

#### **FORM Global Projects Services AG**

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

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



## Information notice regarding the processing of Visitors' Personal Data

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



#### **Data Controller**

Your data provided are processed by Global Projects Services AG, Uetlibergstrasse 134 a, 8045 Zürich Switzerland (GPS or Company) as Data Controller and the persons who process these data on GPS' behalf. E-mail address: privacygps@saipem.com



#### Personal Data Processed

This **Information Notice** on the Processing of Personal Data of Visitors (Information Notice) applies to all personal data that you provide or that are collected by or on behalf of GPS in connection with your visit to **the offices of GPS in Zurich**. Such data may be photo, name, and other identification data, copy of passport or ID card, review of correspondence between you, your employer or principal, and the Company.

Please note that all the personal data provided will be processed in accordance with the FDPA, in the version applicable, any ordinance, 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, and any other applicable legislation on data privacy. Therefore, the Company undertakes to process your 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 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 will collect, record and generally process your personal data relating to the access control.

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	Purposes of the processing	Legal basis of the processing	Retention period of data
1.	Control of physical access - through a badge or through ID control - to Company offices and yards in order to guarantee the safety of people and property.	The lawfulness of the processing is based on the need to comply with the legal obligations to which the Company is subject (art. 6 para. 1 lit. (c) GDPR) and the legitimate interest of the Company (art. 6 para. 1 lit. (f) GDPR).	Data relating to access control by badge will be stored for a period of 5 years.
2.	Fulfilment of regulatory obligations.	The lawfulness of the processing is based on the need to comply with the legal obligations to which the Company is subject.	Personal data will be stored for a period of 5 years.
3.	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 Company.	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

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	state court, arbitral tribunal or
	administrative authority, plus the
	duration of such legal action until
	final and binding adjudication or
	until settlement in full.

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 your data is necessary to access to the Company's premises. The processing of personal data needed to access control (by badge) will be carried out in digital form, through special software used by the Company.

A refusal to provide data will make it impossible to access the Company's premises.



### 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:

- Third parties (by way of indication, consultants, companies providing IT services, companies offering reception and concierge services, etc.), including those not located within the EU, who carry out outsourcing activities on behalf of GPS, 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. These subjects will process the data in their capacity as independent Data Controllers. Your data will not be subject to disclosure.

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



## Data Subjects rights

Data Subjects have the right to ask the Company for access to their personal data, rectification, deletion or portability of their personal data, 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 processing for reasons related to their particular situation, in cases of legitimate interest of the Data Controller. In addition, where applicable, Data Subjects may revoke their consent at any time with effect for the future.

Furthermore, the right to data portability cannot be exercised as the processing is carried out in pursuance of a legitimate interest of the Data Controller.

These rights can be exercised at any time, against the Company, by sending a specific request in writing to the e-mail address <a href="mailto:privacygps@saipem.com">privacygps@saipem.com</a>. You can also write to the company at the address given in letterhead above.

Data Subjects have also 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.

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(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.