

PRIVACY NOTICE ON THE PROCESSING OF CLIENTS' AND PARTNERS' PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (UE) 2016/679 ("GDPR")

 Data Controller Saipem S.p.A., acts as the data controller for the processing of your personal data Via Luigi Russolo, 5 20138 Milan – Italy; E-mail address: privacy@saipem.com ("Company" or "Controller")	 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. In particular, the Company processes the personal data of the Client’s and Partners’ employees and advisors with whom the Company intends to enter into the agreement. Specifically, the personal data processed by the Controller will be the common data (e.g. name, surname, telephone number or e-mail). Personal data may also be collected from public open sources.		
 Purposes of the processing	 Legal basis of the processing	 Data Retention period
1. Performance of activities preliminary to the establishment of the contractual relationship.	The lawfulness of processing for common data is the execution of pre-contractual measures.	In the absence of a contractual relationship, personal data will be retained for a period of 3 years from the date the project is suspended or cancelled or awarded to another bidder. Where a contractual relationship is established, the retention period applicable to Purpose no. 2 (management of the contractual relationship) shall apply.
2. Management of the contractual relationship.	The lawfulness of processing for common data is the execution of contractual measures to which the data subject is a party.	Personal data will be retained for 10 years from the termination of the contractual relationship, or from the completion of the project to which the relevant contracts relate, without prejudice to any longer retention periods required under applicable law, provided for under the relevant contract, or necessary for the establishment, exercise or defence of legal claims.

3. Fulfilment of legal 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.
4. 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.
5. 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. The processing of personal data is necessary for the performance of the contract and for compliance with applicable legal obligations. Accordingly, failure to provide the required data will prevent the establishment of 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 management services, consultants, and, more generally, service providers supporting the Controller in carrying out its activities – in their capacity as data processors <i>under art. 28 GDPR</i> , 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 ("EEA")**

Personal data is not transferred outside the 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.