Information pursuant to the data protection legislation - Business and Enterprise Customer

Dear Customer,

pursuant to Articles 13 and 14 of Regulation 2016/679/UE (General Data Protection Regulation – hereinafter as "GDPR"), Telecom Italia S.p.A., hereinafter as "TIM", hereby provides you with the Information regarding the processing of your personal data and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Group.

1) Categories of personal data processed

a) Data relating to the Customer (company, public entity o association), such as: name, tax code/VAT Registration Number; contact details (telephone numbers, postal address, e-mail address); data on activity carried out; data relating to products sold and services activated; data of payment instruments (e.g. IBAN); billing and payment status data; telephone and telematic traffic data ("traffic data"); data relating to the connection (e.g. IP address) and internet browsing; profiling data; data relating to products, devices, PCs and services used (e.g. brand and model, configurations and connection methods, browser and email client, other technical data); data relating to contacts with TIM, including interactions via digital customer service channels (e.g. chatbots/virtual assistants available on TIM apps and web portals, instant messaging systems on social media platforms and/or WhatsApp).

b) Common data, as referred to in art. 4, point 1, n. 1, of the GDPR, relating to the Legal Representative, of the authorized Contact Person of the Customer and end users, such as: personal details (name, surname, gender, date and place of birth, tax code); contact details (wireline and/or mobile telephone number, postal address, e-mail address); access and identification data (e.g. username, password) and logs of accesses and activities carried out on company websites/portals and apps; payment instruments details (IBAN, credit card details, PayPal, Satispay etc.); billing and payment status data (if the current contract provides for the invoicing and payment, at least in part, of fees by the end user); traffic data (generated for the transmission of communications and related billing, such as, for example, calling/called numbers, IP addresses, type, date and time of communications, and cell-ID identifiers of the device from which communications are made); data relating to the connection (e.g. IP address) and internet browsing; location data (derived from technical data originating from the mobile telephone network, such as the geographical locations of radio cells);, data relating to identification documents.

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

2.1) Processing relating to the performance of a contract

The abovementioned data, provided by you and/or obtained from third parties also during the course of the contractual relationship, shall be processed by TIM for the following purposes relating to the performance of the contract, including the pre-contractual activities: **a)** the Customer identification and provision of electronic communication services (i.e. access to fixed-line, mobile and electronic telephone networks, transmission of your communications) and any other service requested; **b)** the construction and technical maintenance, even remotely, to ensure the highest level of quality, of electronic communications systems and connections; **c)** the installation, delivery and maintenance of products, devices and/or equipment; **d)** billing, also on behalf of third parties, of subscription charges, traffic and of any other additional products/services; **e)** management of collections and of delayed or missed payments; **f)** commercial, administrative and technical assistance, including via digital channels, and management of complaints and disputes; **g)** management of data published in telephone directories; **h)** sending service communications; **i)** measuring customer satisfaction (surveys, an optional activity for the Customer); **l)** payment of fees through a loan provided by a company specialized in consumer credit; **m)** storage and use of data relating to contractual proposals and concluded contracts, including data regarding timeliness of payments for rewarding policies and for the remuneration of sales channels; **n)** access to the services offered on TIM's websites/portals and apps; **o)** participation to prize competitions or to loyalty programs; **p)** the exchange of data with TIM Group companies or with other partners for the activation and management of combined or bundled offers, as well as for the application of any discounts.

Institutional or service-related communications sent by email, such as those sent following a request to activate certain services, may contain tracking pixels (tiny, transparent images that are virtually invisible, inserted into emails to detect when they are opened by recipients), which TIM will use to confirm whether the message has been received by the individual customer, including for the purpose of sending reminder messages. This processing is based on the performance of the contract between you and TIM (Article 6(1)(b) of the GDPR), as also recognised by the Data Protection Authority's Guidelines on the use of tracking pixels in email communications (Decision No. 284 of 17 April 2026). Furthermore, tracking pixels may be used to enable anonymous statistical analysis (for example, to determine the percentage of recipients who have opened a specific type of communication), which is also useful for verifying that emails have been received correctly. The actual presence of the tracking pixel and the purpose for which it is used will be indicated in the message displayed in the email footer.

