

PRIVACY NOTICE ON THE PROCESSING OF VISITOR'S PERSONAL DATA PURSUANT TO ART. 13 OF REGULATION (UE) 2016/679 ("GDPR")

 Data Controller Saipem S.p.A., Via Luigi Russolo, 5 20138 Milan – Italy, E-mail address: privacy@saipem.com (“Company” or “Controller”) acts as the data controller for the processing of your personal data.	 Data Protection Officer (DPO) The DPO can be contacted at: dpo@saipem.com	
 Personal Data Processed Please note that your personal data will be processed in compliance with applicable data protection laws. Therefore, the Company processes personal data in accordance with the principles of fairness, lawfulness and transparency, in compliance with the purposes set out below, collecting only the personal data necessary for the specific purposes described below. Only authorised personnel who have received appropriate training may access such data in order to guarantee the necessary confidentiality of the information provided. In particular, the Company processes your identification data.		
 Purposes of the processing	 Legal basis of the processing	 Retention period of data
1. Control of physical access via a badge to Company premises to ensure the safety and security of individuals and assets.	The legal basis for the processing of personal data is: - compliance with legal obligations to which the Controller is subject in the field of occupational health and safety, including for the purpose of ensuring the effective management of emergencies and evacuation procedures at Company premises (Article 6(1)(c) GDPR); - the pursuit of the Controller’s legitimate interest (Article 6(1)(f) GDPR) in protecting its rights and managing requests from competent Authorities.	Personal data relating to access control by badge will be stored for a period of 5 years from the date the access is recorded.
2. Fulfilment of regulatory obligations.	The lawfulness of the processing is based on the need to comply with the legal obligations to which the Controller is subject.	Personal data will be processed for the period strictly necessary to fulfil the relevant purposes, in compliance with the retention periods established by applicable law.
3. Where necessary, to establish, exercise or defend a Company’s legal claim, including judicial, arbitration or settlement proceedings.	The legal basis for the processing is the Data Controller’s legitimate interest in protecting its rights and interests and in establishing, exercising or defending legal claims.	For the duration of the relevant proceedings and thereafter for as long as necessary to enforce or comply with any resulting judgment, settlement or other legal remedy.

Once the retention period has elapsed the data will be deleted or made anonymous compatibly with technical erasure and backup procedures.	
 Way of processing and provision of data The processing will be carried out in digital form, with appropriate security and confidentiality measures by personnel specifically authorised and trained for this purpose, while also ensuring an adequate level of accuracy, resilience and cybersecurity of the systems, in line with applicable best practices and industry standards. Providing your personal data is necessary to access to the Company's premises. The processing of personal data required for badge-based access control will be carried out through specific software used by the Company. Failure to provide the required data will prevent access to the Controller's premises.	
 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 - including but not limited to providers of IT services, insurance services, reception and concierge services, and maintenance services for video surveillance systems- 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, portability, restriction and objection to processing in the cases provided for by the GDPR. These rights can be exercised at any time by submitting a written request to 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.
 Transfer of data to countries outside the European Economic Area Personal data is not transferred outside the European Economic Area ("EEA"). Should it become necessary to transfer personal data outside the EEA for the purposes described above, such transfers will be carried out in compliance with the GDPR and subject to appropriate safeguards, including an adequacy decision adopted by the European Commission, the Standard Contractual Clauses approved by the European Commission, or any other transfer mechanism permitted under applicable data protection laws.	