

The Snamprogetti Limited Retirement Benefits Scheme - Privacy Notice

What is this document?

This is the Privacy Notice for the Snamprogetti Limited Retirement Benefits Scheme. It sets out why and how the scheme's trustees and other people involved with the scheme collect, store and use information about you and your rights relating to the information.

We need personal information about you and your dependants to pay benefits under and run the scheme. We are committed to being open and honest about the information we collect and how we use it and to respecting the rights of all individuals whose information we obtain in the course of running the scheme.

We comply with all data protection laws relating to information we hold about you. We take the security of your information seriously and have robust processes in place to ensure it is kept safe and used only for proper purposes.

Who runs the scheme and is responsible for collecting and using your information?

The scheme is run by a board of trustees nominated by the scheme's employer, Saipem Limited and scheme members. We act as the scheme's data controller and decide what personal information needs to be collected and how it will be used.

In this notice when we refer to "information about you" and "your personal data", this covers any information that can identify you. For example, your name and address.

Why do we need your information?

We collect information relating to scheme members and people entitled to or eligible to be considered for benefits following the death of a member so that we can comply with our legal obligations relating to running the scheme and calculating and paying benefits.

If you are a scheme member, we need certain information about you to calculate and pay and get in touch with you about your scheme benefits. This includes things such as your address, date of birth and salary details. We may also ask you for details of family members and other people who will or could be entitled to benefits when you die.

If you are someone who is entitled to benefits following the death of a member, we will need information about you to contact you about and calculate and pay benefits.

How do we collect your information?

We collect information about you in several ways.

Information you give us

You may give us information yourself in forms we ask you to complete or when you communicate with us or our representatives. This could be by post, email, over the telephone, or at face-to-face meetings. Other people, such as the organisations which deal with the day to day running of the scheme, or Saipem Limited may collect information from you on our behalf.

Information about you received from other people

We may also receive information about you from other people.

Saipem Limited will provide us with information about you so that we can calculate and pay and get in touch with you about your scheme benefits. This will include things such as your salary details and scheme leaving and joining dates. We may also receive information about you from other pension schemes and your financial, legal or medical advisers. This information may include your contact details, date of birth, sex, employment details, financial information, or, if you are eligible for health-related benefits, medical records.

If you are someone who is entitled to benefits, or to whom we have a discretion to pay benefits following the death of a member, we may receive information about you from the member in things such as a death benefit nomination form. We may also receive information about you from other people such as the executors of the member's estate and family members of whom we make enquiries in order to determine who should be considered for the payment of death benefits.

We may also collect information such as address details from organisations such as tracing agencies. We do this to ensure our records about you are up to date and so we have correct address details to get in touch with you about your benefits.

We will check that the people from whom we obtain your personal data either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

What information do we collect?

We only collect and keep the information we need to run the scheme and calculate and pay benefits.

If you are a member of the scheme we will hold information including:

- Your name, postal and email address, telephone number, marital status, date of birth, sex and national insurance number
- Employment, salary and pension contribution details
- The name and date of birth of your spouse/civil partner or other dependants, including children
- Details of anyone you want us to consider for the payment of a lump sum benefit payable on your death – this information is optional, but it may affect our ability to pay benefits if you do not provide this information
- Details of your investment funds relating to additional voluntary contributions
- Information relating to the tax treatment of your benefits.

If you are entitled to death benefits under the scheme we may hold information such as:

- Your name, address, date of birth, sex and national insurance number
- Information showing your relationship with and financial dependency or interdependency on the member.

When your benefits become payable we will also need more information, such as your bank account details.

We may also ask you to provide certain documents so we can confirm the information we have and comply with our legal obligations. These may include birth certificates, marriage or civil partnership registration certificate, passport, driving licence, utility bills and salary slips.

If you contact the scheme's administrators by telephone, your call may be recorded. This is so that there is an accurate record of the information you have provided and the information given to you. This record can be important in dealing with any query or complaint you may have about the accuracy of this information.

We will also keep copies of communications, such as letters and emails which we send to you or you send to us which relate to your benefits under the scheme or are otherwise relevant to the running of the scheme. We will keep these so long as they are relevant to your benefit entitlements and rights under the scheme or the running of the scheme.

From time to time we may ask for your feedback and for you to check and update the information we hold about you.

Sensitive personal data

If you are entitled to benefits under the scheme, some of your information may include certain special categories of sensitive information. The types of information classed as being sensitive include information relating to things such as your health.

We do not generally collect, store or use sensitive information about you. We generally only do this where you apply for health-related benefits. In this case, we will need to process information about your health status such as doctor's letters or reports about your health and you may agree to us contacting your doctor directly. We will always ask for your agreement to us using your health data to assess your entitlement to benefits. You are entitled to withdraw this agreement at any time, although this could mean we are unable to pay benefits to you.

Our records may contain information about your marital status, but we do not process this information specifically to derive and/or record information about your sexual orientation.

How do we use your personal data?

If you are a member, or entitled to be considered for benefits on the death of a member, we use the information about you to comply with our legal obligations to calculate and pay benefits under the scheme.

We will let you know if any information we ask for is optional, and the consequences of not providing optional information. For example, you do not have to provide information on who you would like to be considered for death benefits, but this could mean that those people miss out on benefits. We will ask for your agreement to process any optional information and tell you why we are asking you for it.

