

## **Privacy policy pursuant to data protection regulations concerning the Shareholders' Meeting of INWIT S.p.A.**

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter also "GDPR"), INWIT S.p.A. (hereinafter also referred to as "INWIT", "the Company" or "the Data Controller"), in its capacity as Data Controller, hereby provides you with the following information on the processing of personal data provided by you in relation to your participation in the Shareholders' Meeting.

### **1. Data Controller and Data Protection Officer**

The Data Controller is INWIT S.p.A. with registered office at Largo Donegani n. 2, 20121, Milan.

The Data Protection Officer, appointed by the Data Controller, can be contacted by e-mail at the following address: [dpo@inwit.it](mailto:dpo@inwit.it).

### **2. Categories of personal data, purposes and legal bases of the processing**

INWIT, as Data Controller, may collect and process the following categories of personal data:

- identification data, such as name, surname, date and place of birth, tax code, identification document;
- contact data, such as home address, telephone number, e-mail.

The Data Controller will process the personal data you provide for:

- i. the performance of the mandatory fulfilments in connection with the process of managing and organising your participation in the Shareholders' Meeting in the manner provided for in the notice. This processing is necessary for compliance with relevant regulatory obligations incumbent on the Data Controller, pursuant to Art. 6, para. 1, lett. c) of the GDPR, in order to ensure the exercise - also by persons, such as the Designated Representative - of the rights provided for by the applicable legislation in connection with the conduct of the Shareholders' Meeting;

#### **Infrastrutture Wireless Italiane S.p.A.**

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Tax code, VAT number and registration with the  
Milan Register of Companies 08936640963  
REA number MI 2057238  
Share Capital € 600,000,000.00

- ii. meet internal administrative, financial and accounting needs. Such processing is necessary for the purposes of the legitimate interest of the Data Controller under Art. 6, para. 1(f) of the GDPR;
- iii. exercise and establish a right and satisfy any defence needs in court and out of court. Such processing is necessary for the purposes of the legitimate interest of the Data Controller under Art. 6, para. 1(f) of the GDPR;
- iv. comply with any further regulatory obligations incumbent on the Data Controller. Such processing is necessary for compliance with legal obligations to which it is subject under Art. 6, para. 1(c) of the GDPR.

### **3. Nature of data communication**

The communication of your personal data is optional, however, failure to communicate your personal data or the partial communication thereof may result, for you, in the impossibility of participating in the Shareholders' Meeting and, for the Data Controller, in the impossibility of fulfilling the obligations prescribed by current legislation.

### **4. Methods and logic of data processing**

Data processing is carried out manually, by automated means and/or by means of computerised and telematic tools, with logic related to the aforementioned purposes and, in any case, in such a way as to guarantee the security and confidentiality of the data.

Your personal data, including those relating to the audio and video recordings of the Shareholders' Meeting and to the transcription in real time by means of computerised electronic stenotyping, will be collected and processed both electronically and on paper – with the aid of automated means – and will be stored in a form that allows for the identification of the person concerned.

### **5. Data Retention**

Your personal data will be stored, in accordance with the principles of minimisation and limitation of storage, for the time strictly necessary to achieve the aforementioned purposes and in any case for a period not exceeding 10 years from the date of the Shareholders' Meeting. This period, in addition to being consistent with the regulatory framework on appeals against shareholders' resolutions, takes into account the requirements of the Issuers' Regulation approved by Consob with Resolution No. 11971 of 14 May 1999 on the publication of regulated information on the website of issuers.

After the period necessary for the pursuit of the above-mentioned purposes, personal data will be permanently deleted or rendered anonymous.

The Data Controller reserves the right, in any event, to retain your personal data also for the purpose of meeting any defence requirements and to fulfil any applicable regulatory obligations.

## **6. Scope of data communication and dissemination**

For the above-mentioned purposes, the personal data collected will be processed by: (i) employees of INWIT, duly authorised to data processing; (ii) third parties or other entities carrying out activities on behalf of the Data Controller. These subjects will be identified as autonomous Data Controllers or designated as Data Processors pursuant to Article 28 GDPR.

Finally, for the same purposes, personal data may be communicated to bodies, institutions and authorities in accordance with applicable legislation.

## **7. Rights of the data subject**

We inform you that, as a data subject, you have the right to lodge a complaint with the Supervisory Authority and that you may assert the rights listed below by addressing a specific request to the Data Controller.

In particular, you may exercise the following rights:

Art. 15 – Right of access – the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and, if so, to obtain access to the personal data and information concerning the processing.

Article 16 – Right of rectification – the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you may also obtain the integration of incomplete personal data, including by providing a supplementary declaration.

Art. 17 – Right to erasure (right to be forgotten) – the right to obtain from the Data Controller the erasure of personal data concerning you without undue delay, and the Data Controller is obliged to erase your personal data without undue delay.

Art. 18 – Right to restriction of processing – the right to obtain from the Data Controller the restriction of processing when specific cases occur.

Art. 20 – Right to data portability – the right to obtain the portability of personal data, i.e. to receive personal data concerning him/her in a structured, commonly

used and machine-readable format or to request its direct transfer to another data controller, where this is technically possible and when specific cases apply.

Art. 21 - Right to object - the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data on the basis of legitimate interest.

Art. 77 - Right to lodge a complaint with the supervisory authority - the right to lodge a complaint with the Garante per la Protezione dei Dati Personali at the contacts indicated on the site [www.garanteprivacy.it](http://www.garanteprivacy.it) if the conditions are met.

We inform you that the Data Controller undertakes to reply to your request at the latest one month after receipt of the request. This deadline may be extended by two months if necessary, taking into account the complexity or number of requests received.

These rights may be exercised by means of a specific request to be addressed by registered letter or by sending an e-mail to [dpo@inwit.it](mailto:dpo@inwit.it).

**INWIT S.p.A.**