INFORMATION NOTICE OF JOB APPLICANTS

Open Fiber S.p.A., as the Data Controller of personal data (hereinafter "**Controller**" or "**Open Fiber**"), informs you, pursuant to Articles 13 and 14 of EU Regulation 2016/679 (hereinafter "**GDPR")** that personal data (hereinafter "**Data**") you voluntarily provide to Open Fiber or that have been acquired within the Open *Fiber Referral* program, through the transmission of your *CV* by an Open Fiber employee, may be processed in the manner and for the purposes indicated below.

In this context, we invite you not to indicate "special categories of data" defined pursuant to Article 9 of the GDPR.

We inform you, in any case, that any special categories of data you voluntarily provide to Open Fiber, through the submission of your *Curriculum Vitae* and, where applicable, the completion of the section "*Membership in the Protected Categories pursuant to Law 68/99 - Section dedicated to those wishing to report membership in protected categories (optional)"* in the "work with us" area on the Open Fiber website, will be processed only if necessary to fulfill legal obligations regarding labor law.

We also invite you not to provide data relating to criminal convictions or offenses concerning you defined pursuant to art. 10 of the GDPR.

Purpose of processing

The Data you provide, or acquired through a report from an Open Fiber employee, are:

- your personal and contact details;
- data relating to your residence/domicile;
- data relating to your study path;
- data relating to your previous work experience;
- your *Curriculum Vitae*;
- within the limits required by applicable regulations, data belonging to the "special categories" referred to in art. 9, para. 1 of the GDPR and, specifically, data relating to belonging to the so-called protected categories.

Such Data will be used for the following purposes:

a. carry out recruitment and/or selection activities for personnel;
b. communicate information related to recruitment and/or personnel selection activities.

We inform you that, if you are included in your *Curriculum Vitae*, Open Fiber may process your image to better link it with your name, always for purposes related to recruitment and/or personnel selection activities.

Data retention periods and Type of data processed

Data concerning you will be stored according to the following criteria:

- for a period not exceeding that necessary to achieve the purposes for which they are processed;
- for a period not exceeding that necessary to fulfill regulatory obligations.

More specifically:

- for the purpose referred to in point a) within one year from the submission of the application or from the submission by an employee of Open Fiber;
- for the purpose referred to in point b) within one year from the date of collection of personal contact data, and in any case until the exercise of the right to object;

Open Fiber S.p.A. - sole shareholder company, subject to the management and coordination of Open Fiber Holdings S.p.A. – Registered Office: Viale dell'Innovazione 1 – 20126 Milan – Milan Business Register, Tax Code and VAT Number 09320630966 R.E.A. MI 2083127 Share capital Euro 250,000,000 r.v.

Regarding the type of data processed:

- for the purpose referred to in point a), data present on the *curriculum vitae* and, where applicable, data uploaded by the data subject to the "work with us" area on the Open Fiber website will be processed;
- for the purpose referred to in point b), contact data (name, surname*, email, and* application history) will be processed.

Legal basis and methods of use of the Data

The legal basis for processing is identified:

- for the purpose referred to in point a) in the execution of pre-contractual agreements *pursuant to* Art. 6, para. 1, letter b) of the GDPR; for the particular category of personal data, where communicated, will be processed pursuant to Art. 9, para. 2, lett. b) GDPR;
- for the purpose referred to in point b) in the legitimate interest of the Data Controller *pursuant* to art. 6, para. 1, letter f) of the GDPR, aimed at contacting the user in case of new professional opportunities to which they may be interested;

Data processing is carried out using paper media and electronic tools with measures suitable to ensure the security and confidentiality of the Data aimed at preventing unauthorized access, loss, or destruction, 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 subjects, internal or external, specifically authorized and committed to confidentiality.

