WHOLESALE CUSTOMER (OLO/MVNO) PRIVACY POLICY

(arts. 12-14 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 via e-mail at WHOLESALE.Privacy@fastweb.it.

DATA PROTECTION OFFICER ("DPO")

Based on art. 37 of EU regulation no. 2016/679 ("GDPR"), Fastweb has also appointed a Data Protection Officer ("**DPO**") who can be contacted at the following e-mail address: dpo@fastweb.it.

WHO DOES IT APPLY 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 performs for the purposes related to the establishment and management of the contractual relationship with the Wholesale Customer in compliance with the GDPR provisions as well as with any other implementing legislation and any other applicable measure adopted by the Guarantor Authority for the protection of personal data (collectively, the "**Privacy Legislation**"), according to principles of fairness, lawfulness and transparency and protection of your privacy and your rights.

Your personal data will be processed as a legal representative of the Wholesale Customer or a person who performs work or professional activities or collaborates with the Wholesale Customer (employee/collaborator). The Wholesale Customer — as a legal entity — undertakes to guarantee the interested party full knowledge of the essential elements of this information.

WHAT PERSONAL DATA CAN WE PROCESS

The personal data processed ("**Personal Data**") are essentially those provided as part of the process of establishing the commercial and/or collaboration relationship and the signing of pre-contractual and contractual agreements between Fastweb and the Wholesale Customer. In particular:

a) Identifying data: e.g. name, surname, tax code/VAT number;
b) Contact data: e.g. residence and/or home address, e-mail and/or PEC address, landline and mobile telephone number.

PURPOSE OF THE TREATMENTS, LEGAL BASES AND STORAGE TIMES

PURPOSE 1: Management of the contractual relationship	
Personal Data is processed for the fulfillment of activities aimed at establishing and executing the commercial and/or contractual relationship between Fastweb and the Wholesale Customer, for the fulfillment of pre-contractual activities and/or the execution of the signed contract.	
LEGAL BASIS:	The processing is necessary for the execution of a contract to which the interested party is a party or for the execution of pre-contractual measures pursuant to art. 6, paragraph 1, letter b) of the GDPR
STORAGE TIMES:	For the entire duration of the contractual relationship and for 10 years after the end of the contractual relationship
NATURE OF THE TRANSFER:	The provision is to be considered necessary for the provision of the requested service. Failure to provide it will make it impossible to enter into or execute the contract.

PURPOSE 2: Administrative-accounting obligations	
Personal Data is processed to fulfill administrative and accounting obligations - such as accounting and treasury management, as well as invoicing (for example the verification and recording of invoices) - in accordance with what is required by current legislation.	
LEGAL BASIS:	The processing is necessary to fulfill a legal obligation to which Fastweb is subject pursuant to art. 6, paragraph 1, letter c) of the GDPR
STORAGE TIMES:	For the entire duration of the contractual relationship and for 10 years after the end of the contractual relationship
NATURE OF THE TRANSFER:	The provision is to be considered necessary for the provision of the requested service. Failure to provide it will make it impossible to enter into or execute the contract.
PURPOSE 3: Legal obligations	
Personal Data is processed to fulfill the obligations established by laws, regulations, EU regulations, orders and prescriptions of the competent regulatory authorities.	
LEGAL BASIS:	The processing is necessary to fulfill a legal obligation to which Fastweb is subject pursuant to art. 6, paragraph 1, letter c) of the GDPR
STORAGE TIMES:	Times provided for by the specific law.
NATURE OF THE TRANSFER:	The provision is to be considered necessary for the provision of the requested service. Failure to provide it will make it impossible to enter into or execute the contract.
PURPOSE 4: Protection of corporate assets	
Personal Data is processed in order to ensure the smooth running of business activities and the protection of company rights, processes and assets in compliance with current regulations, even in court or in a preparatory phase for the trial itself, including the exercise of a debt collection action against the interested party.	
LEGAL BASIS:	The processing is necessary to pursue Fastweb's legitimate interest pursuant to art. 6, paragraph 1, letter f) of the GDPR
STORAGE TIMES:	In the case of extrajudicial and/or judicial proceedings, for the entire duration of the same until the terms of availability of judicial protection and/or appeal actions are exhausted.
NATURE OF THE TRANSFER:	The provision is to be considered necessary for the provision of the requested service. Failure to provide it will make it impossible to enter into or execute the contract.
PURPOSE 5: Sending technical communications	
Personal Data is processed as part of sending technical communications to update the services provided by Fastweb, with the aim of providing an optimal service to the Wholesale Customer without promotional purposes.	
LEGAL BASIS:	The processing is necessary to pursue Fastweb's legitimate interest pursuant to art. 6, paragraph 1, letter f) of the GDPR
STORAGE TIMES:	For the entire duration of the contractual relationship, except for the right to object
NATURE OF THE TRANSFER:	The processing depends on Fastweb's legitimate interest to provide an optimal service to its Wholesale Customers, providing information on products and services sold by Fastweb. Consent is not necessary for this treatment, but in any case the right to object is guaranteed

WHO DO WE COMMUNICATE PERSONAL DATA TO

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

a. to its parent and/or subsidiary companies;
b. to third parties — such as other telecommunications infrastructure operators when the nature of the technology offered so requires and the network service is offered on a mixed network, providers of administrative, financial, accounting, IT services, etc., system integrator, professionals and/or consultants — whose support Fastweb makes use of for purposes strictly related to and connected to those for which the data were collected;
c. to Public Authorities, to the Supervisory and Control Bodies or to other subjects indicated by the latter, by virtue of regulatory provisions or measures issued by them.

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

Within Fastweb, Personal Data is made accessible only to authorized personnel who need it because of their activity and the tasks carried out. 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 art. 30 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 appropriateness 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 articles 46, 47 and 49, paragraph 2, of the GDPR, such as standard 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 were made available, by contacting the contact points indicated at the bottom of this information.

METHODS OF PROCESSING

The treatments are carried out manually and/or electronically, in compliance with appropriate security measures, by Fastweb, 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.

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 INTERESTED PARTIES

In your capacity as an interested party and in relation to the treatments described in this Policy, you may exercise, at any time, the rights provided for by art. From 15 to 22 of the GDPR, where applicable and within the limits established by art. 2- *undecies* of Legislative Decree 30 June 2003, n. 196 and subsequent amendments ("Code regarding the protection of personal data"), by sending a specific request to the e-mail address WHOLESALE.Privacy@fastweb.it.

In particular: right of access to Personal Data, right to request their correction, cancellation or limitation of the processing that concerns you, within the limits set out in art. 17 of the GDPR; the right to object to their processing at any time within the limits set out in art. 21 of the GDPR, the right to data portability in the cases provided for by the Privacy Legislation. Revocation, cancellation and opposition are without prejudice to the lawfulness of the processing carried out previously.

The interested party also has the right to lodge a complaint with the Guarantor for the protection of personal data. The procedures for filing the appeal are indicated on the Guarantor's institutional website.