



TIM PRIVACY POLICY KEY ASPECTS

DECEMBER 2020

Key aspects regarding TIM Privacy Policy (Data protection and privacy policy)

TIM Group is fully compliant with data protection law by referring to European legislation, in particular the regulatory references are: General Data Protection Regulation (GDPR), Eprivacy Regulation - European legislation on electronic communications services-, Privacy Code 2018 (D.Lgs 196/2003 - D.lgs 101/2018) and Measure of the Protection Authority.

In addition, after establishing its own privacy policy alongside with the internal rules and guideline for customer data protection, the Group is rigorously complying with all of them.

The Policy is applicable to all:

- internal executives/employees,
- external stakeholders.

| Category | Description |
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| <p><i>Privacy policy systems and procedures</i></p> | <p>TIM Group has internal policies for data protection: data protection policy and customer data protection policy. Respecting privacy regulations is a priority for TIM, which has had a structured organisational model in place which is capable of overseeing the correct application of this legislation at Group level. Company departments are committed to ensuring the correct processing of personal data of data subjects, including customers and employees, in carrying out business activities.</p> <p>Data protection policy and customer data protection policy define administrative/technical measures for data protection, duties and responsibilities of executives/employees and relevant personnel for data protection, data protection level diagnosis, response to data leaks and other breaches. Data protection policy is applied not only to internal executives/employees but also to all other stakeholders directly/indirectly related to TIM.</p> <p>In particular, the "Rules system for the application of the law on the protection of personal data in the TIM Group" (Rules system), is very significant, which defines the operational guidelines for each performance of interest. These documents are available in TIM intranet, section privacy.</p> <p>In 2019 and 2020, the rules system was updated with reference to the Legislative Decree 101/2018 of adaptation of the Privacy Code to the GDPR, and to the provisions of the Privacy Authority in the last two years.</p> |
| <p><i>Responsibilities and accountabilities</i></p> | <p>TIM Group clearly defines the scope of authority/responsibility of its employees/stakeholders with regard to data protection and customer privacy data protection. In May 2018, the <i>data protection department</i> was established at TIM Group level, dealing with control, consultation, training and information regarding the application of privacy legislation. The adoption of legal measures and the instructions of the Italian Data Protection Authority for personal data protection is assured by constantly updating the Group regulations and policies.</p> |
| <p><i>Group wide risk management</i></p> | <p>TIM Group is in full compliance with TIM Group's customer privacy data policy & guideline and security guideline, and has designed/introduced its own policy & guideline based on the Group's security/customer data policy & guideline after adjusting them to fit its own business scope and environment.</p> |

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| <p><i>Main changes introduced by the GDPR</i></p> | <p>From 25 May 2018, Regulation (EU) concerning the protection of individuals with regard to the processing of personal data (“General Data Protection Regulation” or GDPR), includes various updates on the previous legislation on the matter, among these: 1) the level of significance of the obligations in relation to the privacy and accountability risk of entities that process data (e.g. provisions on the privacy impact assessment, documentation of processing, security and data breach measures, and the introduction of the role of Data Protection Officer); 2) strengthening rights exercisable by individuals (e.g. customers, employees), such as the new rights to be forgotten and to personal data portability; 3) economic significance of the sanctions applicable in case of violation.</p> |
| <p><i>Disciplinary actions</i></p> | <p>In general, TIM Group for these issues, depending on the type of event and the level of responsibility, applies to its employees graduated sanctions based on the severity of the behaviour adopted (i.e. suspension/termination of employment and licence store terminated immediately).</p> |
| <p><i>Audit of privacy protection compliance</i></p> | <p>The effective application of the internal policies is monitored through an extensive control system based on regular self-assessment procedures, sample checks carried out by the relevant central and regional departments, based on established procedures and methods, as well as for planned and identified second level controls, also due to the inherent risk level of processing. Also during the course of 2019, TIM continued to take the steps required to ensure the implementation of provisions in its internal processes to deal with any violation of personal data security (data breaches), as well as to respond to the numerous customer requests (for example, to know what personal data is being processed by TIM or exercise other rights) and the information requests submitted to TIM by the Italian Data Protection Authority.</p> |