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|  | FORM Global Projects Services AG                                                                                                                                                                                     |  | Doc. no. FORM-GPS-PRV-011-E    |                 |
|                                                                                   | <b>INFORMATION NOTICE REGARDING THE<br/>PROCESSING OF INTERNATIONAL<br/>EMPLOYEES' PERSONAL DATA IN<br/>ACCORDANCE WITH THE SWISS FEDERAL<br/>DATA PROTECTION ACT (FDPA) AND<br/>REGULATION (UE) 2016/679 (GDPR)</b> |  | Rev. 03                        | Date 25/08/2026 |
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# **INFORMATION NOTICE REGARDING THE PROCESSING OF INTERNATIONAL EMPLOYEES' 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 International Employees**  
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.

Employees who want to exercise their rights under the Federal Data Protection Act (**FDPA**) and any other applicable data protection laws, in particular the European General Data Protection Regulation (**GDPR**), the Federal Data Protection and Information Commissioner (**FDPIC**) and any other data protection authorities competent for the data processing by the Company, may contact GPS under [privacygps@saipem.com](mailto:privacygps@saipem.com).



### **Personal Data Processed**

This Information Notice regarding the Processing of Personal Data of International Employees (**Information Notice**) applies to all personal data that you - as Employee of GPS to be deployed to companies outside Switzerland (**you** or **Employee**) - provide or that are collected by or on behalf of GPS in connection with your employment relationship with GPS. For the avoidance of doubt, it does not apply to any data processed for the purposes of and in relation to taxes, pension plans, social security or insurance contracts, declarations, terms applicable to them or any change thereof, information or communication relating to them, or payments made or received in relation to them, even if the Company was involved therein.

All your personal data will be processed in accordance with the FDPA, as amended, and any ordinances, guidelines and fact sheets issued thereunder by the FDPIC or any other competent public authority, and any other data protection laws and regulations that may be applicable, in particular the GDPR. The Company undertakes to process your personal 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 said data.

Since the onboarding phase, the Company will collect, record, consult and generally process your personal data, such as name, surname, address, telephone number, e-mail address, bank and payment details, qualifications, leave of absence, education, only insofar as necessary for and justified by the performance of your employment contract.

Where relevant and to the extent permitted by applicable law, we collect also special categories of data such as health data (such as sickness records, fitness for work certificate) and, where necessary for compliance reasons, data relating to criminal convictions and offences.

Where required, GPS will also collect personal data about the Employee family members, such as name, surname, address, telephone number, e-mail address, bank and payment details in order to conduct expatriation and/or repatriation procedures for the Employee and his/her family members and to notify family members in cases of emergency or transfer to them money when due. Before providing GPS with any such information, the Employee must inform the relevant individuals that the Employee will disclose their Personal Data to GPS and provide a copy of the information in this Notice to them.

Data are collected from the Employee or acquired from third parties (including third parties acting on Employee's behalf) since the assignment offer, at the time of the signing of the employment contract and during the employment. Moreover, GPS may collect information from publicly available sources, such as credit bureaus, directorship databases, professional networking platforms, company websites, publicly accessible registries, and other publicly available information, where permitted by applicable data protection laws.

Your deployment is for you to perform work for and within the organization of other companies (i.e. other Saipem Group companies, Saipem's clients, etc.), which will process your personal data as independent data controller. The scope and objectives of the processing of your personal data by that other company will be governed by the letter of deployment and the data protection notices and internal regulations of that company. This notice will apply by default where and with the appropriate modifications insofar as any issue is not covered by the data protection notice of that other company.

When deployed to work (i) for other companies, or (ii) onboard a vessel whose vessel owner is a Saipem Group company or is chartered by a Saipem Group company, you may be assigned to a work location (physical site or vessel) where a video surveillance system is installed. The video surveillance system consists of cameras that may be equipped with an application that exploits artificial intelligence technology, which makes it possible to report, in real time, to the person in charge of safety, behaviors, held by employees, that do not comply with the standards placed to protect health and safety in the workplace. The personal data thus collected are anonymized upon receipt of the images and in any case within a minimum time frame.

In order to enable the operation of the automatic safety anomaly recognition system, a model is prepared using training elements constituting images (e.g., with squares drawn on the safety harness so that the model can learn to recognize the same harness). Once trained, the model will be validated against a new, previously unused dataset to evaluate its performance.

