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	INFORMATION NOTICE REGARDING THE PROCESSING OF CLIENTS' PERSONAL DATA IN ACCORDANCE WITH THE SWISS FEDERAL DATA PROTECTION ACT (FDPA) AND REGULATION (UE) 2016/679 (GDPR)		Rev. 01	Date 25/06/2026
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INFORMATION NOTICE REGARDING THE PROCESSING OF CLIENTS' 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 Clients

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.

The contact point within GPS for (i) individuals acting on behalf, or representing the Client(s) who want to exercise their rights under the Federal Data Protection Act (FDPA) and any other data protection laws that may be applicable, in particular the European General Data Protection Regulation (GDPR), and (ii) the Federal Data Protection and Information Commissioner (FDPIC) and any other data protection authorities competent for the data processing done by the Company, can be contacted under privacygps@saipem.com.



Personal Data Processed

This Information Notice regarding the Processing of Personal Data of Clients (**Information Notice**) applies to the personal data of individuals acting on behalf, or representing the Client, including but not limited to, legal representatives, employees and advisors of the Client with whom the Company intends to enter or has entered into the agreement. Specifically, the personal data processed by the Company will be the common data (e.g. name, surname, telephone number or e-mail).

Please note that all of the personal data will be processed in accordance with the FDPA, in the version applicable and any ordinances, 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.

The Company will collect, record, consult and generally process the abovementioned. personal data and undertakes to process these 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 your data. Personal data may also be collected from public open sources.



Purpose of the processing



Legal basis of the processing



Retention period of data

1. Performance of activities preliminary to the establishment of the contractual relationship with the Client

The processing of personal data is lawful because it is necessary for the execution of pre-contractual measures (art. 6 para. 1 lit. (b) GDPR).

2. Management of the contractual relationship with the Client

The processing of personal data is lawful because of the execution of contractual measures to which the data subject is a party (art. 6 para. 1 lit. (b) GDPR).

3. Fulfilment of legal obligations

The processing of personal data is lawful because it is necessary for compliance with a legal obligation to which the GPS is subject (art. 6 para. 1 lit. (c) GDPR).

Personal data will be stored for a maximum of 10 years after concluding the completion of the agreement, except for the need to extend the retention period for the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies.

4. Asserting 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 compliance with legal obligations to which GPS as data controller is subject (art. 6 para. 1 lit. (c) GDPR), and for the purposes of the legitimate interest pursued by GPS to assert or defend a right or claim of or against the Company in judicial, arbitration, conciliation, criminal or administrative proceedings (art. 6 para. 1 lit. (f) GDPR).	Longer retention periods apply if GPS is under a legal requirement or has a legitimate interest in retaining certain data for longer periods, in particular for the purposes set out below. Specifically, personal data can be retained for as long as necessary, exceeding the standard retention of 10 years, in relation to the circumstances described below: (i) in cases in which a claim has been asserted or appears likely to be asserted by or against GPS for which personal data may become relevant; or (ii) for the purposes of legitimate interests pursued by GPS or by a third party Personal data retained for the assertion of or defense against a right or claim of or against GPS may be retained in general until the end of the term of legally prescribed period of the respective claim, plus an additional period for instituting, submitting or receiving a claim, pre-procedural negotiations and/or the duration of any possible litigation and arbitration until final and binding adjudication or of any negotiations in view of settlement until settlement in full, which will normally not exceed 11 years. After the normal retention period of abovementioned, access to the personal data will be restricted in order to make sure that they are processed exclusively for the purposes that justify their longer retention. During the period of lawful retention, the data will be retained in accordance with standard data security, storage and backup procedures.
Once the period of lawful retention has elapsed, the data will be erased or made anonymous in accordance with standard data erasure and anonymization procedures compatibly with normal technical and routine 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 aimed at ensuring maximum security and confidentiality, by persons specifically appointed and qualified for this purpose.

The processing of the aforementioned data is necessary for managing the above purposes; therefore, refusing to allow processing will make it impossible to establish an agreement.



Recipients and data transfer

The Company may transfer your personal data to other parties for the purposes set out above, for example:

- 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 contract management activities;
- Third parties (e.g., consultants, IT service providers, recruiting agents, etc.), which carry out certain activities and thereby process personal data on behalf of GPS as its (direct or indirect) data processors;
- Administrative authorities, courts and arbitral tribunals, auditors, insurances etc., to whom disclosure of personal data is required by law or necessary for the purposes of the legitimate interests of GPS. These subjects will process the data in their capacity as independent data controllers.

Personal data may be transferred to third parties anywhere in the world, also to any country where no other Saipem Group Company is present, 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 purpose for which GPS cannot process them.

Personal data will only be transferred to countries outside Switzerland and the EU only if data privacy is guaranteed by adequacy decisions by the Federal Council (or the European Commission under the GDPR), or by data protection provisions of a contract between the controller or the processor and its contracting party, or by standard model clauses, or by binding corporate rules.



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 is not in compliance 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, stating explicitly which 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.

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

You are aware that a deletion, hand-over in a portable

You also have the right to lodge a report or 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.

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