PRIVACY POLICY FOR END CUSTOMERS OF ANOTHER TELECOMMUNICATIONS OPERATOR IN THE CONTEXT OF THE (MOBILE) MIXED WHOLESALE NETWORK

(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, as a Wholesale operator, in making its network infrastructure available – with a specific telecommunications service contract for mobile telephony – to other operators ("Partner Operator"), processes – limited to what is described below – as an independent data controller pursuant to Regulation (EU) no. 2016/679 (hereinafter also "**GDPR"),** the personal data **of end customers who have requested a mobile network service from the Partner Operator.**

Fastweb processes such personal data 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 and transparency and protection of your privacy and rights.

WHAT PERSONAL DATA WE MAY PROCESS

The personal data processed ("**Personal Data**") processed by Fastweb are:

Personal Data collected by the Partner Operator (source from which the personal data originates)

The Partner Operator with whom you have a mobile network service contract must provide us with the following Personal Data in order to provide you with the service:

- Identification data (tax code if you have requested the portability of your number)

Technical identification data

As part of the mobile network services:

- Technical SIM identifiers (IMSI, ICCD)
- Phone Number (MSISDN)
- Technical Phone Identifier (IMEI)

Fastweb does not have access to the Customer Base of the Partner Operator.

PURPOSES OF PROCESSING, LEGAL BASES AND STORAGE TIMES

PURPOSE 1: Activation of the service and Mobile Number Portability	
Personal Data are processed as part of the technical operations necessary to implement the service you have requested under contract from the Partner Operator. The operations include the activation and configuration of the service and any requests for portability of your number (Mobile Number Portability, in short "MNP").	
LEGAL BASIS:	The processing is necessary for the performance of a contract with the Partner Operator pursuant to Article 6, paragraph 1, letter b) of the GDPR.
STORAGE TIMES:	On the systems, to ensure the correct functioning of the network, the technical identification data remain until the SIM is deactivated or in the event of a request for MNP out to another operator.
PURPOSE 2: Technical assistance (so-called Assurance)	
Personal Data are processed as part of the technical operations necessary to ensure the resolution of technical problems and maintenance interventions.	
LEGAL BASIS:	The processing is necessary for the performance of a contract with the Partner Operator pursuant to Article 6, paragraph 1, letter b) of the GDPR.
STORAGE TIMES:	On trouble ticketing systems they remain for 1 month.
PURPOSE 3: Legal obligations	
Personal Data are processed to comply with the obligations provided for by laws, regulations, EU legislation, orders and requirements of the competent regulatory authorities, including mandatory performance obligations (e.g. interception).	
LEGAL BASIS:	The processing is necessary to comply with a legal obligation to which Fastweb is subject pursuant to Article 6, paragraph 1, letter c) of the GDPR
STORAGE TIMES:	Times provided for by the specific law.
PURPOSE 4: Protection of company assets	
Personal Data are processed 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 judgment itself, including the exercise of a debt collection action against the Partner Operator.	
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:	In the case of out-of-court and/or judicial proceedings, for the entire duration of the same until the exhaustion of the terms of availability of judicial protections and/or appeal actions.

TO WHOM WE DISCLOSE PERSONAL DATA

Within the limits of the purposes described above, Fastweb may communicate personal data, in compliance with the rights and guarantees provided for by current legislation, to the following subjects:

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

The subjects belonging to the above categories 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 authorized 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.

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, para. 2, of the GDPR, such 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

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.

It should also be noted that the processing of personal data for the purposes indicated may take place through Artificial Intelligence (AI) algorithms, following the appropriate application of technical and organizational measures – such as minimization and pseudonymization – suitable for ensuring a level of security of personal data appropriate to the risk and the protection of the rights of the data subject. In any case, such processing will take place in compliance with the principles of minimization, transparency, human review and the regulations in force 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 a data subject, you may exercise, at any time, the rights provided for by 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") towards the Partner Operator with whom you have a fixed network service contract, to the contacts made available by the latter in its policy.

Fastweb may respond to your requests to exercise your rights by contacting us at the following address: WHOLESALE.Privacy@fastweb.it. We remind you that Fastweb, as a wholesale operator, does not have your personal data: for mobile network services it only uses technical identifiers (IMEI, MSISDN, IMSI, ICCID) necessary for the provision and management of the service. We may therefore request additional information from you, and the Partner Operator, to verify your identity.

As a data subject, you also have 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.