Processing will be carried out digitally, with methods and tools designed to ensure maximum security and confidentiality, by individuals specifically appointed for this purpose, as well as an adequate level of accuracy, robustness, and cybersecurity of the systems in accordance with the best data protection practice.

The other companies you will be deployed to, may have in place a system to **control physical access through video surveillance systems**, where installed, in order to guarantee the safety of people and property. Moreover, they may also have in place a system to **control physical access** to and exit from that company's offices and work sites **through a badge** in order to guarantee the safety of people and property, or through a biometrical data system if justified by special safety considerations.

In all cases abovementioned, more details regarding the purpose and the legal basis of the processing, as well as the retention period of the data, can be retrieved on site or onboard, by enquiring about the other company acting as independent data controller. A list of Saipem Group companies is available at [www.saipem.com](http://www.saipem.com)

|  <b>Purpose of the processing</b>         |  <b>Legal basis of the processing</b>                                                                                                                                                                                                                                                                                                                                                                                               |  <b>Retention period of data</b>                                                                                                                                                                                                                                                                                                                                                                                          |
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| 1. Onboarding (e.g., set up internal profiles, collecting information required to complete the employee onboarding process). | The processing of personal data is lawful because it is necessary for taking steps prior to the execution and performance of the employment contract, including the Organisation and Management Model 231 and the GPS Code of Ethics (art. 6 para. 1 lit. (b) GDPR), to comply with the legal obligations to which the Controller is subject (art. 6 para. 1 lit. (c) GDPR). With reference to the processing of special categories of particularly sensitive personal data, see the processing below no. 3 and no. 4. | Personal data will generally be kept for 10 years from the date of their collection or last processing. If a legal requirement, the nature of the data, or their possible use for determining the rights and obligations of the parties provide differently, retention will be up to 5 years.<br><br>Where data may be relevant for any likely claims of or against the Company after that period, the data may be retained until the end of the prescription period and for the duration of the initiation or |