2.2) Processing based on legitimate interests

Your personal data and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Groupmay be processed in pursuit of the legitimate interests of TIM or third parties to the extent strictly necessary and proportionate for the following purposes:

a) to prevent delinquency and frauds, during the activation and management of new or additional contracts, through: **i)** the collection, either directly or through third parties, of information on your creditworthiness and payment history from public databases and registers (e.g. registration in the list for protested bills or subject to legal proceedings) and from credit information systems (SIC) (e.g. loan agreements) and the consultation of internal records (including those relating to payments and any complaints) already held in relation to the contract to be entered into or to any contracts currently in force or previously terminated with our company ; in this context, summary results or assessments ("*scores*") on your credit rating may be processed and/or obtained based on the findings of public data and/or credit information and/or internal records; **ii)** the verification of the validity of the IBAN and of the correct association with the Tax Code of the current bank account holder provided for the direct debit, by communicating this information to the company Experian Italia S.p.A. and to the bank where the current account is held, through the companies Nexi Payments S.p.A. and CBI S.C.p.A. via the "Check-Iban CBI Globe" interbank service (the privacy notice on the "Check IBAN" service is available at: www.nexi.it/privacy.html); **iii)** the consultation of the inter-Operator database on intentionally non-payment (delinquency) by customers in the telecommunications sector (S.I.Mo.I.Tel.), managed as an independent data controller by the company CRIF S.p.A., and the communication to this database of the personal data of its own delinquent customer only where all the requirements set forth in the Decision n. 523 of 8 October 2015 of the Italian Data Protection Authority are met; **iv)** the consultation of the inter-Operator information system for the prevention of identity fraud (SIFRID), managed as an independent Controller by the company Experian Italia S.p.A. (whose privacy policy is available at https://www.experian.it/consumatori) and the communication to this system of the data provided by the customer at the time of the request for activation of a telephone line or the purchase of a product on deferred payments terms, in order to detect inconsistencies regarding the customer's identity; **v)** the communication, in accordance with the current legislation governing the public system for fraud prevention in the consumer credit sector, with specific reference to identity theft, of data to the Central Computerized Register (SCIPAFI), established at the Ministry of Economy and

Finance (data controller) and managed by the company Consap S.p.A. and linked to the databases of the Revenue Agency, the Ministry of Internal Affairs, the Ministry of Infrastructures and Transport, public entities (Inps, Inail), for the purpose of verifying the authenticity of the data contained in the documents provided by customers (if deemed necessary to ascertain their identity, in event of a request for payment extensions or deferrals for services), as well as for the exchange of information necessary to prevent the risk of fraud and to combat fraud resulting from identity theft; **vi)** the verification of the consistency and authenticity of the identity documents provided by customers for whom there is a risk of identity fraud (based on the results of previous checks), communicating a copy thereof, together with the customers' personal details as provided in the application for new services, via the PreventGo service of Namirial S.p.A.;

b) to detect and counter, whilst the services are being used, any behaviour that is anomalous, does not comply with the contractual terms of the service, or is malicious (e.g. abuses, frauds);

c) to carry out debt recovery activities (e.g. payment reminders, assigning cases to debt collection agencies or external lawyers, and the related accounting management of customers' outstanding debts), as well as to carry out operations relating to any assignment of the debt;

d) to disclose, upon request, to third parties (e.g. banks and financial intermediaries, securities brokerage firms, other service providers), acting as independent data controllers, some of your personal data (including personal details and your mobile or fixed number) that you have already provided to such parties (please refer to their privacy policys) in order to use or subscribe to their services, for the purposes of fraud prevention (e.g. the so-called 'Sim Swap Fraud') and/or to verify your identity when accessing online services via authentication systems that use your mobile or fixed number (e.g. to carry out online transactions such as online banking and to access databases);

e) to use the postal address you have given us when purchasing our products or services, in accordance with the simplification measures set out by the Italian Data Protection Authority and until you object for marketing purposes, namely the sending of advertising material, direct sales, the carrying out of market research and commercial communications relating to the provision of TIM products and services similar to those you have purchased;

f) to carry out customer profiling activities in aggregate form, in compliance with the measures prescribed by the Italian Data Protection Authority and under the specific exemption from the requirement for consent on the basis of TIM's legitimate interest, as provided by that Authority and / or by the data protection impact assessments that TIM has carried out in advance. Specifically, such data processing in aggregate form is carried out for the purpose of conducting analysis and electronic processing (e.g. classification of entire customer base in homogeneous categories based on service levels, usage, potential needs, service satisfaction, etc..) in order to periodically monitor the development and the economic performance of TIM's activities, guide its industrial and business processes, improve services and tariffs plans, design and implement marketing communication campaigns through targeted and higher-quality offers. Furthermore, upon prior anonymization, the aforementioned data may be processed for the sole purpose of producing statistical analysis, without any direct effect on individual customers;

