



Apartment Building Administrators Privacy Information Notice

Open Fiber S.p.A., with registered office at Viale dell’Innovazione n. 1 – 20126 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, address, city, postal code, company name and VAT number of your company or the company you represent, VAT number of the entity or organization you represent, telephone number, and e-mail address (for the definition of “processing,” see Article 4, Paragraph 2 of the GDPR). Your personal data will be processed for the following purpose: the management of activities related to the fiber optic cabling of the building for which you act as Administrator.

The legal basis for the processing is the legitimate interest pursuant to Article 6(1)(f) of the GDPR.

Data Retention Period

Your data will be retained only for as long as it is necessary to achieve the aforementioned purposes.

Data Processing Methods

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Data processing is carried out using paper-based and electronic tools, with appropriate measures in place to ensure data security and confidentiality, 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 internal or external parties specifically authorized and bound by confidentiality obligations.

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, 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

Providing your data for the aforementioned purpose is mandatory. Any refusal and/or the provision of inaccurate and/or incomplete information would hinder communication between Open Fiber and the condominiums interested in fiber optic cabling. Nonetheless, you may exercise your right to object to the processing by writing to privacy@openfiber.it.

Data Disclosure

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Your data will not be subject to disclosure.

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

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 Viale dell'Innovazione n. 1 – 20126 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.

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

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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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Open Fiber S.p.A. – a single-member company subject to the direction and coordination of Open Fiber Holdings S.p.A. –
Registered Office: Viale dell'Innovazione 1 – 20126 Milan – Milan Companies Register, Tax Code and VAT Number 09320630966
– R.E.A. MI 2083127 – Share Capital Euro 250,000,000 fully paid-up.