WS PORTAL PRIVACY POLICY

(Articles 12-14 of EU Regulation No. 2016/679)

V.09.26

DATA CONTROLLER

Fastweb S.p.A. – VAT number 12878470157 with registered office in Piazza Adriano Olivetti n. 1, Milan 20139 which can be contacted by e-mail at WHOLESALE.Privacy@fastweb.it.

DATA PROTECTION OFFICER ("DPO")

Pursuant to Article 37 of EU Regulation No. 2016/679 ("GDPR"), Fastweb has also designated a Data Protection Officer ("**DPO")** who can be contacted at the following e-mail address: dpo@fastweb.it.

WHO IT APPLIES TO

Fastweb intends to inform you of the processing of personal data that, as data controller pursuant to Regulation (EU) no. 2016/679 (hereinafter also "GDPR"), it carries out when you register and access the WS Portal (hereinafter "PWS") made available by Fastweb to allow you to independently manage numerous activities, such as, by way of example, checking the availability of services for the order of the same, monitor provisioning status, open tickets in the event of a disruption and take advantage of trouble-shooting tools, as well as verify and download invoices.

WHAT DATA WE MAY PROCESS

Common personal data

- Name and surname
- Email address
- Phone Number
- User ID

Application logs

Specifically:

- User ID
- Email address
- Timestamp
- IP address
- Type of action performed
- Object and entity affected by the action (e.g., record, document)

If any personal data you provide relates to third parties, please ensure that these parties have been informed in advance and adequately about the methods and purposes of processing indicated herein. With respect to these hypotheses, you act as an independent Data Controller, assuming all legal obligations and responsibilities.

PURPOSES OF PROCESSING, LEGAL BASES AND STORAGE TIMES

TREATMENT 1: Creation of utilities	
In order to allow access to PWS by the customers' operational staff and to ensure the management of various activities as described above (see "To whom it applies"), it is necessary to create an account (username in e-mail format and password) which must be nominal (name and surname), i.e. it must identify a natural person, and personal, i.e. it cannot be transferred and/or shared with other subjects.	
LEGAL BASIS:	The processing is necessary for the performance of a contract to which the data subject is a party or for the execution of pre-contractual measures pursuant to Article 6, paragraph 1, letter b) of the GDPR.
STORAGE TIMES:	User accounts are deactivated upon request or after 90 days of inactivity on the Portal. Deactivated accounts remain in the system for a limited time to allow for possible reactivations: one year after deactivation, personal data related to the accounts is obfuscated
NATURE OF THE PROVISION:	The provision is to be considered necessary for the provision of the requested service. Failure to provide such data will make it impossible to access PWS.
TREATMENT 2: Technical assistance and operational support	
To ensure support in cases of reports by users of anomalies and/or technical problems of visibility on PWS, Fastweb processes personal data to investigate the problem and provide resolution as soon as possible.	
LEGAL BASIS:	The processing is necessary for the performance of a contract to which the data subject is a party or for the execution of pre-contractual measures pursuant to Article 6, paragraph 1, letter b) of the GDPR.
STORAGE TIMES:	For the only time necessary to resolve the report received.
NATURE OF THE PROVISION:	The provision is to be considered necessary for the provision of the requested service. Failure to provide such data will make it impossible to access PWS.
TREATMENT 3: Sending operational/techinical notifications	
All information regarding the status of the order is always available on PWS. Fastweb also provides a service for sending notifications via e-mail on the progress of the service.	
LEGAL BASIS:	The processing is necessary for the performance of a contract to which the data subject is a party or for the execution of pre-contractual measures pursuant to Article 6, paragraph 1, letter b) of the GDPR.
STORAGE TIMES:	Until the user is deactivated on PWS.
NATURE OF THE PROVISION:	The provision is to be considered necessary for the provision of the requested service. Failure to provide such data will make it impossible to access PWS.
TREATMENT 4: Continuous monitoring of accesses and activities	
Fastweb – in order to ensure the smooth running of the company's business and the protection of company rights, processes and assets in compliance with the regulations in force, including in court or in a preparatory phase to the trial itself – puts in place security controls aimed at ensuring a compliant and traceable use of PWS. These activities consist, by way of example, of: - compliance control of utilities; - analysis of accesses made by authorized users; - recording of the operations carried out – with particular attention to the nature of the action performed and the context in which it takes place; - verification of the consistency between user profiles and the activities carried out within the application environment; - limitation of the duration of user sessions, with automatic logoff after 3 hours of inactivity; - restriction of access by IP address.	
LEGAL BASIS:	The processing is necessary to pursue the legitimate interest of Fastweb pursuant to Article 6, paragraph 1, letter f) of the GDPR.
STORAGE TIMES:	Application logs are kept for 36 months. In the case of out-of-court and/or judicial proceedings, personal data are kept for the entire duration of the same until the exhaustion of the terms of availability of judicial protections and/or appeal actions.