g) to carry out, via the system called Speech Recording & Analytics (full details of which can be found under the 'Privacy' section of the website www.gruppotim.it), statistical analysis of a sample of transcripts of anonymised voice conversations between customers and TIM Customer Care Service operators, in order to verify and improve the quality of the Customer Care service and to deepen the knowledge of customers' needs;

h) to generate statistical information on the presence and mobility of the population in relation to a specific location or area as part of services provided to public and private entities, by processing traffic and location data originating from TIM's mobile network in an aggregated and anonymous form, subject to pseudonymisation and encryption techniques;

i) to process personal data (including traffic and location data) in an anonymous and aggregated form for the purpose of producing anonymous and statistical information, to be used and/or provided to third parties, including public authorities, in the context of specific projects undertaken by such third parties, including those in the public interest (e.g. relating to national security, civil protection and other emergencies);

j) to carry out statistical analyses and develop predictive models based on customers' personal data, which has been aggregated and previously subjected to pseudonymisation or encryption techniques that that prevent identification of individual persons, by comparing it with the customer base of other companies (for the purpose of determining the number and percentage of common records without knowing which individuals are involved), in order to identify business opportunities and synergies arising from the characteristics of the respective customer bases;

k) to ensure the improvement of the quality of the network and services and the proper functioning of the company's websites/portals and apps;

l) to ensure the security of network and information systems;

m) to transmit data within Telecom Italia Group for internal administrative purposes;

n) to ensure the establishment, exercise or defense of any own rights in civil, administrative or criminal proceedings.

You are entitled to object, at any time, to the processing of your personal data for the purposes set out in this Section ***2.2)*** in the manner set out in Section ***9)*** below; TIM shall no longer process your personal data, unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of a legal claim.

2.3) Processing for compliance with a legal obligation

Your personal data and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Group may be processed by TIM in order to fulfill obligations under laws, regulations or EU legislation and provisions issued by Authorities or by other institutional entities (e.g. to send communications following emergency measures).

The provision of personal data is necessary to achieve the purposes set out in this Section ***2)***; failure to provide such data or the provision of incomplete or inaccurate data may result in the impossibility for TIM to provide the services requested.

3) Purposes for which data processing is optional with consent

3.1) Processing for marketing purposes relating to TIM products and services

In the event you have given the specific consent for this purpose at the time the service was activated or subsequently , TIM may process your personal data, as referred to in Section ***1)*** above, including traffic data, and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Group, using automated means of contact (such as sms, mms, fax, calling systems, email, instant messaging systems and web applications) and traditional methods (such as calls handled by human operator), for marketing purposes, namely the sending of advertising materials, direct sales, the carrying out of market researches and commercial communication, in relation to the provision of TIM products and services, as well as, pursuant to Article 123, paragraphs 3 and 4, of Legislative Decree 196/2003 (Privacy Code), with regard to the marketing of specific TIM services available in certain areas where the data

subject's device is located (e.g., in the case of mass gatherings or events), identified in near real time on the basis of traffic data generated by the data subject (such as the identification of the radio cell to which the device from which communications are made is registered). However, this does not affect TIM's right to: **a)** process aforementioned data without your consent in accordance with the Section ***2.2)***, letter **e)** above; **b)** contact you following your specific request for information about TIM products and services.

Commercial communications sent by email may contain tracking pixels, which TIM will use to measure whether each customer has opened the email, in order to evaluate and improve its promotional campaigns. The presence of a tracking pixel will be indicated in the message footer of the email.

For the same purposes and by the same means of contact, whenever you have given further specific consent, TIM may contact the Legal Representative and/or the authorized Contact Person of the Customer on the mobile number which is active with another Operator of which he has declared himself to be the holder or exclusive user and that he provided as his contact detail when the contract was signed or during the term of the contract.

3.2) Processing for individual profiling purposes

In the event you have given the specific consent for this purpose at the time the service was activated or subsequently, your individual and detailed personal data and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Group (including data relating to how the service is used and accessed and the devices used, as well as the traffic data and the internet browsing data) may be processed by TIM for profiling activities in order to identify, also using automated processing, your specific behaviours and consumption habits for the purposes to improve the services provided, also in terms of quality, and, if you have given your specific consent (see Sections ***3.1*** and ***3.3***), to meet your needs and address the commercial proposals of interest. However, this does not affect TIM's right to process such data in aggregate form without consent in accordance with the Section ***2.2)***, letter **f)** above.

