



PRIVACY NOTICE FOR TELEMARKETING ACTIVITIES

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

The personal data subject to processing include: identification data, address, city, postal code, telephone number, and e-mail address. Your personal data will be processed (for the definition of “processing,” see Article 4(2) of the GDPR) for the purpose of telemarketing, specifically to offer you the opportunity to activate internet services using the Open Fiber infrastructure through telephone operators.

The legal basis for the processing is your consent, pursuant to Article 6(1)(a) of the GDPR. Your data were transmitted to Open Fiber by AdSalsa Italia Pubblicità Sucursale S.L.U., which collected them within its private database based on specific consent provided by you.

Data Retention Period

The Data concerning you will be retained as long as necessary for the purpose outlined above and, in any case, will be deleted by the Data Controller within a maximum of 6 months from the start of the activity.

Data Processing Methods

The processing of Data is carried out using electronic tools with appropriate measures 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 (Controller and Processor) of the GDPR. The Data may be processed by authorized internal or external parties who are bound to confidentiality.

Scope of Data Disclosure

Your data may also be processed by third-party companies acting on behalf of the Controller, in their capacity as external data processors (e.g., credit institutions, professional firms, suppliers/consultants managing and/or participating in the management and/or maintenance of the electronic and/or telematic tools we use,

PUBLIC



insurance companies providing insurance services). Processing will be limited to the time strictly necessary for the optimal execution of these services.

Your data will be accessible only to those within Open Fiber who require access due to their role or hierarchical position. These individuals will be appropriately trained to prevent data loss, destruction, unauthorized access, or unauthorized processing.

Without your explicit consent (pursuant to Article 6(b) and (c) of the GDPR), the Controller may disclose your data to supervisory bodies, judicial authorities, and other entities to which disclosure is mandatory under an explicit legal provision.

Nature of Data Provision

The provision of your Data for the purposes described above is optional. Any refusal to provide data and/or the provision of inaccurate or incomplete information with reference to point 1 would prevent communication between Open Fiber and the users concerned in the telemarketing activity. In any case, you may exercise your right to object to the processing by writing to privacy@openfiber.it.

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.

PUBLIC

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.



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. 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.

PUBLIC