obligations and exercise the rights of the Controller or Employee in the field of labor law (art. 9. para. 2 lit. (b) GDPR).	Personal data will at least be retained for the period during which the Company may face negative consequences if it were not able to use these personal data as evidence.
3. Fulfillment of regulatory obligations regarding health and safety at work.	The processing of personal data is lawful because it is necessary to comply with the legal obligations to which the Controller is subject (art. 6 para. 1 lit. (c) GDPR), in order to protect the vital interests of the Employee or of another natural person (art. 6 para. 1 lit. (d) GDPR) and for the purposes of the legitimate interests of GPS to defend its rights, reputation and property or those of a third party whose interests GPS is obligated to guard (art. 6 para. 1 lit. (f) GDPR). The processing of special categories of particularly sensitive personal data is lawful because it is necessary for purposes of preventive medicine or occupational medicine, and for the assessment of the Employee's ability to work by a competent health professional (art. 9 para. 2 lit. (h) GDPR).	Personal data will at least be retained for the period during which the Company may face negative consequences if it were not able to use these personal data as evidence.
4. Control of physical access and exit - through a badge - to and from the Company offices and work sites in order to guarantee the safety of people and property.	The processing of personal data is lawful because it is necessary to comply with the legal obligations to which GPS is subject (art. 6 para. 1 lit. (c) GDPR) and for the purposes of the legitimate interests of GPS to assert or defend its rights, reputation and	Personal data relating to access control by badge will be stored for a period of 5 years.

	property and those of a third party whose interests GPS is obligated to guard (art. 6 para. 1 lit. (f) GDPR).	
5. Control of physical access through video surveillance systems, where installed, in order to guarantee the safety of people and property.	The lawfulness of processing is the compliance with a legal obligation (art. 6 para 1 lit. (f) GDPR) and the legitimate interest of GPS as the data controller (art. 6 para 1 lit. (f) GDPR). The processing of special categories of particularly sensitive personal data is lawful because it is necessary to fulfil the obligations and exercise the rights of the Controller or Employee in the field of labor law (art. 9. para. 2 lit. (b) GDPR), and to protect the vital interests of the data subject or of another natural person where the Employee is physically or legally incapable of giving consent (art. 9. para. 2 lit. (c) GDPR). The Employee will be informed about the positioning, scope and objective of recording of the video surveillance systems.	Personal data relating to access control by video or use of biometrical data will generally not be stored for a period longer than seven days, unless specific circumstances require or justify a longer retention. Video recordings will be stored under special security measures which prevent any use not permitted by applicable law.
6. Retention and use of your personal data for asserting of 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 the purposes of the legitimate interests of GPS to assert or defend its rights, reputation and property and those of a third party whose interests GPS is obligated to guard (art. 6 para. 1 lit. (f) GDPR). The processing of special categories of particularly sensitive personal data is lawful because it is necessary to establish, exercise or defend the rights of GPS in court or arbitral for administrative proceedings (art. 9 para. 2 lit. (f) GDPR).	Where data are or where there are specific indications that data may be relevant for any claims of or against the Company, the data may be retained until the end of the prescription period and for the duration of the initiation or knowledge of the initiation of any possible legal action before any state court, arbitral tribunal or administrative authority, plus the duration of such legal action until final and binding adjudication or until settlement in full.
7. Management of emergency situations affecting the Employee, including immediately notifying family members if the Employee cannot do it independently.	The processing of personal data is lawful because it is necessary to comply with the legal obligations to which GPS is subject (art. 6 para. 1 lit. (c) GDPR) and for the purposes of the legitimate interests of GPS in managing emergency situations that may involve its Employees (art. 6 para. 1 lit. (f) GDPR). The processing of special categories of particularly sensitive personal data is necessary	Personal data relating to the Employee's family members will be kept for the duration of the employment relationship, but may be retained for a longer period if necessary for the purposes of the legitimate interests of GPS.

