

Information to Business Customer “NATURAL PERSON” provided by TIM pursuant to the laws regarding the protection of Personal Data

Dear Customer,

in pursuance to Regulation 2016/679/UE (General Data Protection Regulation – hereinafter as “GDPR”) and the applicable provisions of Legislative Decree 196/2003 (so-called Personal Data Protection Code), Telecom Italia S.p.A., hereinafter as “TIM”, herewith provides you with the information regarding the processing of your personal data.

1) Purposes for which processing of personal data is necessary and related legal basis

Your personal data, including those relating to telephone and/or electronic communications traffic (so-called “traffic data”), that you have provided and/or which we have acquired through third parties also during the term of the contract, shall be processed by TIM for the following purposes relating to the performance of the contract, including pre-contractual activities: **a)** provision of electronic communication services (i.e. access to mobile, fixed line, and electronic telephone networks, transmission of communications made by you) and any other related services requested; **b)** construction and maintenance of electronic communications systems and telecommunication lines; **c)** installation, delivery and assistance of products and/or devices; **d)** billing, also on behalf of third parties, of subscription charges, traffic and of any other supplementary products/services; **e)** assistance and management of complaints and disputes; **f)** management of delayed payments or of default in payments and, if necessary, debt collection; **g)** assignment of credit to authorized companies; **h)** keeping and use of customer accounting data regarding timeliness of payments for rewarding policies; **i)** possible participation to prize competitions or to fidelity programs.

Furthermore, where you have subscribed to one of TIM’s internet services and/or a mailbox service, the data provided by you shall be processed in order to access services available in TIM’s websites/portals. These services include, inter alia, the access to: the “TIM Bill” and the traffic records relating to calls or internet connections made, the payment status, information on status of your request and/or of trouble tickets on faults, assistance, purchase of products and/or services. In particular, if you have subscribed to a ADSL or Fiber Service and you intend to use the online technical assistance service, please be advised that during the test phase on the set up of your browser, email client and modem, the following data will be detected: the software configuration of internet connection, including the related technical data of your personal computer and configuration of the hardware, data that shall be transmitted with the ticket that you will send to TIM’s Customer Care.

In order to activate and manage new or additional contracts and for the purpose of carrying out preliminary verifications and fraud prevention, TIM may acquire directly or through third parties information on your rate of reliability and timeliness in payments taken from public databases and registers (i.e. registration in the list for protested bills or subject to legal proceedings) and from credit information systems (i.e. credit/financial relationships); for the same purposes TIM may analyze its records relating to the requested contract or to contracts in progress or already expired (including those relating to payments and complaints, if any). In this context, it may be possible to process and/or acquire synthetic evaluations (“score”) on your credit rating which are based on public data and/or credit information, that will be retained by TIM for the time strictly necessary to perform the activities concerning the execution of the contract and the managing of your request to access personal data, if any. Moreover, in accordance with the current law on the public system of fraud prevention in the sector of consumer credit, with specific reference to identity theft, TIM shall communicate data to the Central Computerized Archive, established in Ministero dell’Economia e delle Finanze (controller) and managed by Consap S.p.A. and linked to databases of Agenzia delle Entrate, Ministero dell’Interno, Ministero dei Trasporti, Inps, Inail, for the purpose of verifying the authenticity of the data contained in the documents provided by customers (if deemed useful to verify their identity, in event of requested extensions or deferred payments of services), as well as for the exchange of information necessary to prevent the risk of fraud and the fight against fraud suffered by identity theft.

As well as for fraud prevention, your personal data, including traffic data, may be processed by TIM for the purposes of its legitimate interest to the extent strictly necessary and proportionate in order to ensure network and information security and to transmit personal data within Telecom Italia Group for internal administrative purposes.

In addition, your personal data, including traffic data, may be processed by TIM to exercise or defend any of its rights in court as well as to fulfill obligations under laws, regulations or EU legislation and provisions arising under statutory requirements by Authorities or by other legitimized entities (i.e. to send communications as a result of emergency measures).

Your personal data is necessary in order to achieve the above mentioned purposes; failure to provide such data or data which is incomplete or inaccurate may result in the impossibility for TIM to activate or deliver the services requested.

2) Storage of personal data, including traffic data

TIM will keep your personal data for a period no longer than is necessary for the purposes for which such data was collected or subsequently processed as well as for the period as provided by law for administrative purposes, the management of any claims or disputes or for criminal proceedings. In particular, your historical data, relating to status and timeliness in payments and to possible complaints within contracts in progress or already expired, will be retained for a period no longer than five years (5) as from the date in which the contractual relationship with TIM has expired and, anyway, until the delay in payments persists and the activities of debt collection are still ongoing.

Furthermore, telephone traffic data and/or electronic communications traffic data shall be retained for: **a)** a period no longer than six (6) months as from the date of the communication for billing and/or for claim of payments purposes, subject to additional retention as may be specifically necessary on account of a claim also lodged with judicial authorities; **b)** the period specified in the possible contracts you signed for the purpose of the provision of value added services and for marketing electronic communications services; **c)** seventy-two (72) months as from the date of the communication for criminal purposes.

3) Additional purposes for personal data processing with the Customer’s prior consent

In the event you have given your consent upon activation of the service requested or at a later stage, your personal data, including traffic data, may be processed by TIM, by automated means of contact (such as sms, mms, fax, calling systems, email and web applications) and traditional ones (such as calls by human operator), for the purposes of sending advertising materials, direct marketing, carrying out of market researches and business communication, with regard to the offer of TIM’s products and services. Other than as just indicated, the postal address you have given us during the purchase of our product or service can instead be processed by TIM, unless your objection in the way specified in point **9)** below, for the above mentioned marketing purposes, relating to our products or services similar to those you have purchased.

