

INFORMATION ON THE PROCESSING OF PERSONAL DATA

With this document, drawn up under Article 13 of EU Regulation no. 679/2016 (hereinafter also "Regulation") **Fincantieri S.p.A.** informs you, as the data subject for the processing of personal data, of the following.

1. Data controller for personal data processing

The data controller for the processing of your personal data is **Fincantieri S.p.A.**, VAT no. 00629440322, with registered office in Trieste, Via Genova 1, (hereinafter also referred to as the "**Controller**" or the "**Company**"), email privacy@fincantieri.it, tel. +39 040 3193111 fax +39 040 3192305.

The Personal Data Protection Officer (DPO) of Fincantieri S.p.A. may be contacted at the following email address: privacy@fincantieri.it.

2. Purpose and legal basis of the processing of personal data

The personal data you provide on the basis of your relationship with Fincantieri S.p.A. (directly or through other parties, for example, in case of: subcontract, temporary association of companies, network contract, consortium, etc.) will be processed by Fincantieri S.p.A., with the support of electronic and/or paper means, only for the following purposes and on the following legal basis:

a) purpose related to the management and execution of the contractual relationship: for the performance, by way of example, of the following processing operations (i) using of your data for the management of pre-contractual activities, (ii) using of your data for sending service communications; (iii) using of your data for the delivery of health and safety information within the construction site/plant; (iv) using of your data for the verification and storage of certificates relating to your training; (v) using of your data for the control and conservation of your access data to establishments or offices of the Data Controller; (vi) using of your data for due diligence purposes; (vii) using of your data for the management of operational activities and corporate processes; (viii) use of your data to verify compliance with safety regulations. The processing is necessary in order to carry out the contractual obligations of the Controller;

b) quality audit: the processing is necessary for the Controller to carry out quality audit. The processing, where not attributable to the performance of contractual and/or legal obligations of the Controller, will take place on the basis of the legitimate interest of the Controller aimed at monitoring the proper performance of contractual activities and supporting the Controller in verifying and maintaining quality and safety standards in the performance of operational activities;

c) purpose of storing your data (if applicable) in the register of welders: processing is necessary to carry out the legal obligations of the Controller. This processing will be carried out only where the activity performed by you requires it;

d) purpose of managing documentation related to "Protocollo Quadro Nazionale di Legalità": the processing is necessary for the performance of tasks of public interest linked to cooperation with the Ministry of the Interior at a national level for the prevention and reduction of the risks of intimidation and interference by organised or common crime or in any case associated with or arising

from organised crime issues.

e) purpose related to contributory and/or social solidarity: the processing is necessary to enable verifications related to contributory and/or social security solidarity. The processing, where not attributable to the performance of contractual and/or legal obligations of the Controller based on the relationship with you, will be carried out on the basis of the legitimate interest of the Controller aimed at supporting verifications by public entities and/or qualified third parties (*e.g.*, bankruptcy trustee) regarding possible joint and several liabilities of the Controller;

f) purpose of managing conflicts of interest: the processing is necessary for the analysis of whether there is a conflict of interest between Fincantieri S.p.A.'s employees and the contractor or its employees. The processing is necessary to carry out the contractual and/or legal obligations of the Controller;

g) audit and/or legislative and regulatory compliance purpose: the processing is necessary for the execution of legal obligations of the Controller and to enable compliance with - mandatory or voluntary – corporate procedures adopted by the Company. The processing, where not attributable to the execution of contractual and/or legal obligations of the Data Controller, will take place on the basis of the legitimate interest of the Data Controller aimed at carrying out the checks on the processes and activities carried out by the Company;

h) litigation management purpose: the processing is necessary for the handling of complaints and/or disputes, for the prevention and suppression of unlawful acts, as well as, in general, for the protection of the rights and legitimate interests of the Controller and/or third parties, including in court. The legal basis for the processing is legitimate interest (the Controller's interest corresponds to the right of action and defense enshrined in Article 24 of the Italian Constitution);

i) purposes of management of development/training activities: the processing is necessary to carry out, by way of example, the following processing operations: (i) using of your data in the context of training courses, also remotely; (ii) using of your data to identify a training course; (iii) using of your data for skills assessment. The processing is performed on the basis of the legitimate interest of the Data Controller aimed at supporting the development of your skills;

j) investigative purpose and protection of corporate assets (including information assets): the processing is necessary to protect the Company against possible defaults and/or violations of law. The processing is performed on the basis of the legitimate interest of the Controller based on the constitutionally guaranteed right to property (Article 42 Italian Constitution).