	to protect the vital interests of the Employee or of another natural person where the Employee is physically or legally incapable of giving consent (art. 9 para. 2 lit (c) GDPR).	
8. Archiving of Company e-mail messages.	The processing of personal data is lawful for the purposes of the legitimate interest of GPS in having documentary evidence and/or proof in order to assert claims or defend its rights, interests and property in the event of any disputes with suppliers and/or costumers (art. 6 para 1 lit (h) GDPR).	Personal data will be stored for 15 years from the date of sending/receiving each corporate message, unless there is a legitimate interest to keep them longer.
9. Data mining activities to improve work processes.	The processing of personal data is lawful because it is necessary for the purposes of the legitimate interests to improve work processes and to optimize its operational processes according to a "data driven" logic (art. 6 para. 1 lit. (f) GDPR).	Personal data retained for data mining purposes will be processed for the time period during which it is relevant for optimizing GPS's operational processes.
10. IT security management, including log management in order to detect malicious access and behavior.	The processing of personal data is lawful because it is necessary to comply with a legal obligation to which GPS is subject (art. 6 para. 1 lit. (c) GDPR) and for the purposes of the legitimate interests pursued by GPS in preserving the integrity of its IT system (art. 6 para. 1 lit. (f) GDPR).	Personal data related to IT security management, in particular log management data, will be retained for a period of 6 months from their recording. During the period of lawful retention, the data will be retained in accordance with standard data security, storage and backup procedures.
11. In case you are assigned to a work location where a video surveillance system is installed in the workplace, whereby indicated by the specific signs showing the presence of the cameras: ➤ Guarantee the health and safety of workers and of whom, in various capacities, attend critical workplaces.	The legal basis that legitimizes the processing of personal data for the stated purposes is the legitimate interest of the Data Controller, pursuant to Art. 6(1)(f) GDPR, in order to ensure a high level of safety in critical workplaces to protect the lives and physical integrity of workers and of whom, in various capacities, attend critical workplaces.	Video recordings will be stored for 24 hours after recording, unless specific circumstances justify a longer recording.

➤ Analysis and internal investigation related to the events reported by the video surveillance system in terms of safety at critical workplaces. ➤ Training of artificial intelligence algorithms to allow detection of unsafe conditions.		In case of a "safe/unsafe" report, anonymized frames recorded by video surveillance cameras shall be retained for 30 days or any longer period justified by specific circumstances. Frames will not be anonymized if relevant because of the behaviour of individual Employees. Anonymized frames recorded by video surveillance cameras can be retained for 3 months after image detection.
Once the retention period has elapsed the data will be destroyed or made anonymous in accordance with GPS' standard erasure and backup procedures.		
 Way of processing and provision of data The processing of personal data will be carried out on digital, paper and other media, using methods and tools that are appropriate with regard to the state of the art, the nature and the extent of the data processing and the risk of the processing for the Employee's personality or fundamental rights, so as to comply with the protection regulations, in particular those regarding security and confidentiality, by persons chosen, instructed and supervised so that they are able to guarantee compliance with the employment contract, this Information Notice, and the applicable data protection regulations. Where the processing of your personal data and those of your family members is necessary for the commencement and continuation of the employment relationship, in particular for the performance of the employment contract and for compliance with legal obligations, a refusal to provide these data may make it impossible to commence or continue working for the Company. Where the processing of personal data is necessary for the fulfillment of certain post-termination obligations of GPS, in particular to fulfill legal obligations, a refusal of processing of certain data or restriction of disclosure to third parties will make it impossible for GPS to fulfill certain obligations towards you or in your favour.		
 Recipients and data transfer The Company may transfer personal data to other parties for the purposes set out above, for example: ▪ Other Saipem Group companies as data processors for GPS (including the Company for which the Employee will perform work) in order to carry out certain activities as part of the process of administering the employment; ▪ Third parties (e.g., consultants, IT service providers, payroll service and other agents, social security and insurance system operators, etc.), who carry out	 Data Subjects rights 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 data, restriction of processing in the cases provided for by art. 18 GDPR, as well as the right to object to any processing that does not comply 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, explicitly stating which	

certain activities and thereby process personal data on behalf of GPS as its data processors;

- Third parties (e.g., the Company for which the Employee performs work, insurance carriers, brokers, and other independent intermediaries) as independent data controllers, which determine the purposes and means of processing your personal data, including special categories of particularly sensitive personal data, based on their relationship with you;
- Administrative authorities, courts and arbitral tribunals to whom disclosure of personal data is required by law or necessary for the purposes of the legitimate interests of GPS or a third party. 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 purposes 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 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, by standard model clauses or on the basis of binding corporate rules.

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.

The right to update or supplement, as well as the right to rectify personal data cannot be exercised where the intrinsic nature of the data processed makes this unreasonable or practically impossible, such as images recorded in the course of video surveillance.

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 address privacygps@saipem.com. You can also write to GPS at the address given in the letterhead above.

You are aware that a deletion, hand-over, restriction of processing or of disclosure to third parties or revocation of your consent for processing of your personal data may mean that you can no longer hold the position you currently hold, or that your employment with GPS must be terminated.

You also have the right to lodge a 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.

INFORMATION NOTICE ACKNOWLEDGEMENT

☐ I hereby acknowledge that I have read and understood the Information Notice on the processing of Personal Data of International Employees.

Date

Name

Signature

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