

PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF CORPORATE INFORMATION AND CHANGE MANAGEMENT AND ENGAGEMENT INITIATIVES IN ACCORDANCE WITH ART. 13 OF REGULATION (UE) 2016/679 ("GDPR")

 Data Controller	 Data Protection Officer (DPO)	
The data provided are processed by Saipem S.p.A. Via Luigi Russolo, 5 20138 Milan - Italy. E-mail address: privacy@saipem.com (“Company” or “Controller”).	The DPO can be contacted at: dpo@saipem.com.	
 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. Specifically, the Company processes the following personal data collected from the data subject: name, surname, corporate e-mail address, engagement data related to the communication received as part of the change management initiative, and any potential additional data specified therein.		
 Purposes of the processing	 Legal basis of the processing	 Retention period of data
The purpose of the processing is to provide corporate information and send communications related to change management and engagement corporate initiatives.	The legal basis for the processing is the execution of a contract for communications strictly related to the contractual and commercial relationship with the Company and, for all other communications, the Controller’s legitimate interest in providing corporate information and promoting change management and engagement initiatives, aimed at fostering greater involvement from recipients.	Identification and contact data (name, surname and corporate e-mail address) used to send the communication will be retained in accordance with the retention periods applicable to the purposes for which the data were originally collected, as set out in the relevant privacy notices.
The purpose of the processing is to send newsletters relating to information, updates, events and initiatives of interest to the Company and its stakeholders, organised either by the Company or by third parties, for which the data subject requested to subscribe.	The legal basis for the processing is the data subject’s consent, provided upon subscribing to the newsletter.	Identification and contact data will be retained for the duration of the subscription to the mailing list and will be deleted following the withdrawal of consent or the data subject's request to unsubscribe.

The purpose of the processing is to process recipients' engagement with corporate information and communication sent as part of the change management and engagement initiatives.	The legal basis for the processing is the Controller's legitimate interest in evaluating and improving the effectiveness of its communication, with the aim of increasing engagement and commitment from data subjects.	Engagement data will be retained only for the duration of the related initiative, which may last between 6 and 18 months.
The purpose of the processing is the organisation and management of activities, participation in which is voluntary, as part of corporate information and change management and engagement initiatives.	The legal basis of the processing is the performance of a contract, which is entered into by participants upon joining the activity, after being informed about its terms and how it will be conducted.	Data related to the activity will be deleted once the purpose of the activity has been fulfilled. After this period, such data may be retained in an aggregate format for analytical or reporting purposes.
Once the retention period has elapsed the data will be deleted. Engagement data, specifically, will be automatically deleted within 20 days from the end of the retention period.		
 Methods of Processing, Source and Provision of Data Data is processed in digital form with appropriate security and confidentiality measures by personnel specifically authorised and trained for this purpose. The personal data is collected directly from the data subject. Identification and contact data was previously collected in the context of an existing relationship, as described in the relevant notices available at https://www.saipem.com/en/privacy and in the Intranet. The provision of personal data related to the activity is optional; however, it is necessary in order to participate in such activities.		
 Recipients and Data transfer Within the purposes listed above, personal data may be disclosed to third parties performing outsourced activities on behalf of the Controller – such as supporting the management of the activities or providing platforms in the context of the activities and/or the collection of engagement data – in their capacity as data processors under art. 28 GDPR, as well as to third parties acting as autonomous data controller. 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. 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.	 Data subjects' rights Data Subjects have the right to request from the Controller access to their personal data, as well as rectification, erasure, restriction and objection to processing in the cases provided for by articles 17, 18 and 21 GDPR. Furthermore, where applicable, data subjects may withdraw their consent at any time. Withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal. The right to data portability cannot be exercised when the processing is carried out on the basis of the Data Controller's legitimate interest. Where processing is based on legitimate interests, data subjects may exercise their right to object in accordance with the GDPR by providing grounds relating to their particular situation. Saipem will assess the circumstances described by the data subject and	

**Transfer of data to countries outside the European Economic Area**

Personal data described in the notice is not transferred outside the European Economic Area.

determine whether they override its legitimate interests in carrying out the processing. If the objection is upheld and no compelling legitimate grounds exist to continue the processing, Saipem will stop processing the personal data on that basis. If the objection is not upheld, Saipem will provide the data subject with a reasoned explanation of its decision.

These rights can be exercised at any time by submitting a written request at the following e-mail addresses dpo@saipem.com or 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.