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| 2. Personnel administration, exercising rights and fulfilment of obligations arising from the employment contract.                                                                                                                                        | The processing of personal data is lawful because it is necessary for the execution and performance of the employment contract, including the Organisation and Management Model 231 and the GPS Code of Ethics (art. 6 para. 1 lit. (b) GDPR), to comply with the legal obligations to which the Controller is subject (art. 6 para. 1 lit. (c) GDPR).                                                                                                                                                                                                                                                                                    | knowledge of the initiation of any possible legal action, plus the duration of any litigation or arbitration until final and binding adjudication or until settlement in full.<br><br>GPS may retain the personal data relevant for employment related diseases or bodily damages for a retention period of up to 20 years after the termination of the employment contract, or for the maximum of the practically relevant and scientifically recognised latency periods if longer, plus an appropriate additional period as set forth in the preceding paragraph. |
| 3. Fulfillment of regulatory obligations regarding health and safety at work.                                                                                                                                                                             | The processing of personal data is lawful because it is necessary to comply with the legal obligations to which the Controller is subject (art. 6 para. 1 lit. (c) GDPR), in order to protect the vital interests of the Employee or of another natural person (art. 6 para. 1 lit. (d) GDPR). The processing of special categories of particularly sensitive personal data is lawful because it is necessary for purposes of preventive medicine or occupational medicine, and for the assessment of the Employee's ability to work by a competent health professional (art. 9 para. 2 lit. (h) GDPR).                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|  <b>Purpose of the processing</b>                                                                                                                                      |  <b>Legal basis of the processing</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  <b>Retention period of data</b>                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4. Fulfilment of regulatory obligations (e.g., the obligations of the Controller regarding whistleblowing, pre-hiring checks, visa application process, and, where necessary for compliance reasons, data relating to criminal convictions and offences). | The processing of personal data is lawful because it is necessary to comply with the legal obligations to which the Controller is subject (art. 6 para. 1 lit. (c) GDPR). The processing of special categories of particularly sensitive personal data is lawful because it is necessary to fulfil the obligations and exercise the rights of the Controller or Employee in the field of labor law (art. 9. para. 2 lit. (b) GDPR) and, with regard to criminal convictions and offences, it is lawful because it is necessary to meet the visa requirements in certain countries where the Employee will ultimately work (art. 10 GDPR). | Personal data will be retained for the time strictly necessary to fulfil the purposes, in accordance with the terms of the law.                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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| 5. Retention and use of your personal data for asserting of 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 the purposes of the legitimate interests of GPS to assert or defend its rights, reputation and property and those of a third party whose interests GPS is obligated to guard (art. 6 para. 1 lit. (f) GDPR). The processing of special categories of particularly sensitive personal data is lawful because it is necessary to establish, exercise or defend the rights of GPS in court or arbitral for administrative proceedings (art. 9 para. 2 lit. (f) GDPR).                              | Data relevant, or reasonably believed to be relevant, to any claim by or against the Company may be retained until the applicable limitation period expires.<br><br>If legal proceedings before a court, arbitral tribunal or administrative authority are started or reasonably expected to begin, the data may also be retained until those proceedings are finally resolved or fully settled. |
|  Purpose of the processing                                                                                                                    |  Legal basis of the processing                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  Retention period of data                                                                                                                                                                                                                                                                                     |
| 6. Management of emergency situations affecting the Employee, including immediately notifying family members if the Employee cannot do it independently.                                                                       | The processing of personal data is lawful because it is necessary to comply with the legal obligations to which GPS is subject (art. 6 para. 1 lit. (c) GDPR), and in order to protect the vital interests of the Employee or of another natural person (art. 6 para. 1 lit. (d) GDPR). The processing of special categories of particularly sensitive personal data is necessary to protect the vital interests of the Employee or of another natural person where the Employee is physically or legally incapable of giving consent (art. 9 para. 2 lit. (c) GDPR). | Personal data relating to the Employee's family members will be kept for the duration of the employment relationship, or, if the management of the emergency situation lasts longer than the end of the employment relationship, until such emergency has concluded.                                                                                                                             |
| 7. Archiving Company e-mail messages.                                                                                                                                                                                          | The processing of personal data is lawful for the purposes of the legitimate interest of GPS in having documentary evidence and/or proof in order to assert claims or defend its rights, interests and property in the event of any disputes with suppliers and/or customers (art. 6 para. 1 lit. (f) GDPR).                                                                                                                                                                                                                                                          | Personal data will be stored for 15 years from the date of sending/receiving each corporate message, unless there is a legitimate interest in keeping them longer.                                                                                                                                                                                                                               |
| 8. Data mining activities to improve work processes.                                                                                                                                                                           | The processing of personal data is lawful because it is necessary for the purposes of the legitimate interests to improve work processes and to optimize its operational processes                                                                                                                                                                                                                                                                                                                                                                                    | Personal data retained for data mining purposes will be processed for the time period during which it is relevant for optimizing GPS's operational processes.                                                                                                                                                                                                                                    |

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| 9. IT security management, including log management in order to detect malicious access and behavior.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | The processing of personal data is lawful because it is necessary to comply with a legal obligation to which GPS is subject (art. 6 para. 1 lit. (c) GDPR) and for the purposes of the legitimate interests pursued by GPS in preserving the integrity of its IT system (art. 6 para. 1 lit. (f) GDPR). | <p>Personal data related to IT security management, in particular log management data, will be retained for a period of 6 months from their recording.</p> <p>During the period of lawful retention, the data will be retained in accordance with standard data security, storage and backup procedures.</p>                                                                                                                                                                                                                                                                                                                                                                                              |
| Once the retention period has elapsed, data will be destroyed or made anonymous in accordance with GPS' standard erasure and backup procedures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|  <b>Way of processing and provision of data</b> <p>Personal data will be processed by electronic, paper-based and other means, using methods and tools appropriate to the state of the art, the nature and scope of the processing, and the risks that the processing may pose to the Employee's personality rights and fundamental rights and freedoms. Such processing will be carried out in compliance with applicable data protection laws, in particular the requirements relating to security and confidentiality, by duly authorized, instructed and supervised personnel, so as to ensure compliance with the employment contract, this Information Notice and the applicable data protection regulations.</p> <p>Where the processing of your personal data and those of your family members is necessary for the commencement and continuation of the employment relationship, in particular for the performance of the employment contract and for compliance with legal obligations, a refusal to provide this data may make it impossible to commence or continue working for the Company.</p> <p>Where the processing of personal data is necessary for the fulfillment of certain post-termination obligations of GPS, in particular to fulfill legal obligations, a refusal of processing of certain data or restriction of disclosure to third parties will make it impossible for GPS to fulfill certain obligations towards you or in your favour.</p> |                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|  <b>Recipients and data transfer</b> <p>The Company may transfer personal data to other parties for the purposes set out above, for example:</p> <ul style="list-style-type: none"> <li>Other Saipem Group companies as data processors for GPS (including the Company for which the Employee will perform work) for the purpose of carrying out certain activities related to the administration of the employment relationship;</li> <li>Third parties (e.g., consultants, IT service providers, payroll service and other agents, social security and insurance system operators, etc.), who carry out</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                         |  <b>Data Subjects rights</b> <p>You have the right to ask GPS as the data controller for</p> <ul style="list-style-type: none"> <li>access to and obtain information about your personal data</li> <li>rectification of your personal data if data is incorrect or incomplete</li> <li>erasure of your personal data, receipt of your personal data in a structured, commonly used and machine-readable format (data portability), and restriction of processing in the cases provided for by Article 18 GDPR</li> <li>object to processing that does not comply with applicable law or, where permitted by</li> </ul> |

