



Information Notice for Job Applicants

Open Fiber S.p.A., with its registered office at Viale dell’Innovazione n. 1 – 20126 Milan, MI, Italy, VAT No. 09320630966, in its capacity as the Data Controller of its employees’ personal data (hereinafter referred to as the “Data Controller”), hereby informs you, pursuant to Article 13 of EU Regulation No. 679/2016 (hereinafter the “General Data Protection Regulation” or “GDPR”), that your personal data (hereinafter referred to as “Data”) related to, connected with, and/or necessary for your employment relationship may be processed in the manner and for the purposes outlined below.

Purpose and Legal Basis for Processing

Your Data will be processed (as defined in Article 4, paragraph 2 of the GDPR) for the following purposes:

1. a) The establishment, management, and termination of the employment relationship with our Company;
2. b) The processing and payment of remuneration, as well as the handling of all related administrative and accounting tasks;
3. c) Compliance with legal, regulatory, and legislative obligations applicable to the employment relationship, including obligations towards tax authorities and social security and welfare agencies;
4. d) The provision of training courses (both mandatory training required by law and any non-compulsory training courses);
5. e) Ensuring health and safety;
6. f) Monitoring employees’ expenses (e.g., travel, telephone services, vehicles);
7. g) The use of work tools;
8. h) Access control.

The legal basis for the processing is identified, for example, in the establishment, execution, and potential termination of the employment contract between you and the Company, as well as in the obligations directly and/or indirectly arising from or related to that contract.

PUBLIC

Personal Data Subject to Processing

In particular, the Data in question includes:

– Your name, address, or other personal identifiers, as well as information concerning your family members, social security details, educational and employment history, and possibly your bank account details (common Data), along with videos and photographs.

The Data Controller may also process “special categories of personal data” as defined in Article 9 of the GDPR and Data relating to “criminal convictions and offences” as defined in Article 10 of the GDPR for the purposes outlined above. Regarding personal data, photos, and videos processed for video surveillance purposes, all Data Subjects can consult the extended privacy notice available on the notice boards at the reception of the company offices and via the following link: <https://openfiber.it/privacy-policy/>

Special Categories of Personal Data and Data Relating to Criminal Convictions or Offences

Other Data referred to in Article 9 of the GDPR may be processed, specifically Data that can reveal:

- Health status (e.g. documentation of disability for the purposes of
- mandatory employment; sickness, maternity, or accident certificates for documenting work absences; Data regarding inability to work for assignment to specific tasks or to apply particular work-related prescriptions; Data on inability to work for family allowance purposes);
- Membership in a trade union, association, or union-like organisation (for example, when requesting salary deductions for the payment of membership fees); – Racial and ethnic origin;
- Religious beliefs (e.g. in cases of leave and/or religious holidays other than Catholic holidays, in accordance with applicable legislation), as well as philosophical or other beliefs.

PUBLIC



Data revealing any criminal convictions and ongoing criminal proceedings may also be processed in accordance with Presidential Decree (D.P.R.) 14 November 2002, No. 313, as amended and supplemented. (“Testo unico delle disposizioni legislative e regolamentari in materia di casellario giudiziale, di anagrafe delle sanzioni amministrative dipendenti da reato e dei relativi carichi pendenti (Testo A)’); such Data will be processed in compliance with the principles set out in Article 10 of the GDPR.

The aforementioned Data will be processed by personnel who require it for the performance of their duties or based on their hierarchical position within the relevant organisational unit, and in any case, solely for the purposes outlined in paragraph 1 of this information notice.

Data Retention Periods

The Data provided will be retained for the entire duration of your employment relationship with our Company and, subsequently, for the period required by applicable laws and regulations. Certain types of Data related to the employment relationship may be retained for as long as necessary to protect Open Fiber’s legal defence needs in court, to respond to requests for information from social security agencies, or to meet requests from authorities and/or judicial police for investigative purposes.

How Data Are Used

The processing of Data is carried out using both paper and electronic means, with appropriate measures in place to ensure the security and confidentiality of the Data, in compliance with the provisions of Chapter II (Principles) and Chapter IV (Data Controller and Data Processor) of the GDPR. Data may be processed by internal or external individuals who are specifically authorised and bound by a confidentiality obligation.

Scope of Data Circulation

The Data may also be processed by third-party companies that perform activities on behalf of the Data Controller, acting as External Data Processors (for example, credit institutions, professional firms, suppliers or consultants who manage and/or assist in the management

PUBLIC



or maintenance of the electronic and/or telematic tools we use, insurance companies that provide insurance services, for the time strictly necessary to ensure optimal service performance). Your Data will only be accessible to staff members of the Company who require it to perform their roles or duties within the organisation. Such personnel will be appropriately instructed to prevent the loss, destruction, unauthorised access, or improper processing of the Data.

