

**PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA COLLECTED VIA VIDEO SURVEILLANCE
IN ACCORDANCE WITH ART. 13 OF REGULATION (UE) 2016/679 ("GDPR")**


Data Controller

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")


Personal Data Processed

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.

In particular, the Company will collect, record and generally process the following personal data collected from the data subject: images detected by video surveillance systems.


Purposes of the processing

Legal basis of the processing

Retention period of data

1. Controlling physical access through video surveillance systems in order to guarantee the safety of individuals and the protection of company assets.

The lawfulness of the processing is based on the Data Controller's legitimate interest in ensuring the safety of individuals and the protection of company assets.

In accordance with applicable regulations, the personal data collected by the video surveillance system will be stored for a period of 7 days, after which it will be automatically overwritten.

A longer retention period may be applied, only upon request, by judicial authorities or delegated bodies in relation to ongoing investigations.

2. If necessary, to assert or defend the right of the Company in court or in arbitration and conciliation procedures.

The lawfulness of processing is based on the Data Controller's legitimate interest in protecting its rights.

For the entire duration of the legal disputes, until completion of the terms of implementation outlined in legal remedies.

Once the retention period has elapsed the data will be deleted.



Way of processing and provision of data

The video surveillance system detects and records images 24 hours a day, 7 days a week and is equipped with a fixed-angle frame that cannot be modified remotely.

The processing will be carried out in digital form, with methods and tools designed to ensure the highest levels of security and confidentiality, by persons specifically appointed for this purpose.

The provision of personal data is necessary to access the company premises subject to video surveillance. Failure to provide such data will result in the impossibility to access the areas pertaining to the Data Controller.

The areas under registration are clearly marked with appropriate information plaques on site. This notice integrates the concise information provided on the information plaques.



Recipients and Data transfer

The Company — without the need to obtain your specific consent — may communicate your personal data to the categories of recipients listed below, including but not limited to:

- third parties (such as IT service providers, companies providing reception and concierge services, companies responsible for the maintenance of video surveillance systems), that carry out outsourced activities on behalf of the Data Controller, in their capacity as data processors appointed pursuant to art. 28 GDPR. These entities are required to comply with the data protection obligations and implement appropriate technical and organizational measures to ensure the confidentiality and security of the data.
- Judicial authorities which, only upon formal request, will process personal data in their capacity as independent data controllers.

Your data will not be subject to disclosure.

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

Data Subjects have the right to request from the Controller access to their personal data, as well as erasure, restriction and objection to processing in the cases provided for by articles 17, 18 and 21 GDPR.

With regard to recorded images, in accordance with the Provisions of the Italian Data Protection Authority concerning video surveillance, the right to rectification, updating or integration 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.

These rights can be exercised at any time by submitting a written request at the following e-mail address PrivacySOC@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.