



## **CONTACT INFORMATION NOTICE**

Open Fiber S.p.A., with its registered office at Viale dell'Innovazione n. 1 – 20126 Milan, Italy, VAT number 09320630966, as the Data Controller (hereinafter referred to as the "Controller" or "Open Fiber"), informs you, pursuant to Article 13 of EU Regulation No. 2016/679 (hereinafter also referred to as the "General Data Protection Regulation" or "GDPR"), that your personal data (hereinafter referred to as "Data" or "the Data") may be processed under the terms and for the purposes described below.

### **Purposes and Legal Basis for Processing**

The personal data subject to processing include: personal details, address, city, postal code, company name/VAT number of your company/the company you represent, VAT number of the entity/organization you represent, phone number, and email address.

Your data will be processed (for the definition of "processing," see Article 4, paragraph 2 of the GDPR) within the context of business relationships for the following purpose: business communication via email or telephone.

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

### **Data Retention Period**

Your data will be retained until you request its deletion using the method indicated in the communication sent by Open Fiber or by writing to [privacy@openfiber.it](mailto:privacy@openfiber.it), and in any case, as long as it is necessary for business purposes.

### **Data Processing Methods**

The processing of your Data is carried out using paper-based and electronic tools with appropriate measures to ensure the security and confidentiality of the Data, aimed at

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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 authorized internal or external parties committed to confidentiality.

### **Scope of Data Disclosure**

Your Data may also be processed by third-party companies acting on behalf of the Data Controller, in their capacity as external data processors (such as banks, 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 for the provision of 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 job duties or hierarchical position. These individuals will be properly instructed 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 communicate your Data to supervisory bodies, judicial authorities, as well as any other parties to whom communication is mandatory by law.

### **Nature of Data Provision**

The provision of Your Data for the aforementioned purposes is mandatory. Any refusal to provide such Data and/or the provision of inaccurate or incomplete information would prevent business communication between companies.

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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 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 assures that the transfer of Data outside the EU will comply with Articles 44 et seq. of the GDPR and applicable legal provisions, including, if necessary, the signing of agreements that guarantee an adequate level of protection.

### **Data Controller and Data Protection Officer**

The Data Controller is Open Fiber S.p.A., with registered office at Viale dell'Innovazione n. 1 – 20126 Milan MI, Italy, VAT number 09320630966, reachable at the following email address: [privacy@openfiber.it](mailto:privacy@openfiber.it).

Open Fiber has appointed a Data Protection Officer (DPO), pursuant to Article 37 of the GDPR, who can be contacted at the following email address: [dpo.of@openfiber.it](mailto: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

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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](mailto:privacy@openfiber.it) or [dpo.of@openfiber.it](mailto: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

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pursuant to Article 79 of the GDPR, following the procedures and guidelines published on the Authority's official website: [www.garanteprivacy.it](http://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.