

Privacy policy pursuant to data protection regulations concerning INWIT's customers

Dear Customer,

Pursuant to Articles 13 and 14 of Regulation 2016/679/EU ("General Data Protection Regulation", hereinafter also "GDPR"), Infrastrutture Wireless Italiane S.p.A., in its capacity as Data Controller (hereinafter also "**INWIT**" and/or "the **Data Controller**"), hereby provides you with the following information on the processing of your personal data within the scope of the relationship existing with the Company.

The processing of your personal data will be based on the principles of correctness, lawfulness, transparency, relevance, accountability and may be carried out using paper and computer media, in any case, suitable to guarantee their security and confidentiality and in any case by using procedures that avoid the risk of loss, theft, unauthorised access, unlawful use, unwanted modifications and dissemination, in compliance with the regulations in force.

This Privacy Policy applies to the personal data of legal representatives, employees and/or other contact persons of the customer (hereinafter also referred to as "**Customer**") involved, for any reason and regardless of the type of contract, in the relationship existing with INWIT, which may be processed for the performance of activities related to the relationship itself.

1. Data Controller and Data Protection Officer

The Data Controller is Infrastrutture Wireless Italiane S.p.A., with registered office in Largo Donegani 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.

2. Categories of personal data

INWIT, as Data Controller, may process, by way of example, the following categories of personal data, collected at the time of signing the contract or during the existing relationship and relating to the representatives, employees and/or contact persons involved in the performance of the relationship:

- Identification and personal data (such as name, surname, date and place of birth, fiscal code, identity card/passport number);
- Contact data (such as address, telephone number, e-mail).

Infrastrutture Wireless Italiane S.p.A.

Registered office: Milan, Largo Guido Donegani - 20121, Milan
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adminpec@inwit.telecompost.it

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

It is recommended not to provide personal data that are not necessary for the pursuit of the purposes set out in this Policy.

3. Purposes and legal basis of processing

Your personal data will be processed for purposes related to:

- a) Negotiation, conclusion and execution of the contract to which you or the company you represent is a party or the execution of pre-contractual measures. The legal basis for the processing is therefore the existing contract with INWIT (pursuant to art. 6 lett. b) GDPR);
- b) Customer satisfaction survey activities with reference to the services or products offered by INWIT. In this case, the legal basis for the processing can be found in the legitimate interest of the Data Controller pursuant to Article 6(f) of the GDPR, attributable to the desire to improve the general level of services offered to its customers;
- c) Creation of a digital identity, where it is necessary to access INWIT's systems or applications during the contractual relationship. The legal basis is to be found in the performance of the contract to which you or the company you represent is a party or in the performance of pre-contractual measures pursuant to Art. 6(b) GDPR.

Finally, INWIT S.p.A. may process your personal data in order to assert or defend a right in court. The legal basis can be found in the pursuit of a legitimate interest of the data controller (pursuant to Art. 6 para. 1(f) of the GDPR), as well as to comply with orders of the competent authorities or obligations under applicable laws, regulations or legislation on the matter, referred to in Art. 6 para. 1(c) of Regulation (EU) 2016/679.

4. Compulsory or voluntary nature of data communication

The provision of personal data required for contractual purposes is necessary for the negotiation, conclusion and execution of the contractual relationship. Therefore, failure to provide the data, in part or inexactly, may make it impossible for the data controller to pursue the aforementioned purposes.

The processing of data for the purpose b) is not compulsory and the Customer may object to it at any time in the manner indicated in this Policy or via the unsubscribe link at the bottom of each communication sent for that purpose. Should the Customer object to such processing, their personal data shall no longer be processed for the said purpose, which shall in any case not affect the lawfulness of the processing carried out up to that point.

5. 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.

6. Data retention

INWIT retains your personal data for the time provided for by company policy and in any case for a period of time that does not exceed the achievement of the purposes for which they were collected or subsequently processed, as well as for the period provided for by law for administrative purposes, for the handling of any complaints/litigation or for criminal law purposes.

At the end of the retention period, personal data will be deleted or anonymised.

7. Scope of data communication and dissemination

Your personal data will be processed by employees of INWIT who, within the scope of their work duties, act as authorised processors of personal data and are instructed to do so by the Data Controller.

For the purposes set out above, the Data Controller may communicate the personal data collected to third parties to whom INWIT entrusts activities and services (or part of them). These subjects will be identified as Autonomous Data Controllers or designated Data Processors pursuant to Article 28 of the GDPR. In such cases, only the personal data necessary for the provision of the requested service will be disclosed, and a contract will be concluded requiring them not to use the data except in accordance with the Controller's specific instructions and to comply with appropriate security measures.

Your personal data may also be communicated to public administrations, supervisory bodies and judicial authorities for the purposes of the law and, in general, to all parties entitled by law to request such data.

8. Data transfer outside the EU

Your personal data are stored on servers located in the EU. It is in any case understood that the Controller, if necessary, will be entitled to move the servers also outside the EU. In this case, the Data Controller hereby ensures that the transfer of data outside the EU will take place in accordance with the applicable legal provisions and in particular those set out in Title V of the GDPR or subject to the signing of standard contractual clauses approved and adopted by the European Commission.

Apart from the above-mentioned cases, the data provided will not be transferred outside the EU.

9. 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 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.

INWIT S.p.A.