NATURE OF THE PROVISION:	The processing depends on Fastweb's legitimate interest in protecting its business assets. Consent is not required for such processing, but in any case the right to object is guaranteed

TO WHOM WE DISCLOSE PERSONAL DATA

For the purposes referred to in the previous points, Personal Data may be communicated, in compliance with the rights and guarantees provided for by current legislation, to the following subjects:

a. to its parent companies and/or subsidiaries;
b. to third parties – such as professionals and/or consultants – whose support Fastweb uses for purposes strictly related and connected to those for which the data were collected;
c. to Public Authorities, Supervisory and Control Bodies or other parties indicated by them, by virtue of regulatory provisions or measures issued by them.

The above subjects process personal data as separate Data Controllers or as Data Processors specifically designated by Fastweb with the guarantees referred to in art. 28 of the GDPR.

Within Fastweb, Personal Data are made accessible only to authorised personnel who need it by reason of their activity and the tasks performed. These subjects – employees, consultants, collaborators and/or any other "natural person" placed under the direct authority of Fastweb – carry out their activities as authorized and on the basis of the instructions given pursuant to Article 29 of the GDPR by the Data Controller.

TRANSFERS OUTSIDE THE EU

In the case of transfers outside the European Union, the same will take place first of all to countries for which there is an adequacy decision of the EU Commission, such as Switzerland (decision of 26 July 2000). In other cases, the transfer will be subject to adequate guarantees according to art. 46, 47 and 49, par. 2, of the GDPR, as model clauses adopted and approved by the EU Commission, codes of conduct and certification mechanisms.

The interested party may request information in this regard, including a copy of the data or an indication of the place where they have been made available, by contacting the contact points indicated at the bottom of this policy.

PROCESSING METHODS

Fastweb carries out the processing in compliance with the GDPR provisions as well as any other implementing legislation and any other applicable measure adopted by the Italian Data Protection Authority (collectively, the "Privacy Legislation"), according to principles of correctness, lawfulness, transparency and protection of your privacy and rights.

The processing is carried out manually and/or electronically, in compliance with adequate security measures, by Fastweb, in its capacity as Data Controller, by its external data processors and by subjects placed under their authority and adequately trained, as well as by the other recipients mentioned above. There is no automated decision-making, including profiling.

Furthermore, it should be noted that the processing of personal data for the specified purposes may be carried out through Artificial Intelligence (AI) algorithms, following the appropriate implementation of technical and organizational measures – such as data minimization and pseudonymization – designed to ensure a level of security for personal data appropriate to the risk and to protect the rights of the data subject. In any case, such processing will be conducted in compliance with the principles of minimization, transparency, human oversight, and with the applicable regulations on Artificial Intelligence (AI) (EU Reg. No. 1689/2024) and personal data protection.

WHAT ARE THE RIGHTS OF THE DATA SUBJECTS

In your capacity as Data Subject and in relation to the processing described in this Policy, you may exercise, at any time, the rights provided for in Articles 15 to 22 of the GDPR, where applicable and within the limits established by Article *2-undecies* of Legislative Decree No. 196 of 30 June 2003, as amended ("Personal Data Protection Code"), by sending a request to the e-mail address WHOLESALE.Privacy@fastweb.it.

In particular: the right of access to Personal Data, the right to request their rectification, erasure or limitation of the processing concerning you, within the limits provided for by art. 17 of the GDPR; the right to object to their processing at any time within the limits provided for by art. 21 of the GDPR, the right to data portability in the cases provided for by the Privacy Legislation. The revocation, cancellation and opposition does not affect the lawfulness of the processing carried out previously.

The data subject also has the right to lodge a complaint with the Guarantor for the protection of personal data. The procedures for submitting the appeal are indicated on the institutional website of the Guarantor.