

PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF ANONYMOUS SURVEYS IN ACCORDANCE WITH ART. 13 OF REGULATION (UE) 2016/679 ("GDPR")

<div></div> <div>Data Controller</div>	<div></div> <div>Data Protection Officer (DPO)</div>	
<div>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”).</div>	<div>The DPO can be contacted at: dpo@saipem.com.</div>	
<div><div></div><div>Personal Data Processed</div></div> <div><p>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.</p><p>Only personal data strictly necessary to deliver the survey is processed: employees’ name, surname and company e-mail address. This data is used solely to distribute the survey invitation and is never linked to the responses. In addition, log data, including the IP address associated with access to the survey, may be processed in accordance with the Company’s cybersecurity policies. Such data is likewise not in any way linked, or capable of being linked, to the responses provided.</p><p>The answers to the survey are fully anonymous. No information that can directly or indirectly identify participants is collected. The survey is designed to:</p><ul style="list-style-type: none">- avoid collecting any personal data that may lead to the identification of an individual;- prevent the correlation of responses with existing company datasets;- exclude questions that, when cross-referenced, could potentially reveal the identity of participants.<p>The results of the survey will be reported in an aggregated format. In order to guarantee the participants’ confidentiality and anonymity, where a question may allow specific groups of individuals to be identified, the related results will only be shared if at least ten (10) individuals have responded to that question.</p><p>Survey answers and results will be anonymous, and it will not be possible for the Company to link the answers provided to the e-mail address or IP address of each participant.</p></div>		
<div><div></div><div>Purposes of the processing</div></div>	<div><div></div><div>Legal basis of the processing</div></div>	<div><div></div><div>Retention period of data</div></div>
<div>The purpose of the processing is expressly specified in the communication through which the survey link was provided.</div>	<div><div>The legal basis for processing is the Controller’s legitimate interest in collecting feedback in connection with the initiative described in the communication through which the survey link was provided or, as applicable, compliance with a legal obligation to which the Controller is subject.</div><div>The legal basis applicable to each survey depends on the initiative described in the</div></div>	<div>The identification data (name and company e-mail address) used to distribute the survey will be retained for the retention periods applicable to the purposes for which such data were originally collected, as specified in the relevant privacy notices.</div>

	communication through which the relevant survey link was provided.	Log data associated with access to the survey will be retained for a period of 24 months, in accordance with the requirements of applicable cybersecurity legislation. Survey answers, being fully anonymous, do not constitute personal data and are therefore not subject to data retention rules under the Regulation EU 2016/679.
Once the retention period has elapsed the data will be deleted.		
<div></div> <h3>Methods of Processing and Source of the Data</h3> <p>Data is processed in digital form with appropriate security and confidentiality measures by personnel specifically authorised and trained for this purpose. The personal data was previously collected in the context of an existing relationship with the Controller, as described in the relevant notices available at: https://www.saipem.com/en/privacy.</p>		
<div></div> <h3>Recipients and Data transfer</h3> <p>Within the purposes listed above, personal data may be disclosed to third parties performing outsourced activities on behalf of the Controller – such as the management of the survey – in their capacity as data processors under art. 28 GDPR, as well as to third parties acting as autonomous data controller.</p> <p>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.</p> <p>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.</p>	<div></div> <h3>Data subjects' rights</h3> <p>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.</p> <p>The right to data portability cannot be exercised as the processing is carried out on the basis of the Data Controller's legitimate interest.</p> <p>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.</p> <p>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.</p>	
<div></div> <h3>Transfer of data to countries outside the European Economic Area</h3> <p>Personal data described in the notice is not transferred outside the European Economic Area.</p>		