It should also be noted that the personal data you provide on behalf of the potential supplier will be communicated and processed within Fincantieri S.p.A. by personnel duly appointed and instructed by the Controller.

3. Video-supervised areas

We inform you that there are video surveillance systems for the purposes referred to in paragraph 2 above, for example in reception areas, perimeter areas and access areas to the premises owned by Fincantieri S.p.A. You will also find a simplified information model, prepared in compliance with the general requirements of the Data Protection Authority (sign with camera image) located near the

range of action of the various cameras.

4. Recipients of personal data

Your personal data may be communicated, strictly in relation to and in line with the purposes set out above, to the following categories of subjects:

- Companies of the Fincantieri Group;
- directors, auditors and auditing companies;
- chambers of commerce/business register
- public bodies (*e.g.* INPS, INAIL, Provincial Labor Directorate, Tax Offices, Ministries) and Italian and/or foreign supervisory authorities;
- non-profit associations/bodies;
- funds, including private ones, for welfare and assistance;
- banking and insurance institutions;
- business organizations to which the Controller belongs;
- international organizations and authorities of foreign countries;
- banking and insurance institutions;
- partners of the Company;
- travel agencies, hotels, and others involved in travel management;
- suppliers and customers;
- inspection and certification organizations;
- any other persons for whom current legal and/or contractual regulations require disclosure in compliance with the requirements of the rule for employers and/or in cases where disclosure must be made by virtue of a contractual relationship with the Controller.

The contact data of the external processors who carry out activities in the Controller's interest may be requested by you at the following email address: privacy@fincantieri.it.

5. Transfer of personal data to a third country or an international organisation

The Data Controller may transfer your personal data outside the European Economic Area ("EEA"). In order to protect your data in the context of international transfers, the Controller will adopt appropriate safeguards, *i.e.* adequacy decisions of the European Commission pursuant to Article 45 of the Regulation, standard contractual clauses approved by the European Commission and contractual instruments providing adequate safeguards (Article 46 of the Regulation). Alternatively, transfers will take place subject to the exceptions provided for in Article 49 of the Regulation (*i. e.* consent of the data subject, necessity of the transfer for the purposes of contractual/pre-contractual measures, overriding public interest, right of defence before the courts, vital interests of the data subject or of other persons, data entered in a public register).

6. Retention period of personal data

Your data will be kept for the time necessary for the fulfilment of the contractual obligations as well as for the further purposes and legal basis described above for a maximum period of 10 (ten) years from the end of the contractual relationship between you and the Controller (*i.e.* termination of the existing order with your employer and in which you were involved), unless there are certain needs

that justify keeping the data for a longer period, such as the occurrence of litigation. In the latter case, the data will be kept until the time limit for appeals has been exhausted.

7. Rights of the data subject

We inform you that, as the data subject for the processing, you have the right to obtain from the Data Controller:

Right of access: (Article 15 of the Regulation)	confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, the right to obtain, among other things, access to your personal data and information regarding the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom the personal data have been or will be disclosed.
Right to rectification: (Article 16 of the Regulation)	(i) rectification without undue delay of inaccurate personal data concerning you and (ii) completion of your personal data, where incomplete.
Right to erasure ("right to be forgotten"): (Article 17 of the Regulation)	erasure of personal data concerning you without undue delay.
Right to restriction of processing: (Article 18 of the Regulation)	restriction of processing in the cases set out in Article 18 of the Regulation.
Right to data portability: (Article 20 of the Regulation)	receipt in a structured, commonly used and machine-readable format of personal data concerning you; the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided in the cases set out in Article 20 of the Regulation.
Right to object for processing carried out under Article 6(1)(e) or (f): (Article 21 of the Regulation)	objection, at any time, on grounds relating to your particular situation, to the processing of personal data relating to you under Article 6(1)(e) or (f), including profiling on the basis of such provisions.

At any time you will have the possibility to exercise the aforementioned rights by means of a request sent to the following e-mail address: privacy@fincantieri.it.

You also have the right to **lodge a complaint with the Data Protection Authority** if you believe that the processing concerning you violates the provisions of EU Regulation no. 679/2016.

8. Nature of data provision and consequences if data are not provided

For the processing of personal data related to the purposes referred to in paragraph 2 above, failure to provide such data will result in the impossibility of implementing pre-contractual activities and/or the contractual relationship with you.

