



PRIVACY NOTICE

WEBSITE USERS

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 data provided during navigation on the website openfiber.it are processed by the Data Controller in compliance with applicable regulations.

The legal basis for the processing lies in the provision of services by the Data Controller, the management and facilitation of the website, the management of reserved areas within the website, and, where applicable, your consent to the processing of your Data.

The processing of your Data by the Data Controller is aimed at pursuing the following purposes:

- a) **SUBMISSION OF REQUEST TO BECOME AN OPEN FIBER PARTNER:** if you decide to register in the “Become a Partner” section, only following your specific and explicit consent, your Data will be processed by the Data Controller for your registration and consequent access to dedicated services;
- b) **REQUEST FOR TERMINATION/FEEDER SEGMENT BY OPERATORS:** if you decide to request information related to the fiber optic termination segment/feeder line, only following your specific and explicit consent, your Data will be processed by the Data Controller to respond to your requests and provide the requested information;
- c) **ACCESS TO THE SUPPLIERS AREA:** if you decide to access the suppliers area, only following your specific and explicit consent, your Data will be processed by the Data Controller to:
 - i. allow access to the reserved area of the openfiber.it website in the “Suppliers Area” section;
 - ii. manage the registration process for the Open Fiber suppliers list;
 - iii. identify and select suppliers (companies and professionals) interested in working with Open Fiber; assess the suitability of the economic operator for collaboration with Open Fiber;
- d) **ACCESS TO THE CAREERS SECTION:** if you decide to register and create an account in the “Careers” section of the openfiber.it website, only following your explicit

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consent, the Data you provide may be processed by the Data Controller to obtain relevant information about your Curriculum Vitae and proceed with the evaluation of your application;

- e) CONTACT US: if you decide to contact us via the “Contact Us” section of the openfiber.it website, only following your specific and explicit consent, the Data you provide may be processed by the Data Controller to respond to your request and provide the information you have asked for;
- f) SOCIAL NETWORKS: the openfiber.it website allows access to Open Fiber’s social media pages. In this context, as further detailed in the “Cookie Policy” available on the website, third-party Cookies may be installed on the Open Fiber website.

Data Retention Period

With regard to the different purposes for which the Data are collected, the Data will be retained for the time strictly necessary to achieve such purposes and, in any case, in compliance with applicable legal provisions.

In any event, the Company will ensure to avoid the indefinite use of the data by periodically verifying the continued interest of the data subject to whom the Data refer.

Data Processing Methods

The processing of Data is carried out by the Data Controller in compliance with the applicable laws and regulations. The Data Controller processes the Data using IT and/or telematic tools and organizational and logical methods strictly related to the purposes outlined in this privacy notice, also adopting appropriate security measures to prevent unauthorized access, disclosure, alteration, or destruction of the Data, as well as their loss and unlawful or improper use. The Data Controller also commits to processing the Data according to the principles of fairness, lawfulness, and transparency, collecting them only to the extent necessary and accurate for the processing, and allowing their use solely by authorized personnel.

The management and storage of the acquired Data will take place in archives or on servers located within the European Union or the European Economic Area owned by the Data Controller and/or third-party companies appointed as data processors and, in any case, currently situated in Italy.

The Data processing is carried out using paper-based and electronic supports with measures suitable to guarantee the security and confidentiality of the Data, aimed at preventing unauthorized access, loss, or destruction, in compliance with Chapter II (Principles) and Chapter IV (Controller and Processor) of the GDPR. The Data may be processed by authorized persons, internal or external to the Data Controller, who are committed to confidentiality.

The Data processed by the Data Controller are those provided by the user during the

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navigation of the openfiber.it website, during any registration/adhesion to the services made available by the Data Controller and/or the submission of their Curriculum Vitae in the “Careers” section.

Scope of Data Circulation

Your Data may be processed by third-party companies acting on behalf of the Data Controller in their capacity as Data Processors (such as credit institutions, professional firms, suppliers/consultants who manage and/or participate in the management and/or maintenance of the electronic and/or telematic tools used by us, insurance companies for the provision of insurance services), strictly for the time necessary to optimally perform such services. Your Data will be accessible only to those who need it in relation to the performance of their duties or hierarchical position. These individuals will be properly trained to prevent 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 Data Controller may disclose your Data to supervisory bodies, judicial authorities, and any other entities to whom disclosure is mandatory based on an express legal provision.

Nature of Data Provision

With reference to the purposes set forth in letter a) of the first paragraph, the provision of Your Data and consent to their processing is mandatory. Failure to provide such consent will prevent the Data Controller from allowing the submission of Your request to become an Open Fiber partner.

With reference to the purposes set forth in letter b) of the first paragraph, the provision of Your Data and consent to their processing is mandatory. Failure to provide such consent will prevent the Data Controller from responding to Your requests for information regarding the termination/adduction segment from operators.

With reference to the purposes set forth in letter c) of the first paragraph, the provision of Your Data and consent to their processing is mandatory. Failure to provide such consent will prevent Open Fiber from:

- allowing access to the reserved area of the openfiber.it website in the “Supplier Area” section;
- managing the registration process for the Open Fiber suppliers’ list;
- identifying and possibly selecting You among the companies (businesses and professionals) interested in collaborating with Open Fiber;
- assessing the suitability of the Economic Operator to collaborate with Open Fiber.

With reference to the purposes set forth in letter d) of the first paragraph, the provision of Your Data and consent to their processing is mandatory. Failure to provide such consent

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will prevent the Data Controller from proceeding with the evaluation of Your application.

With reference to the purposes set forth in letter e) of the first paragraph, the provision of Your Data and consent to their processing is mandatory. Failure to provide such consent will prevent the Data Controller from responding to Your requests for information.

In this context, it is specified that the processing may also be carried out for compliance with obligations provided by law, regulations, and, in general, the applicable provisions from time to time.

Data Disclosure

Your Data will not be disclosed to unspecified third parties. The Data collected will not be in any way disseminated or communicated to third parties, except in cases provided for in this privacy notice and/or by law, and in any case in the manner permitted therein. The Data will be processed within the limits and for the purposes described, by the Company's employees.

Some Data processing activities may also be carried out by third parties appointed as Data Processors, whom the Data Controller uses or may use in the management of the contractual relationship, the provision of services offered, and for the organizational needs of its business. In particular, the Data may be communicated, by way of example, to:

- public and private entities entitled to access the Data pursuant to legal provisions, regulations, or EU legislation, within the limits set by such rules;
- parties who need access to the Data for purposes related to the contractual relationship between the parties, strictly to the extent necessary to carry out auxiliary tasks (such as banks and credit institutions, technical service providers, hosting providers, IT companies, communication agencies, postal couriers and shipping companies);
- consultants, within the limits necessary to perform their professional duties.

Data Transfer Abroad

The Data will not be transferred outside the European Union and the European Economic Area. However, it is understood that the Data Controller, if necessary, may relocate the servers to non-EU countries. In such cases, the Data Controller hereby ensures that any transfer of Data outside the EU will be carried out in compliance with Articles 44 et seq. of the GDPR and applicable legal provisions, entering into agreements, if necessary, that guarantee an adequate level of 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., with registered office at Largo Guido Donegani 2 – 20121 Milan MI, Italy, VAT number 09320630966. Open Fiber has appointed a Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, who can be contacted at the following address: dpo.of@openfiber.it.

Exercise of Rights

As the Data Subject, we inform you that you have the right to exercise the rights provided under the GDPR, namely the right, pursuant to Article 15, to obtain confirmation as to whether or not personal data concerning you are being processed and, where that is the case, access to the personal 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, particularly if recipients are located in 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 to request from the controller rectification or erasure of personal data or restriction of processing concerning the data subject or to object to such processing;
- vi. the right to lodge a complaint with a supervisory authority pursuant to Articles 77 and following 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, pursuant to 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 of the existence of appropriate safeguards pursuant to Article 46 of the GDPR relating to transfers, where personal data are transferred to a third country or to an international organization.

The data subject also has the possibility (where applicable) to exercise the rights referred to in Articles 16-21 of the GDPR (right to rectification, right to erasure, right to restriction of processing, right to data portability, right to object).

We inform you that the Data Controller commits to responding to your requests no later than one month from receipt of the request. This period may be extended depending on the complexity or number of requests, and the Company will inform you of the reason for the extension within one month of receiving your request. The outcome of your request may be provided to you in writing, either in paper or electronic format.

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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

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.

Changes to this Privacy Notice

The Data Controller reserves the right to make changes to this Privacy Notice at any time by informing users on the website openfiber.it. Therefore, please consult this page regularly, referring to the date of the last update indicated at the end of the document. In case of non-acceptance of the changes made to this Privacy Notice, the Data Subject may request that the Data Controller delete their personal data. Unless otherwise specified, the previous Privacy Policy will continue to apply to the data collected up to that time.

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