3.3) Processing for advertising purposes of third parties

In event you have given the specific consent for this purpose at the time the service was activated or subsequently, TIM may process your personal data and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Group to communicate and/or send, using automated means of contact (such as SMS, MMS, fax, calling systems, email, instant messaging systems and web applications) and traditional methods (such as telephone calls handled by human operator and paper mail), advertising material and commercial information of third parties.

For the same purposes and by the same means of contact, whenever you have given further specific consent, TIM may contact the Legal Representative and/or the authorized Contact Person of the Customer on the mobile number which is active with another Operator of which he has declared himself to be the holder or exclusive user and that he provided as a contact detail when the contract was signed or during the term of the contract.

3.4) Disclosure of personal data to third parties for their own marketing purposes

TIM may disclose your unique online identifier, generated on the basis of the IP address you are using to browse the internet , and your mobile telephone number, previously subjected to pseudonymisation techniques, to the company Utiq SA/NV (hereinafter as "Utiq"), provided that you have activated the digital customized advertising service provided by Utiq, by giving Utiq your specific consent to the activation of Utiq's technology on digital properties (such as websites or apps) that make use of it, when you use an internet connection. You can manage this consent at any time and consult the privacy policy provided by Utiq, as an independent data controller, and find any other useful information about the exercise of privacy rights, Utiq's technology and parties (publishers and advertisers) Utiq collaborates with on the Utiq's privacy portal (https://consenthub.utiq.com/) or by clicking on the "Manage Utiq" link available at the footer of the websites of the aforementioned parties.

4) Withdrawal of consent

Providing your personal data and giving your consent to use it for purposes referred to in Section ***3)*** above is optional, but may help us to improve our products and services and to inform you of updates that may be of your interest. Anyway, you may check and withdraw any consent given for such purposes at any time by accessing the company's portals dedicated to customers, by contacting free-of-charge the phone numbers 191, 800.191.101 or 800.134.134 (for customers of Public Phone). Moreover, you have the right to object in part to the processing of your data for marketing purposes (via automated or traditional means of contact); in particular, you may withdraw the consent referred to in Section **3.1*)*** above, specifically regarding the receipt of commercial communications sent by email (DEM) and the use of tracking pixels in emails, by clicking on the relevant link at the footer of those emails. Following your refusal or withdrawal of such consents, TIM shall process your personal data and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Group solely for the purposes described in Section ***2)*** above.

5) Retention of personal data, including traffic data

TIM will retain the 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, for the management of any complaints, disputes or criminal proceedings. In particular: **a)** profiling data will be retained for fifteen (15) months; **b)** the results or summary assessments ("*scores*") on your credit rating acquired or processed during the activation and management of new or additional contracts will be retained for the time necessary to carry out the activities relating to the performance of the contract and the management of any requests you may make for access to personal data; **c)** data on status and timeliness of payments and on any complaints relating to current or terminated contracts will be retained for five (5) years from the date of any termination of the contractual relationship with TIM and, in any event, until the delay in payments persists and the activities of debt collection are ongoing.

Furthermore, if you have given your consent for marketing purposes (as described in more detail in Section ***3.1)*** above) and have not withdrawn it as provided for in the Section ***4)*** above, TIM may contact you for up to five (5) years following the termination of the contractual relationship to offer you TIM services, without prejudice to the provisions set out in the second part of Section ***3.1)*** above regarding the possibility, pursuant to the aforementioned Article 123 of the Privacy Code, of retaining certain traffic data (Cell-ID) only for the time necessary to carry out each marketing campaign relating to specific TIM services available in certain areas.

Finally, telephone and telematic traffic data shall be retained as from the date of communication for**: a)** a period no longer than six (6) months for billing and/or payment collection purposes, subject to additional retention required as a result of a dispute, including in court proceedings; **b)** the period specified in any contracts you may have entered into for the provision of value-added services and for the marketing of electronic communications services; **c)** seventy-two (72) months for criminal investigation purposes.

