

ACCIDENT PRIVACY NOTICE

Open Fiber S.p.A., with registered office at Largo Guido Donegani 2 – 20121 Milan, Italy, VAT No. 09320630966, in its capacity as Data Controller (hereinafter referred to as the “Data Controller” or “Open Fiber”), hereby informs you, pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter the “General Data Protection Regulation” or “GDPR”), that your personal data (hereinafter referred to as the “Data”) may be processed as described below and for the purposes set forth herein.

Purpose and Legal Basis of Processing

The personal data subject to processing include: personal identification data, contact details, and information relating to the geographical location of the registered office of your company/the company you represent. Your personal data will be processed (for the definition of “processing”, see Article 4(2) of the GDPR) for the following purposes:

- a) management of damage compensation claims;
- b) compliance with legal obligations, regulations, and, more generally, with any applicable laws in force from time to time.

The legal basis for the processing is identified as follows:

- Article 9(2)(b) of the GDPR, which provides that processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity, particularly in relation to the Controller’s rights in the area of social protection and security;
- Article 6(1)(f) of the GDPR, namely the Controller’s legitimate interest in processing personal data in order to respond to damage compensation claims.

Data Retention Period

Your personal data will be retained in accordance with the following criteria:

- for a period not exceeding ten years;
- for a period no longer than necessary to comply with applicable legal obligations.

Data Processing Methods

The processing of personal data is carried out using both paper-based and electronic tools, with appropriate measures in place to ensure data security and confidentiality, and to prevent unauthorized access, loss, or destruction, in accordance with the provisions set out

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in Chapter II (Principles) and Chapter IV (Controller and Processor) of the GDPR.

Personal data may be processed by individuals, whether internal or external, who are specifically authorized and bound by confidentiality obligations.

Scope of Data Circulation

Personal Data may be processed by third-party companies acting on behalf of the Controller in their capacity as Data Processors (such as credit institutions, professional firms, service providers/consultants involved in the management and/or maintenance of the electronic and/or IT systems used by the Controller, insurance companies for the provision of insurance services), and only for the time strictly necessary to ensure the optimal performance of the requested service.

Your Personal Data will be made accessible exclusively to individuals within the Controller's organization who require access in relation to their specific duties or hierarchical position. Such individuals will be appropriately trained to prevent any loss, destruction, unauthorized access, or unlawful processing of the Data.

Without your explicit consent (pursuant to Article 6, letters b) and c) of the GDPR), the Controller may disclose your Data to the insurance company (acting as an independent Data Controller), supervisory bodies, judicial authorities, and any other entities to whom communication is required by law or by an express legal provision.

Nature of Data Provision

The provision of your Personal Data for the purposes outlined above is mandatory. Any refusal to provide such Data and/or the provision of inaccurate or incomplete information would prevent the execution of activities necessary to assess the legitimacy of the compensation claim.

Data Disclosure

Your Personal Data will not be disclosed to unspecified third parties.

Data Transfer Abroad

Your data will not be transferred outside the European Union (EU) or the European Economic Area (EEA). However, should it become necessary, the Controller reserves the right to relocate server locations to non-EU countries. In such cases, the Controller ensures that any data transfer outside the EU will comply with Articles 44 and subsequent provisions of the GDPR, as well as applicable legal requirements. Where necessary, agreements will be established to guarantee an adequate level of data protection.

Data Controller and Data Protection Officer

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Open Fiber S.p.A. – a single-member company subject to the direction and coordination of Open Fiber Holdings S.p.A. – Registered Office: Largo Guido Donegani 2 – 20121 Milan – Milan Companies Register, Tax Code and VAT Number 09320630966 – R.E.A. MI 2083127 – Share Capital Euro 250,000,000 fully paid-up.



The Data Controller is Open Fiber S.p.A., a single-member company subject to the direction and coordination of Open Fiber Holdings S.p.A., with registered office at Largo Guido Donegani 2 – 20121 Milan, Italy, VAT number, tax identification number and registration number in the Milan Companies Register 09320630966, contactable via the following e-mail address: privacy@openfiber.it.

Exercise of Rights

We inform you that, as the Data Subject ("Data Subject") regarding the processing of your personal data, you have the right to exercise the rights provided for under the GDPR, specifically: a) the right, pursuant to Article 15, to obtain confirmation as to whether or not personal data concerning you are being processed and, if so, to access such data and the following information: i) the purposes of the processing; ii) the categories of personal data concerned; iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if recipients are third countries or international organizations; iv) where possible, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period; v) the existence of the right of the Data Subject to request from the Data Controller rectification or erasure of personal data or restriction of processing or to object to such processing; vi) the right to lodge a complaint with a supervisory authority pursuant to Articles 77 et seq. of the GDPR; vii) where the personal data are not collected from the Data Subject, any available information as to their source; viii) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR, and, at least in those cases, meaningful information about the logic involved as well as the significance and the envisaged consequences of such processing for the Data Subject; ix) the right to be informed about the existence of appropriate safeguards pursuant to Article 46 of the GDPR relating to the transfer, where applicable, of personal data to a third country or an international organization. b) The Data Subject shall also have, where applicable, the possibility to exercise the rights set forth in Articles 16-21 of the GDPR (right to rectification, right to erasure, right to restriction of processing, right to data portability, and right to object). We inform you that Open Fiber undertakes to respond to your requests no later than one month from receipt of the request. This time limit may be extended depending on the complexity or number of requests, and Open Fiber will inform you of the reasons for such extension within one month from your request. The outcome of your request may be provided in writing, either on paper or electronically.

Methods for Exercising Rights

The Data Subject may exercise the aforementioned rights at any time and request the updated list of Data Processors by submitting a request to the following e-mail addresses: privacy@openfiber.it or dpo.of@openfiber.it.

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Should you believe that the processing of your personal data violates the provisions of the Regulation, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), as provided for under Article 77 of the GDPR, or to seek judicial remedies pursuant to Article 79 of the GDPR, following the procedures and guidelines published on the Authority's official website: www.garanteprivacy.it.

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