Scope of Data Circulation

The Data may also be processed by third-party companies that carry out activities on behalf of the Data Controller, in their capacity as data processors (for example: credit institutions, professional firms, suppliers/consultants who manage and/or participate in the management and/or maintenance of the electronic and/or telematic tools we use, as well as insurance companies for the provision of insurance services, respecting the time strictly necessary for the optimal execution of such service). In particular, your personal data may be communicated to the Supplier identified and already appointed as Data Processor, for the purpose of tests aimed at selection and, if necessary, hiring. Your Personal Data will be made accessible only to those within Open Fiber who need it in relation to the exercise of their duties or hierarchical positions. These subjects will be properly trained to prevent loss, destruction, unauthorized access, or unauthorized processing of the Data themselves. Without your express consent (*pursuant to* art. 6 letters b) and c) of the GDPR), the Controller may communicate your Data to supervisory bodies, judicial authorities, as well as to all other parties to whom communication is mandatory under an express legal provision.

Nature of the award

Providing your Data, excluding specific data, for the purposes highlighted in points (a) and (b) is mandatory. Any refusal by you to provide such Data and/or providing inaccurate and/or incomplete information may result in Open Fiber being unable to:

1. carry out recruitment and/or selection activities for personnel;
2. communicating with you regarding recruitment and/or personnel selection activities.

Data Dissemination

Your Data will not be disclosed to unspecified parties.

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Transfer of Data abroad

The Data will not be transferred outside the European Union and the European Economic Area. It is understood in any case that the Controller, if necessary, will have the right to move the location of the *servers* to *non-EU countries. In such cases, the Controller hereby ensures that the transfer of extra-EU Data* will take place in accordance with Articles 44 et seq. of the GDPR and applicable legal provisions, by concluding, if necessary, agreements that guarantee an adequate level of protection.

Data Protection Officer

The Data Controller is Open Fiber S.p.A., with registered office at Viale dell'Innovazione 1 – 20126 Milano, VAT number 09320630966.
Open Fiber has appointed the Data Protection Officer pursuant to Art. 37 of the GDPR, who can be contacted at the following address: dpo.of@openfiber.it.

Exercise of rights

As a data subject, we inform you that you have the possibility to exercise the rights provided by the GDPR, specifically:

a. the right, pursuant to art. 15, to obtain confirmation as to whether or not data concerning you is being processed and, if so, to obtain access to the Data and the following information: i) the purposes of the processing ii) the categories of Data in question; iii) the recipients or categories of recipients to whom the Data have been or will be disclosed, in particular if third countries or international organizations; iv) where possible, the intended retention period of the Data or, if not possible, the criteria used to determine such period; v) the existence of the data subject's right to request the Data Controller to rectify or erase the Data or to restrict processing or to object to their processing; vi) the right to lodge a complaint with a supervisory authority, pursuant to arts. 77 et seq. of the GDPR; vii) if the Data are not collected from the data subject, all available information about their origin; viii) the existence of automated decision-making, including profiling referred to in Art. 22, paragraphs 1 and 4 of the GDPR, and, at least in such cases, meaningful information about the logic used, as well as the importance 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 relating to the transfer, if the Data are transferred to a third country or an international organization;

b. the Data Subject will also (where applicable) have the possibility to exercise the rights under arts. 16-21 of the GDPR (right to rectification, right to be forgotten, right to restriction of processing, right to
data portability, 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 deadline may be extended depending on the complexity or number of requests, and Open Fiber will explain the reason for the extension within one month of your request. The outcome of your request may be provided to you in writing, in paper format, or electronically.

Methods of exercising rights

The Data Subject may at any time exercise the aforementioned rights and request the updated list of data processors by sending a request to the following email addresses: privacy@openfiber.it or

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dpo.of@openfiber.it.

If you believe that the processing of your Data is carried out in violation of the provisions of the Regulation, you have the right to lodge a complaint with the Privacy Authority, as provided for in art. 77 of the Regulation itself, or to take appropriate judicial action (art. 79 of the Regulation) following the procedures and instructions published on the Authority's official website: www.garanteprivacy.it.

The Data Controller

Open Fiber S.p.A.

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