







**PRIVACY NOTICE REGARDING THE RECORD OF TRAINING SESSIONS IN ACCORDANCE WITH ART. 13 OF REGULATION (UE) 2016/679 ("GDPR")**

<div></div> <div><b>Data Controller</b></div> <div>The data provided are processed by Saipem S.p.A. Via Luigi Russolo, 5 20138 Milan - Italy. E-mail address: <a href="mailto:privacy@saipem.com">privacy@saipem.com</a> (“Company” or “Controller”).</div>	<div></div> <div><b>Data Protection Officer (DPO)</b></div> <div>The DPO can be contacted at: <a href="mailto:dpo@saipem.com">dpo@saipem.com</a>.</div>	
<div><div></div><div><b>Personal Data Processed</b></div></div> <div>Please note that all the personal data provided will be processed in accordance with current legislation on privacy. Therefore, the Company undertakes to process the personal data in accordance with the principles of fairness, lawfulness and transparency, in compliance with the purposes set out below, collecting personal data only for specified and necessary purposes. Only authorised and properly trained personnel will be allowed to use the personal data in order to guarantee the necessary confidentiality of the information provided.</div> <div>In detail, the Company collects, records and generally processes the following personal data collected from the data subject: name, surname, image, voice, any recorded statements/speech.</div>		
<div></div> <div><b>Purposes of the processing</b></div>	<div></div> <div><b>Legal basis of the processing</b></div>	<div></div> <div><b>Retention period of data</b></div>
<div>1. To document and archive the contents of training activities addressed to Data Controller’s employees, partners, customers, coworkers, visitors, suppliers and stakeholders.</div> <div>2. To provide participants and other employees with deferred access to the recordings.</div> <div>3. To improve the quality and effectiveness of training activities.</div> <div>4. Cost reduction through the reuse of previously recorded training sessions.</div>	<div>The legal basis of the processing is the Data Controller’s legitimate interest in efficiently managing internal training activities.</div>	<div>Personal data will be stored for a period of 36 months from the date of recording, unless otherwise specified for training purposes and optimize costs related to the repeatability of the training activities.</div>
<div>5. Keep a history of significant training activities.</div>	<div>The legal basis of the processing is the Data Controller’s legitimate interest in protecting and enhancing its historical documentary heritage.</div>	<div>Personal data will be stored in the historical archive for 20 years following the dissolution of the Company.</div>
<div>After the abovementioned retention periods, your personal data will be permanently deleted in a secure manner.</div>		



#### Way of processing and provision of data

The recordings will be made using electronic tools and stored in secure digital archives, with access limited to authorized personnel only. There is no automatic use of images or voices for profiling.

The provision of personal data is optional; but it may be necessary to participate in the training activities. If applicable, participants may request alternative non-recorded participation methods.



#### Recipients and Data transfer

Personal data may be disclosed, without requiring your specific consent, to the categories of recipients listed below, including but not limited to:

- Data Controller's authorised personnel;
- other group companies, if involved in the training activities;
- IT service providers and e-learning platform, acting as data processors pursuant to article 28 of the GDPR.

To find out the complete and updated list of data processors appointed by the Data Controller, the data subject can submit a request using the contact details provided by the Data Controller.



#### Transfer of data to countries outside the European Union

The processed personal data is not transferred outside the European Union.



#### Data subjects' rights

The data subject has the right to exercise the rights recognized by articles 15-22 of the GDPR, including: access to personal data, erasure, restriction in the cases provided for by art. 17 and 18 GDPR.

The right to rectification cannot be exercised in practice in view of the intrinsic nature of the processed data. Furthermore, the right to data portability cannot be exercised as the processing is carried out on the basis of the Data Controller's legitimate interest.

The right to object may be exercised in the cases provided for under Article 21 of the GDPR and is subject to limitations in the presence of specific circumstances, including but not limited to:

- compliance with legal obligations regarding training;
- the need to verify the data subject's actual active participation;
- educational needs, where the trainer deems it appropriate to use video cameras to encourage the data subject's engagement.

These rights can be exercised at any time by submitting a written request at the following e-mail addresses [dpo@saipem.com](mailto:dpo@saipem.com) or [privacy@saipem.com](mailto: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.