

PRIVACY NOTICE REGARDING THE PROCESSING OF SUPPLIERS' PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 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 the personal data of the supplier’s legal representative, directors, employees and shareholders exclusively as necessary for: - carrying out supplier qualification activities and any related due diligence; - managing the pre-contractual and contractual relationship. As part of the verification activities, data relating to suppliers’ family members may be requested and processed where necessary to perform compliance and integrity checks required by law and by the Company’s internal procedures (for example, for the management of conflicts of interest). More specifically, the personal data processed by the Controller are common personal data, including but not limited to, first name, last name, tax number, address, telephone number, e-mail address, and any other personal data available from public sources. Where necessary for integrity, anti-corruption, anti-money laundering, conflict of interest and compliance checks, the Controller may also process data relating to decisions issued by criminal judicial Authorities (including but not limited to judgments, orders and decrees), provided directly by the supplier or obtained from public sources or lawfully accessible databases, to the extent permitted by applicable law. Personal data may be collected directly from the relevant party or from third-party companies specialising in the provision of such information (information providers).		
 Purpose of the processing	 Legal basis of the processing	 Retention period of data
1. Management of supplier qualification activities (including but not limited to the assessment of the supplier’s reputation and technical, economic and financial suitability) and, where applicable, inclusion of the supplier in the list of qualified suppliers.	The legal basis for the processing of common personal data is the execution of pre-contractual measures. The processing of judicial data is authorised pursuant to legislative decree n. 231/2001 (in accordance with art. 10 GDPR).	In the absence of a contractual relationship, personal data will be retained for a period of 3 years from the completion of the supplier qualification process or, where the qualification process remains pending without further developments, from the date of the last update of the qualification documentation. Should a contractual relationship be established, the retention periods applicable to Purpose no. 3 (management of the contractual relationship) shall apply.

2. Execution of due diligence activities, preliminary to the establishment of a contractual relationship (including but not limited to, conducting preliminary assessments, and creating, updating or monitoring supplier records).	The legal basis for the processing of common personal data is the execution of pre-contractual measures. The processing of judicial data is authorised pursuant to legislative decree n. 231/2001 (in accordance with art. 10 GDPR).	For suppliers not selected following a tender process, personal data will be retained for 10 years from the completion of the supplier selection process. Should a contractual relationship be established, the retention periods applicable to Purpose no. 3 (management of the contractual relationship) shall apply.
3. Management of contractual relationship with suppliers.	The legal basis for the processing of personal data is the execution of a contract to which the data subject is a party.	Personal data will be retained for 10 years following the termination of the contractual relationship with the supplier or the completion of the project to which the relevant contracts relate, unless longer retention periods are required by applicable law or contractual provisions, or are necessary for the establishment, exercise or defence of legal claims by the Controller.
4. Fulfilment of legal obligations (e.g. anti-money laundering requirements, occupational health and safety obligations, and cybersecurity obligations under the NIS2 framework).	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.
5. Sending invitations to corporate events open to external stakeholders of the Company.	The legal basis for the processing is the Controller's legitimate interest in promoting its events, as well as in developing and strengthening relationships with third parties and the Company's stakeholders.	The identification and contact data (name, surname and business email address) used for sending such communications will be retained for the retention periods applicable to the purposes for which the data were originally collected, as set out in the relevant privacy notices.
6. 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 above retention periods have expired, personal 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.		

The processing of the personal data is necessary for the execution of the contract and for compliance with legal obligations; therefore, failure to provide such data will make it impossible to establish the contractual relationship.



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 IT service providers, hosting providers, system support and maintenance providers, companies providing administrative, accounting and document archiving services, consultants, and, more generally, entities providing support to the Controller – in their capacity as data processors under art. 28 GDPR, as well as to third parties acting as autonomous data controller, including but not limited to competent Authorities and clients.

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, rectification, deletion, portability, restriction and objection to processing, as provided for by the GDPR.

These rights can be exercised at any time, against the Controller, by sending a specific request in writing to the 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

The personal data processed is not transferred outside the European Economic Area.

Should it become necessary, for purposes related to the above-mentioned purposes, to transfer personal data to countries located outside the EEA, such transfers will be carried out in compliance with the GDPR and, in particular, on the basis of an adequacy decision adopted by the European Commission or through the implementation of the Standard Contractual Clauses approved by the European Commission, or other appropriate safeguards provided for under applicable law.

In particular, certain personal data may be transferred to Saipem Group companies located outside the EEA, such as Group companies established in India, for management, administrative and organisational support purposes, on the basis of the Standard Contractual Clauses adopted by the European Commission and the implementation of appropriate safeguards to protect personal data.