

WHISTLEBLOWING NOTICE

Open Fiber S.p.A., with registered office in Viale dell’Innovazione 1 – 20126 Milan, Italy, VAT No. 09320630966, as Data Controller (“Open Fiber” or the “Controller”), informs you, pursuant to Article 13 of EU Regulation 679/2016 (“GDPR”), that your personal data (“Data”) provided through the above form may be processed for the purposes and according to the methods set out below.

PURPOSE AND LEGAL BASIS OF PROCESSING

Personal data, including (i) identification data, (ii) contact details, and (iii) information relating to the submitted report, will be processed for:

- Management of the report: receiving, recording, and analyzing reports of unlawful conduct or non-compliant behaviour;
- Internal assessments and investigations: conducting preliminary and, if necessary, in-depth investigations to verify the validity of the report and adopt corrective actions;
- Legal and regulatory compliance: communicating data to competent authorities when required by law;
- Protection of the whistleblower: ensuring confidentiality and safeguarding of the whistleblower as required by applicable whistleblowing laws.

Legal bases:

- Art. 6(1)(c) GDPR (legal obligations);
- Art. 6(1)(f) GDPR (legitimate interest in preventing and managing unlawful/non-compliant conduct);
- Art. 9(2)(g) GDPR (processing of special categories or judicial data if necessary).

DATA RETENTION PERIOD

Data will be retained:

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- Until completion of the report management process and for no longer than 5 years from notification of the final outcome;
- For legal obligations, only for the strictly necessary duration;
- Data relating to unfounded or irrelevant reports will be deleted within 6 months after closure of the review.

DATA PROCESSING METHODS

Processing is carried out using paper and electronic systems with security measures to protect confidentiality and prevent unauthorized access, loss, or destruction, in line with GDPR principles. Data may be processed by internal or external authorized personnel bound by confidentiality.

DATA SHARING

Data may be processed by third parties acting as external processors (e.g., credit institutions, professional firms, IT service providers, insurance companies). Only personnel within Open Fiber requiring access for their role will be authorized. Without your explicit consent, the Controller may disclose Data to supervisory bodies or judicial authorities when required by law.

NATURE OF DATA PROVISION

Providing Data is mandatory for the purposes described. Failure or provision of inaccurate/incomplete information prevents proper management of the report.

DATA DISCLOSURE

Your Data will not be disseminated.

DATA TRANSFER OUTSIDE THE EU

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Data will not be transferred outside the EU/EEA. If necessary, the Controller may relocate servers outside the EU, ensuring compliance with GDPR (Articles 44 et seq.) and adopting adequate safeguards.

DATA CONTROLLER AND DATA PROTECTION OFFICER

The Controller is Open Fiber S.p.A., Viale dell'Innovazione 1 – 20126 Milan, Italy. Email: privacy@openfiber.it.

The Data Protection Officer (DPO) can be contacted at dpo.of@openfiber.it.

DATA SUBJECT RIGHTS

You may exercise the rights set out in Articles 15–21 GDPR (access, rectification, erasure, restriction, portability, objection). The Controller will reply within one month, with possible extensions based on complexity. You may lodge a complaint with the Data Protection Authority.

EXERCISING RIGHTS

Requests may be sent to: privacy@openfiber.it or dpo.of@openfiber.it.

If you believe your rights have been violated, you may submit a complaint to the Italian Data Protection Authority: www.garanteprivacy.it.

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