Moreover, in event you have given your consent, your individual and detailed personal data (including traffic data and internet browsing data) may be processed by TIM for profiling activities to identify, also by automated processing, your specific behaviours and consumption habits in order to improve services supplied, meet your needs and address the commercial proposals of interest. It remains still the possibility for TIM to process such data in aggregate form in compliance with the measures provided by Italian Data Protection Authority and under the specific exemption from

the consent provided by the same Authority, for analysis and electronic processing (i.e. classification of customer base in homogeneous categories for levels of services, consumption, expenditure, etc..) in order to periodically monitor the development and the economic trend of activities of TIM, orient its industrial and business processes, improve services and pricing plans, design and perform the marketing communication campaigns. Furthermore, upon prior anonymization, the aforesaid data may be processed with the sole purpose of producing statistical analysis, without any direct effect on individual customers

4) Additional purposes for data processing with the Customer's prior consent for receiving third party advertising from TIM

In event you have given your additional and specific consent upon activation of the service requested or at a later stage, your personal data, including traffic data, may be processed by TIM to communicate and/or send, by automatic means of contact (such as sms, mms, fax, calling systems, email and web applications) and traditional ones (such as calls by human operator), third party advertising material and commercial information.

5) Withdrawal of consent

The providing of your personal data and your consent to use it for purposes referred to previous points **3)** and **4)** is not compulsory, but it can help us to improve our products and services and communicate any updates of your interest to you. Anyway you may verify and withdraw your consent for such purposes at any time by contacting free-of-charge the phone numbers 191 or 800.191.101. Moreover, you have the right to object in part to the processing of your personal data for the marketing purposes (by automated or traditional means of contact). Following your refusal or withdrawal of such consent, TIM shall process your personal data strictly for the purposes described previously in point **1)**.

6) Procedures and logic applied to data processing

The processing of personal data shall be carried out manually and/or by electronic or automated means, on the basis of logic of organization and processing of your data, including traffic data, relating to the purposes described above, and in any event, in order to ensure the security and the confidentiality of the data and of the communications. In particular, data shall be processed by automated procedures: (i) to identify, upon receiving the call to TIM customer service, the category of customer and the related contract and the device used, in order to allow the operator to respond effectively to requests; (ii) to profile customer who have given consent to address the commercial proposals of interest; (iii) to make a decision about the provision or not of the products/services requested and the management of delayed payments or of default in payments.

7) Controller, Data Protection Officer and Persons authorized to process personal data in TIM

The Controller of your personal data is TIM S.p.A., with registered offices in via Gaetano Negri, n. 1 - 20123 Milan. TIM has appointed a Data Protection Officer for the Telecom Italia Group, domiciled in TIM, via Gaetano Negri n. 1 - 20123 Milan, and who may be contacted by sending an email to the following address: dpo.clientibusiness.tim@telecomitalia.it. The updated list of contact details of the Data Protection Officer may be consulted by clicking on the "Privacy" link on the www.telecomitalia.com website.

Your personal data shall be processed by employees of the following departments: Customer Care, Sales, Marketing, Billing, Fraud Prevention, Network and Information Technology. Employees are authorized to process personal data and have received adequate operating instructions in such regard.

8) Categories of third parties to whom personal data may be communicated as Controllers or who may acquire such data as Processors

In addition to TIM employees, your personal data may be processed by third parties, including the Companies of the Telecom Italia Group, to whom TIM assigns certain activities (or parts of them) for the purposes referred to in point **1)** above and, in the event that you have given the consent, for additional purposes referred to in points **3)** and **4)**. Such third parties may also be established abroad, in EU and non EU countries; in this latter case, the data transfer is carried out on the basis of a decision by the European Commission regarding the adequacy of the level of data protection of non EU countries or on the basis of appropriate and suitable safeguards as provided by articles 46 or 47 of the GDPR (i.e. signing of standard data protection clauses adopted by the European Commission) or other conditions for the lawfulness of the transfer as provided by article 49 of the GDPR. Such third parties either act as independent Controllers or will be appointed as Processors and they are mainly included in the following categories: **a)** entities to whom TIM assigns the construction and maintenance of electronic communications systems and telecommunication lines and/or the delivery, installation and assistance of products or devices; **b)** entities (i.e. call centers) to whom TIM assigns the activities of assistance, advertising, promotion and sale to customers; **c)** entities to whom TIM communicates Fiscal Code Numbers/VAT Registration Numbers in order to verify the accuracy and validity of customer data; **d)** debt collection agencies and companies operating in the field of fraud prevention and that provide for credit, economic and commercial information services, including those that manage information systems for verifying reliability and timeliness in payments; **e)** companies that process traffic data for billing purposes; **f)** companies in charge of printing and sending of invoices and/or other documentation to customers; **g)** other electronic communications operators providing non geographical numbers, on behalf of whom TIM carries out billing services and, in some cases, the related debt collection activities; **h)** consultancy firms; **i)** credit assignee companies; **j)** agents, brokers and dealers; **k)** companies that carry out market researches and surveys; **l)** Authorities (i.e. AGCom, AGCM, Garante privacy), Ministero dell'Economia e delle Finanze and any other public entity authorized to request data.

9) Right of access to personal data and other rights

You have the right to access personal data relating to you at any time and to exercise the other rights provided for by data protection laws (to request the source of your personal data, the rectification of inaccurate and incomplete data, the restriction of processing, the erasure or the right to be forgotten, data portability as well as to object to the processing of your personal data on legitimate grounds or to withdraw consent for the purposes referred to previously in points **3)** and **4)**), by writing to the Customer Care Department as specified in TIM telephone bill or by contacting free-of-charge the phone numbers 191 or 800.191.101. Finally you have the right to lodge a complaint with the Italian Data Protection Authority

TIM S.p.A.