



PRIVACY NOTICE

CONTACT US

Open Fiber S.p.A., with registered office at Largo Guido Donegani 2 – 20121 Milan, Italy, VAT Number 09320630966, in its capacity as Data Controller of personal data (hereinafter “Controller” or “Open Fiber”), hereby informs you, pursuant to Articles 13 and 14 of EU Regulation No. 2016/679 (hereinafter also referred to as the “General Data Protection Regulation” or “GDPR”), that your personal data (hereinafter “Data” or “the Data”) may be processed as described below and for the purposes indicated herein.

Purpose and Legal Basis of the Processing

Your personal data being processed are: first name, last name, residential data (address, house number, city, and postal code), email, and phone number (optional).

Your personal data will be processed for the following purposes:

1. To provide you with a response regarding your request for information;
2. For marketing activities, market research, and commercial communication related to Open Fiber’s activities. Such activities may be carried out by sending advertising, informational, promotional material or invitations to participate in initiatives, events, and offers, either through “traditional” means (e.g., postal mail and/or operator calls) or through “automated” contact systems (e.g., SMS, social media messages such as WhatsApp, automated phone calls without operator intervention, emails, interactive applications), pursuant to Article 130 paragraphs 1 and 2 of the Italian Privacy Code (Codice in materia di protezione dei dati personali) and subsequent amendments.

The legal basis for the processing under point 1) is legitimate interest pursuant to Article 6(1)(f) of the GDPR, while for the purposes under point 2) the legal basis is consent pursuant to Article 6(1)(a) of the GDPR.

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Tempi di conservazione dei Dati

I Dati che La riguardano verranno conservati:

- relativamente alla finalità 1): fino a quando non comunicherà la Sua richiesta di cancellazione ad Open Fiber scrivendo a privacy@openfiber.it e in ogni caso fino a quando non saranno più necessari per finalità di *business*;
- relativamente alla finalità 2): sino alla revoca del Suo consenso.

In ogni caso, i Suoi dati saranno conservati per un arco di tempo non superiore a quello necessario all'adempimento di eventuali obblighi normativi.

Data Retention Period

The processing of Data is carried out using paper-based supports 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 internal or external parties specifically authorized and committed to confidentiality.

Scope of Data Disclosure

The Data may also be processed by third-party companies that carry out activities on behalf of the Data Controller, in their capacity as external data processors (such as credit institutions, professional firms, suppliers/consultants managing and/or participating in the management and/or maintenance of the electronic and/or telematic tools used by us, insurance companies providing insurance services, for the time strictly necessary for the optimal execution of such services). Your Data will be accessible only to those within Open Fiber who need it in relation to the performance of their duties or hierarchical position. Such individuals will be properly instructed to prevent loss, destruction, unauthorized access, or unlawful processing of the Data itself. 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, and all other subjects to whom communication is mandatory based on an express provision of law.

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Nature of Data Provision

The provision of Your Data for the above-mentioned purposes is mandatory (except for the phone number). Any refusal and/or provision of inaccurate and/or incomplete information would prevent Open Fiber from responding to your requests.

Data Disclosure

Your Data will be shared between the Data Controller and the duly appointed Data Processors for the execution of the activity.

Data Transfer Abroad

The Data will not be transferred outside the European Union or 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 et seq. of the GDPR and applicable legal provisions, including, where necessary, the execution of agreements that guarantee an adequate level of protection.

Data Controller and Data Protection Officer

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.

Open Fiber has appointed the Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, who can be contacted at the following e-mail address: dpo.of@openfiber.it.

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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.

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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.

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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.