6) Procedures and logic applied to data processing

Data processing will be carried out manually and/or by electronic or automated procedures, on the basis of data organization and processing logics relating to the purposes described above and, in any event, in such a way that ensures the security and the confidentiality of the data and of the communications. In particular, data will be processed using automated procedures, which may make use of Artificial intelligence (e.g. chatbots and virtual conversational agents), machine learning techniques and big data analytics, in order to: **a)** identify, at the time of a call to TIM customer service, the category of customer and the related contract and the device used, to enable the operator to respond effectively to requests; **b)** profile customers who have given their consent to target them with commercial offers t; **c)** carry out aggregated analysis and profiling of the customer base; **d)** support operators' decision-making regarding whether or not to supply the requested products/services, also for the purposes of preventing delayed payments and frauds; **e)** carry out certain activities relating to the sales process (e.g. collecting data from customers' identification documents), after-sales services (e.g. when issuing orders) and customer support (e.g. handling certain enquiries made by customers to the TIM Customer Service department, including via digital channels, and providing support to staff) or marketing (e.g. optimising commercial campaigns). Finally, personal data may be subject to encryption/pseudonymisation, aggregation or anonymisation for the purposes set out in Sections ***2.2)***, letters **f)**, **g**), **h**), **i)** and **j**) of section ***2.2)*** above.

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

The Controller of your personal data and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Group is TIM S.p.A., with registered offices in via Gaetano Negri, n. 1 - 20123 Milan. TIM has appointed a Data Protection Officer, who can be contacted by writing to the following address of TIM: via Gaetano Negri n. 1 - 20123 Milan; or by sending an email to: *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.gruppotim. website.

Your personal data shall be processed by TIM employees that have been appointed persons 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 or who may acquire such data***

Your personal data and, and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Group may also be processed by third parties, including TIM Group Companies, to whom TIM assigns certain activities (or part thereof) for the purposes referred to in Section ***2)*** and, if you have given the consent, for additional purposes referred to in Section ***3)*** above**.** 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 (e.g. 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 data controllers or will be appointed as data processors and they are mainly included in the following categories: **a)** entities to whom TIM assigns the construction, installation and maintenance of electronic communications systems, connections (telecommunication lines) and equipment/devices; **b)** technical/IT services providers; **c)** entities to whom TIM assigns the activities of assistance, advertising, promotion and sale to customers (e.g. call centers, agents, brokers, dealers and other commercial partners); **d)** Providers of social media and messaging platforms, through which customer support is provided via certain digital channel; **e)** Media centres, advertising agencies and event organizers; **f)** Publishers, broadcasting companies and companies providing entertainment services; **g)** entities to whom TIM communicates Tax Code/VAT Registration Number and IBAN in order to verify the accuracy and validity of customer data; **h)** debt collection agencies and credit assignee companies; **i)** companies operating in the field of delinquency and 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, as well as the "Administrator" of database S.I.Mo.I.Tel. and of the database SIFRID; **l)** companies in charge of printing and sending of invoices and/or other documentation to customers; **m)** Logistics and delivery service providers; **n)** banks, financial intermediaries and companies specialized in consumer credit for the provision of loans; **o)** 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; **p)** consultant and law firms; **q)** companies that carry out market researches and surveys; **r)** Authorities (e.g. AGCom, AGCM, Garante privacy – the Italian DPA), Agenzia delle Entrate (the Income Revenue Authority), Judicial Authority, and Judicial Police, Ministry of Economy and Finance and any other public entity authorized to request data.

9) Customer's rights

With regard to the processing of your personal data and, should you be acting under a specific mandate to represent the companies of your Group in their name and on their behalf, the personal data of the companies of your Group, you are entitled toto exercise at any time the rights provided for in Articles from 15 to 22 of the GDPR (to access personal data, to request the source of data, the rectification of inaccurate and/or incomplete data, the restriction of processing, the erasure or the right to be forgotten, the data portability as well as to object to the processing of data on legitimate grounds or to withdraw consent for the purposes referred to in Section ***4)*** above), by writing to the Customer Care Department as specified in TIM telephone bill or by contacting free-of-charge the phone numbers 191, 800.191.101 or 800.134.134 (for customers of Public Phone). Moreover, the always updated text of this Privacy Policy is available in the "Privacy" link of the www.gruppotim.it website.

Finally, you have the right to lodge a complaint with the Italian Data Protection Authority (art. 77 of the GDPR) or, alternatively, to appeal to the competent judicial authority (art. 79 of the GDPR), if you believe that the processing of personal data relating to you infringes the legislation in force.

TIM S.p.A.