Without your explicit consent, the Data Controller may disclose your Data to supervisory authorities, judicial bodies, and any other entities to which disclosure is mandatory under the law (pursuant to Art. 6(b) and (c) of the GDPR).

Nature of Provision

The provision of Data is mandatory for the performance of the activities outlined in paragraph 1 above, **Purposes and Legal Basis of Processing**, letters a), b), c), d), and e). Any refusal to provide such Data will prevent us from properly managing the employment relationship and fulfilling our legal and/or contractual obligations to you.

Please note that for the processing of Data as described above, your consent is not required, as the processing is necessary to comply with legal obligations and/or those arising from the employment contract to which you are a party. Consent is also not required from the Data Subject or their relatives by virtue of applicable law and the current authorisation of the Data Protection Authority for the processing of sensitive Data in private employment relationships. Under these provisions, the processing of special categories of Data, including health-related Data, as well as their communication and disclosure within the limits of the authorisation, is permitted without the written consent of the Data Subject, in order to fulfil legal and regulatory obligations related to the management of the employment relationship. Similarly, consent is not required for the processing of judicial Data, in accordance with the law and the current authorisation of the Data Protection Authority for the processing of judicial Data by private entities, public economic bodies, and public authorities.

PUBLIC



Data Dissemination

Your Data will not be disclosed to any unspecified persons.

Transfer of Data abroad

Data will not be transferred outside the European Union. However, the Data Controller reserves the right, if necessary, to relocate *servers* to countries outside the EU. In such cases, the Data Controller ensures that any transfer of Data outside the EU will be carried out in compliance with Articles 44 and following of the GDPR, as well as other applicable legal provisions, by entering into agreements that guarantee an adequate level of protection, if required.

Video Surveillance

Pursuant to Article 3.1 of the General Provision on Video Surveillance issued by the Data Protection Authority on 29 April 2004 and the General Provision on Video Surveillance of 8 April 2010, we inform you that a video surveillance system is in operation for the purpose of monitoring access and areas subject to potential risks. As this system involves automatic and generalised recording, individuals entering video-surveilled areas cannot avoid being filmed. The sole purpose of this surveillance is to ensure the safety of staff and third parties, protect the company's assets, and assist in identifying perpetrators of offences, thereby facilitating the protection of violated rights in the event of unlawful actions. Through the above-mentioned video surveillance system, Data concerning you, in the form of your images, may also be processed. We inform you that the processing of Data collected via the cameras is conducted in accordance with the provisions of the above-mentioned General Provisions on video surveillance.

The Data collected will not be disclosed or shared and will be retained only for as long as is strictly necessary to achieve the aforementioned purposes, in compliance with applicable laws and regulations.

Data Controller and Data Protection Officer

PUBLIC



With registered office in Viale dell'Innovazione n. 1 – 20126 Milan, MI, Italy, VAT No. 09320630966 – Open Fiber has appointed a Data Protection Officer (DPO or *Data Protection Officer*) pursuant to Article 37 of the GDPR who may be contacted, for matters concerning the processing of your Data, at the following address: dpo.of@openfiber.it

Exercise of Rights

As a Data Subject, we inform you that you may exercise the following rights under the GDPR:

1. a) The right, pursuant to Article 15 of the GDPR, to obtain confirmation as to whether or not Data concerning you is being processed and, if so, to access the 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 has been or will be disclosed, particularly if these recipients are in third countries or international organisations; iv) Where possible, the expected retention period of the Data or, if not possible, the criteria used to determine this period; v) The existence of the Data Subject's right to request rectification or erasure of the Data from the Data Controller, restriction of its processing, or objection to its processing; vi) The right to lodge a complaint with a supervisory authority, pursuant to Articles 77 and following of the GDPR; vii) Where the Data was not collected directly from the Data Subject, all available information about its source; viii) The existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR, and meaningful information about the logic involved, as well as the significance and expected consequences of such processing for the Data Subject; ix) The right to be informed of the existence of adequate safeguards, pursuant to Article 46 of the GDPR, concerning the transfer of Data, if the Data is transferred to a third country or international organisation.
2. b) The Data Subject shall also have the right (where applicable) to exercise their rights under Articles 16-21 of the GDPR, including the Right to rectification, the

PUBLIC



Right to be forgotten, the Right to restriction of processing, the Right to Data portability, and the Right to object.

We inform you that our Company is committed to responding to your request no later than one month from the date of its receipt. This deadline may be extended depending on the complexity or number of requests, and the Company will inform you of the reason for any extension within one month of your request. The outcome of your request may be provided to you in writing, either in hard copy or in electronic form.

Methods of Exercising Rights

The Data Subject may at any time exercise the aforementioned rights and the updated list of Data Processors by sending a request to the following e-mail addresses: privacy@openfiber.it or dpo.of@openfiber.it

PUBLIC