



PRIVACY NOTICE SOCIAL NETWORKS USERS

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 Data collected is processed by the Controller in accordance with applicable regulations.

The legal basis for the processing is legitimate interest pursuant to Article 6(1)(f) of Regulation (EU) 2016/679. The processing of your Data by Open Fiber is aimed at pursuing the following purposes:

- responding to users’ requests;
- assessing corporate reputation.

Processed Data

The Data processed by the Controller includes all publicly available data on social media platforms (Facebook and X), which will be collected in the following cases:

- when a user comments on an Open Fiber post on Facebook/X without tagging/mentioning Open Fiber;
- when a user comments on a Facebook/X post by another account that has tagged/mentioned Open Fiber;
- when a user creates a Facebook/X post on Open Fiber’s page;
- when a user sends a private message to Open Fiber;

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- when a user shares an Open Fiber post on the X platform.

Methods of data processing and retention

The Data are processed by the Controller in accordance with the applicable legislation in force. The Controller carries out the processing using IT and/or electronic tools and through organizational methods and logics strictly related to the purposes outlined in this privacy notice. Appropriate security measures are adopted to prevent unauthorized access, disclosure, modification, or destruction of the Data, as well as loss, unlawful, or improper use.

The Company also undertakes to process the Data according to the principles of fairness, lawfulness, and transparency, collecting them only to the extent necessary and relevant to the purposes of the processing and ensuring their use is restricted to personnel specifically authorized for such purposes.

The management and storage of the acquired Data will take place in archives or on servers located within the European Union, owned by the Controller and/or by third-party companies appointed as external data processors, and currently located in Italy.

Depending on the different purposes for which the Data are collected, they will be retained for the time strictly necessary to achieve such purposes and, in any case, for no longer than 30 days, except in exceptional circumstances that may require additional processing time.

In any event, the Company will ensure that Data are not retained indefinitely, by periodically verifying whether the interest of the data subject is still valid.

Recipients and data processors

The Data collected will not be disclosed or communicated to third parties in any way, except in the cases provided for in this privacy notice and/or by law, and in any case, in the manner permitted by such regulations. The Data will be processed, within the limits and for the purposes described, by the Company's employees. Some Data processing activities

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may also be carried out by third parties, appointed as external data processors, whom the Controller engages or may engage in connection with the management of the contractual relationship, the provision of services, and for organizational needs related to its business operations.

The updated list of external data processors is available at the Controller's registered office and may be obtained by the Data Subject upon request by sending an email to: privacy@openfiber.it.

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 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, entering into agreements, if necessary, that guarantee an adequate level of protection.

Data Subject Rights

As a Data Subject, you are entitled to exercise the rights provided under the GDPR, and specifically the right, pursuant to Article 15, to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, to access such data and the following information:

- i. the purposes of the processing;
- ii. the categories of data concerned;
- iii. the recipients or categories of recipients to whom the data have been or will be disclosed, in particular recipients in third countries or international organizations;
- iv. where possible, the envisaged period for which the data will be stored, or, if not possible, the criteria used to determine that period;

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- v. the existence of the right to request from the 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 data are not collected from the data subject, any available information as to their source;
- viii. the existence of automated decision-making, including profiling as referred to in Article 22(1) and (4) of the GDPR, and, at least in such 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 of the appropriate safeguards pursuant to Article 46 of the GDPR relating to the transfer of data to a third country or to an international organization.

Where applicable, you may also exercise your rights under Articles 16–21 of the GDPR (right to rectification, right to erasure, right to restriction of processing, right to data portability, right to object to processing).

You may exercise the above-mentioned rights at any time by sending a request to the following email addresses: privacy@openfiber.it.

Open Fiber undertakes to respond to your request within one month. In cases of particular complexity, the response time may be extended to a maximum of three months. In any case, the Controller will inform you of the reason for the delay within one month of the request.

The outcome of the request will be provided in writing or in electronic format. In the event of a request for rectification, erasure, or restriction of processing, the Controller shall communicate any such rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

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

Changes to this Privacy Notice

The Data Controller reserves the right to make changes to this Privacy Notice at any time by informing users on the website openfiber.it. Therefore, please consult this page regularly, referring to the date of the last update indicated at the end of the document. In case of non-acceptance of the changes made to this Privacy Notice, the Data Subject may request that the Data Controller delete their personal data. Unless otherwise specified, the previous Privacy Policy will continue to apply to the data collected up to that time.

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