




	Saipem Offshore Construction S.p.A. FORM		Doc. no. FORM-SOC-PRV-002-E	
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	INFORMATION NOTICE REGARDING THE PROCESSING OF EMPLOYEES AND THEIR FAMILIES' PERSONAL DATA IN ACCORDANCE WITH ARTT. 13 AND 14 OF REGULATION (UE) 2016/679 ("GDPR")		Page 1 of 5	
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INFORMATION NOTICE REGARDING THE PROCESSING OF EMPLOYEES AND THEIR FAMILIES' PERSONAL DATA IN ACCORDANCE WITH ARTT. 13 AND 14 OF REGULATION (UE) 2016/679 ("GDPR")

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

	Data Controller				
<p>The data provided are processed by Saipem Offshore Construction S.p.A., Via Luigi Russolo, 5, 20138 Milano (MI), Italia. E-mail address: PrivacySOC@saipem.com ("Company" or "Controller")</p>					
	Personal Data Processed and source of data				
<p>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.</p> <p>In particular, the Company will collect, record, consult and generally process your and of your families personal data – as per your instruction – and identifying data (as for example name, surname, address, telephone number, e-mail address, bank and payment details) as well as special categories of data and data relating to criminal convictions and offences referred exclusively to you.</p> <p>Data are collected from the data subject at the time of the conclusion of the employment contract or, during the course of the employment contract, acquired by third parties (e.g. Italian Tax authority, CAF, registered professional, INPS etc).</p>					
	Purposes of the processing		Legal basis of the processing		Retention period of data
1. Personnel administration and management.	The lawfulness of processing for common data is the execution of the contract to which the Data Subject is a party. Instead, the lawfulness of processing for data relating to criminal convictions and offences is the compliance with the Provisions of Model 231 (including the Code of Ethics).	Personal data will be kept for 10 years from the termination of the employment relationship, except for the need to extend the retention period for the duration of any litigation until completion of the terms of implementation outlined in legal remedies.			
2. Fulfilment of regulatory obligations regarding health and safety at work.	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. With regard to special categories of data the processing is necessary for purposes of preventive medicine or occupational medicine and for the assessment of the employee's ability to work pursuant to art. 9, paragraph 2, lett. h of GDPR.	However, in view of the risk of occupational diseases with a latency period of at least 40 years, the retention of personal data shall take into account the abovementioned scientifically recognised latency period.			

3. Fulfilment of regulatory obligations (such as, by way of example and without limitation, the obligations of the Controller with regard to whistleblowing).	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. With regard to special categories of data to fulfil the obligations or to exercise the rights of the Controller or data subject in the field of labor law (ex art. 9.2, lett. b) GDPR). The lawfulness of processing for data relating to criminal convictions and offences is the compliance with the Provisions of Model 231 (including the Code of Ethics).	Personal data will be processed for the time strictly necessary to fulfil the purposes, in accordance with the terms of the law.
4. 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 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.
5. 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 collect through the video surveillance system will be stored for a period of 7 days, at the expiry of which, the images will be automatically overwritten.
6. Management of emergency situations affecting employees.	The lawfulness of processing is the legitimate interest of the Data Controller in managing emergency situations that may involve the employee, by immediately notifying family members if the employee can't do it independently.	Personal data of the Company's employee's family member will be kept for the duration of the employment relationship.
7. Archiving of Company e-mail messages.	The lawfulness of processing is the legitimate interest of the Data Controller in having documentary evidence and/or proof in order to exercise the right of defence and judicial protection in the event of any disputes with suppliers and/or customers.	Personal data will be stored for 15 years from the date of sending/receiving each corporate message.
8. Facilitate the execution of maintenance operations and/or inspections from a remote location.	The lawfulness of processing is the legitimate interest of the Data Controller.	Personal data will be stored for 10 years after the videos have been archived.
9. Data mining activities to improve work process.	The lawfulness of processing is the legitimate interest of the Data Controller in optimising its operational processes according to a "data driven" logic.	For the purpose set out in point 9 and 10, personal data will be processed for the time strictly necessary to fulfil the purposes.



10. IT security management, including log management in order to detect malicious access and behavior.	The lawfulness of processing is the legitimate interest of the Data Controller to protect the security of the Company's information assets.	With regard to log management, referred to in point 10, is foreseen a retention period of 6 months from their recording.
11. Participation in training and information events.	The lawfulness of processing is the execution of the contract to which the Data Subject is a party.	Personal data will be kept for the duration of the employment relationship.
12. 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. With regard to special categories of data the lawfulness of processing is to establish, exercise or defend the rights in court pursuant to art. 9. paragraph 2, lett. f of GDPR).	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 <p>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.</p> <p>The provision of your data and those of your family members is necessary for the conclusion of the employment contract with you and related activities as well as to fulfill legal obligations. A refusal to provide data will make it impossible to establish or continue the employment relationship and to take advantage of services and initiatives aimed at employees.</p>		
 Recipients and data transfer <p>The Company - without needing specific consent - may communicate personal data to other subjects, the categories of which are described in detail below, for example:</p> <ul style="list-style-type: none">▪ 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 control and personnel management activities;▪ Third parties (by way of indication, consultants, companies providing IT services, payroll companies), 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		 Data Subjects rights <p>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.</p> <p>With regard to recorded images, in accordance with the Provisions of the Data Protection Authority in the field of video surveillance, the right to update or supplement, as well as the right to rectification cannot be exercised in practice in view of the intrinsic nature of the data processed.</p> <p>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.</p>

<p>European Commission or on the basis of standard contractual clauses;</p> <ul style="list-style-type: none"> Judicial authorities, insurance companies for the provision of insurance services, as well as those subjects to whom communication is required by law or contract. These subjects will process the data in their capacity as independent Data Controllers. <p>Your data will not be subject to disclosure.</p>	<p>These rights can be exercised at any time, against the Controller, by sending a specific request in writing to the e-mail addresses privacySOC@saipem.com.</p> <p>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.</p>
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