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| <p>certain activities and thereby process personal data on behalf of GPS as its data processors;</p> <ul style="list-style-type: none"> <li>Third parties (e.g., the Company for which the Employee performs work, insurance carriers, brokers, and other independent intermediaries) as independent data controllers, which determine the purposes and means of processing your personal data, including special categories of particularly sensitive personal data, based on their relationship with you;</li> <li>Third parties acting as independent data controllers, which determine the purposes and means of processing your personal data within merger and acquisition activities;</li> <li>Administrative authorities, courts and arbitral tribunals to whom disclosure of personal data is required by law or necessary for the purposes of the legitimate interests of GPS or a third party. These subjects will process the data in their capacity as independent data controllers.</li> </ul> <p>Personal data is transferred to third parties only subject to contractual or other legally binding obligations requiring the recipient to use the data solely for the specific purposes for which they were disclosed and to refrain from using the data for any other purpose not authorized by GPS or permitted under applicable data protection laws.</p> <p>GPS may transfer personal data to any country outside Switzerland where any other Saipem Group companies have their seat or registered office or any establishment, or anywhere in the world also to any country where no other Saipem Group Company is present.</p> <p>Personal data will be transferred to countries outside Switzerland and the EU only where an adequate level of data protection is guaranteed, either through an adequacy decisions of the Swiss Federal Council (or the European Commission under the GDPR), or through appropriate safeguards such as data protection provisions of a contract between the controller or the processor and the recipient, standard contractual clauses, or binding corporate rules.</p> <p>All employees accessing personal data must comply with the internal rules and policies to protect them and ensure their confidentiality. GPS and Saipem Group have implemented adequate technical and organisational measures to protect your Personal Data against unauthorized, accidental or unlawful destruction, loss,</p> | <p>law, to processing based on the legitimate interests of GPS or a third party; and request the restriction of disclosures to third parties that are not compliant with applicable law or this Information Notice;</p> <ul style="list-style-type: none"> <li>withdraw your consent, at any time, where the processing is based on your consent.</li> </ul> <p>The rights to update, supplement or rectify personal data shall not apply where, having regard to the nature of the personal data processed, their exercise would be unreasonable or practically impossible.</p> <p>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 address <a href="mailto:privacygps@saipem.com">privacygps@saipem.com</a>. You can also write to GPS at the address given in the letterhead above.</p> <p>Undue or excessively burdensome requests for the deletion, provision, restriction of processing or disclosure of personal data to third parties, or the withdrawal of your consent to the processing of your personal data during the employment, may result in you no longer being able to hold your current position, or may lead to a termination of your employment with GPS.</p> <p>You also have the right to lodge a 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.</p> |
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| alteration, misuse, disclosure or access and against all other unlawful forms of processing. |  |
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**INFORMATION NOTICE ACKNOWLEDGEMENT**

☐ I hereby acknowledge that I have read and understood the Information Notice on the processing of Personal Data of International Employees.

\_\_\_\_\_  
Date\_\_\_\_\_  
Name\_\_\_\_\_  
Signature

This Information Notice was updated in August 2026. The last updated version of this Information Notice will be made available on the GPS website at [www.gpsag.ch](http://www.gpsag.ch).