In some cases, we will also process information about you where the processing is in our legitimate interests or those of a third party in ensuring that the scheme is administered effectively and that you are kept up to date about the scheme. This could include using your information for assessing member profiles and behaviours to help with investment, funding and retirement planning matters.

We will also use your information to comply with certain legal obligations such as those relating to preventing money laundering and fraud, crime prevention and payment of taxes.

If you have questions or need further information about how we use your personal information or the legal basis on which we collect and use your personal information, you can contact us using the contact details in the *Getting in touch* section at the end of this notice.

Who do we share your information with?

We share your personal information with other people who help run the scheme. These include:

- The scheme's administrators – who deal with the day-to-day calculation and payment of benefits and communications with you about the scheme.
- Our professional advisers (legal advisers, scheme actuary, investment adviser, financial adviser, covenant adviser), insurance providers, auditors, scheme product providers and investment

managers. Information about the scheme's professional advisers, insurers and auditors and the scheme's administrators can be found in the scheme's annual report which you can ask us for, free of charge.

- Third party service providers who will process information on our behalf such as, IT, communication, payroll and analytics providers.
- Tracing agencies who assist us with updating scheme data from time to time
- Saipem Limited – to help it understand the value of benefits payable to its employees. We will not share any sensitive information about you such as health information, or details of people you have nominated to receive death benefits.

Aon Hewitt Limited and the scheme's Actuary who help us run the scheme and to whom we may provide your information have asked us to include some information on how they use your information. A copy of is included with this notice.

We may also disclose your personal data to law enforcement bodies, regulators, government agencies and other third parties where we believe disclosure is necessary (i) as a matter of law or regulation; (ii) to exercise, establish or defend our legal rights; or (iii) to protect your vital interests or those of any other person. This may include organisations such as HM Revenue & Customs, the Pensions Regulator, the Pension Protection Fund, the Financial Conduct Authority and the Pensions Ombudsman.

We may also transfer information about you to a buyer or potential buyer of all or part of Saipem (and its agents and advisers) or other pension scheme trustees in connection with any reorganisation, restructuring, merger or sale, or other transfer of assets. If we do this, we will require that person to enter into a legally binding agreement to use your personal information only for those purposes and destroy it when it is no longer needed.

We may also disclose your data to any other person to whom you request us to make disclosure, or if you consent to such disclosure.

How long do we keep your information?

We keep information about you only for as long as we need it to fulfil the purposes for which we collected it, unless the law permits or requires that we retain it for longer.

As a general rule, if you are a scheme member we will hold your information for the duration of your membership of the scheme, or if you are a dependant, until all benefits have been paid to you. We do this so we can ensure your benefits are being calculated properly and deal with any queries about your benefits. We may also hold information until the period in which a legal claim about benefits can be made has come to an end. We may retain some information after you have left the scheme so we can confirm at a future date, that you or your dependants have no entitlement to scheme benefits and to meet our legal obligations, such as retaining information for tax and accounting purposes.

Is your information safe?

We take the security of your personal information seriously and have measures in place to protect information under our control from improper use. All information you provide to us is stored on secure servers. People who help run the scheme only access personal information on a need to know basis, as required for their role and receive data protection training. We also take steps to check that service providers who process your information on our behalf have appropriate protections for your information in place.

Is your information transferred outside the UK?

Your personal information may be transferred to and processed in countries other than the UK, or the country in which you are resident. These countries may have data protection laws that are different to the UK's laws, or the laws of your country in which you are resident, which in some cases, may offer less protection for how your personal information is used.

Specifically, Aon Hewitt Limited may use actuarial calculation specialists in India, although the information sent to them will not allow direct identification of any specific person. It may also store your information on its own or third party service providers' computer servers based outside the UK and the European Economic Area. However, it has put in place appropriate safeguards to require that your personal data will remain protected in accordance with this notice. These safeguards include binding corporate rules and standard data protection clauses. Aon Hewitt can provide further details on request.

Your data protection rights

You have certain rights regarding the information we hold about you. These are:

- You can ask to see a copy of the information we hold about you and ask us to update, correct, and delete it. Your right to delete information will be limited as all the information we hold about you is likely to be needed to calculate your benefits and comply with our legal obligations relating to running the scheme.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information (e.g. to another pensions provider).
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect processing of your personal information where there are other lawful processing grounds.

To contact us about your data protection rights see *Getting in touch* below.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Information will generally be provided to you free of charge, although we can charge a reasonable fee in certain circumstances.

Updates to this notice

We may update this notice from time to time in response to changing legal, technical or business developments. When we update our notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

Getting in touch

If you have any questions, concerns or complaints about this notice or our handling of your personal information, you can contact us by using the details below.

The Chair of Trustees

The Snamprogetti Limited Retirement Benefits Scheme

Aon Pension Service Centre

Phone: 0345 603 8120

Post: The Snamprogetti Limited Retirement Benefits Scheme, Aon, PO Box 196, Huddersfield, HD8 1EG

Complaints to data protection authorities

You have the right to complain to a data protection authority about our collection and use of your personal data.

If you are based in the UK you should contact:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel. 01625 545 745

Website: <https://ico.org.uk>

If you are not based in the UK, you can find details of your local data protection authority at http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm