



PRIVACY NOTICE FOR CANDIDATES APPLYING TO JOB POSITIONS

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

We kindly invite you, in this context, not to disclose any “special categories of personal data” as defined under Article 9 of the GDPR, except for those you deem absolutely necessary to allow Open Fiber to adequately evaluate your application.

Please be informed that any special categories of personal data voluntarily provided by you to Open Fiber, including through submission of your curriculum vitae, may be processed solely for the purposes set forth below.

The processing of any special categories of personal data concerning you shall, in any case, be subject to your explicit consent, to be given by ticking the relevant box at the end of this privacy notice.

Furthermore, we kindly ask you not to provide data relating to criminal convictions or offences concerning you as defined under Article 10 of the GDPR.

Purpose and Legal Basis of the Processing

The Data you provide to Open Fiber, such as your personal identification and contact details, residence/domicile information, educational background, details of previous work experience and related remuneration, your curriculum vitae, and any special categories of personal data, may be used for the following purposes:

- a) to carry out recruitment and/or personnel selection activities;
- b) to contact and communicate with you regarding recruitment and/or personnel selection activities.

Please also note that, if included in your curriculum vitae, the Company may process your image to better associate it with your name, solely for purposes related to recruitment and/or personnel selection activities. The legal basis for the processing is the performance of pre-contractual agreements and your consent to the processing of your Data.

Data Retention Period

The Data concerning you will be retained according to the following criteria:

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- for a period not exceeding the time necessary to achieve the purposes for which the Data are processed, and in any case no longer than 365 days;
- for a period not exceeding the time necessary to comply with legal obligations.

Data Processing Methods

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

Scope of Data Disclosure

The Data may also be processed by third-party companies that perform activities on behalf of the Data Controller, in their capacity as external 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 we use, insurance companies providing insurance services, for the strictly necessary time to optimally perform such services). Your personal Data will be accessible only to those within Open Fiber who need it in relation to their job role or hierarchical position. Such persons will be properly instructed to prevent loss, destruction, unauthorized access, or unlawful processing of the Data.

Without your explicit consent (pursuant to art. 6 letters b) and c) of the GDPR), the Data Controller may communicate your Data to supervisory bodies, judicial authorities, as well as to any other entities to whom communication is mandatory based on an express legal provision.

Nature of Data Provision

The provision of your Data for the purposes outlined above is mandatory. Any refusal on your part to provide such Data and/or the provision of inaccurate and/or incomplete information may result in Open Fiber being unable to:

- a) carry out recruitment and/or personnel selection activities;
- b) contact and communicate with you regarding recruitment and/or personnel selection activities.

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Data Disclosure

Your Data will not be disseminated to unspecified parties.

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 countries outside the EU. 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 and following of the GDPR and applicable legal provisions, by entering into agreements that guarantee an adequate level of protection, if necessary.

Data Controller and Data Protection Officer

The Data Controller is Open Fiber S.p.A., with registered office at Largo Guido Donegani 2 – 20121 Milan, MI, Italy, VAT No. 09320630966. Open Fiber has appointed the Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, who can be contacted at the following email address: dpo.of@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

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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. 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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