

Information to Consumer Customer provided by TIM pursuant to the laws regarding the protection of Personal Data

Dear Customer,

in pursuance to Articles 13 and 14 of Regulation 2016/679/UE (General Data Protection Regulation – hereinafter as “GDPR”), TIM S.p.A., hereinafter as “TIM”, herewith provides you with the information regarding the processing of your personal data.

1) Categories of personal data

TIM acquires and processes your personal data such as:

a) common data referred to in art. 4, point 1, GDPR: general personal information (name, surname, sex, date and place of birth, fiscal code); contact details (wireline and/or mobile phone number, postal address, e-mail address), access and identification data (e.g. username, password); data relating to products sold and services activated, billing information; payment data (IBAN, credit card details, etc.), data on the status and timeliness of payments, telephone and telematic traffic data, data relating to the connection (e.g. IP address) and internet browsing, profiling data, location data (e.g. Cell-id), data relating to identification documents, data relating to products, devices and PCs used (e.g. brand and model) and technical data; data relating to contacts made with TIM;

b) special categories of personal data referred to in art. 9 of the GDPR: data concerning health, necessary exclusively to recognize the right to benefit from offers at favorable conditions.

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

Your personal 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 service requested; **b)** construction and technical maintenance, even remotely, to ensure the highest level of quality, 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)** customer satisfaction survey; **g)** management of delayed or default in payments and debt collection; **h)** assignment of credit to authorized companies; **i)** payment of fees through a loan provided by a company specialized in consumer credit; **l)** keeping and use of customer accounting data regarding timeliness of payments for rewarding policies; **m)** possible participation to prize competitions or to fidelity programs.

Furthermore, the processing of the particular categories of personal data, referred to in point **1b)** above, requires your explicit consent in order to be able to benefit from offers at favorable conditions, pursuant to current legislation.

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 status or the execution of payments, 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 or telephone technical assistance service, please be advised that for the execution of controls on the correct functionality of the line and modem, the data about its set-up, connection methods and related connected devices will be detected; the technical data of your personal computer, browser, email client and the related configuration, will be transmitted with the ticket that you will send to TIM's Customer Care.

For its own legitimate interest in order to prevent delayed or default in payments and frauds, in the activation and management of new or additional contracts, TIM may: **i)** acquire directly or by 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 internal 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 and/or internal records, 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; **ii)** acquire, for purchases made on digital channels, information relating to the email address, the device used and the methods of data entry, processed for TIM by Experian Italia S.p.A. for the definition of a risk score useful for preventing fraudulent phenomena to the detriment of the customer; **iii)** verify the validity of the IBAN and the correct association with the fiscal code of the holder of the bank account provided for the direct debit, communicating this data to Experian Italia S.p.A. and to the bank where the current account is opened, through Nexi Payments S.p.A. and CBI S.C.p.A. via the interbank service “Check-Iban CBI Globe” (the privacy notice on the “Check IBAN” service is available at: www.nexi.it/privacy.html); **iv)** consult the inter-operator database containing telephone company customers who are intentionally delinquent (S.I.Mo.I.Tel.), as well as to communicate in this database the personal data of its own delinquent customer only when such an action meets all the requirements set forth in the Decision n. 523 issued by Italian Data Protection Authority on October 8, 2015. Finally, 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 the Ministry of Economy and Finance (controller) and managed by Consap S.p.A. and linked to 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 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 through identity theft.

Your personal data may be also processed by TIM for the purposes of its legitimate interest to the extent strictly necessary and proportionate in order to ensure network and information systems security, to transmit personal data within Telecom Italia Group for internal administrative purposes and to detect and face behaviors non-compliant with the contractual conditions of the service or malicious behaviors (e.g. fraud): in this regard, TIM may communicate, upon request, to the bank where the current account is opened the data relating to your mobile number to prevent the illicit replacement of the SIM to access the customer's home banking (so-called “Sim Swap Fraud”).

Your personal 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 issued by Authorities or by other legitimized entities (e.g. 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.

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

In the event you have given the specific consent upon activation of the service requested or at a later stage, your personal 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 without consent, unless your objection in the way specified in point **10)** 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 the specific consent, your individual and detailed personal data (including the methods of use and access to the service, the devices used, the 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, also from the point of view of quality, 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 on the basis of a legitimate interest of TIM provided by the same Authority and / or on the data protection impact assessments that TIM has previously carried out. Such data processing in aggregate form are performed in order to carry out analysis and electronic processing (e.g. classification of customer base in homogeneous categories for levels of services, consumption, possible needs, service satisfaction, 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 through targeted and qualitatively more satisfying offers. 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. For details on the right to object to the processing, see point **10)** below.

In event you have given the specific consent, TIM may communicate your personal data to the Companies of the TIM Group and to Company Subsidiaries the updated list of the Companies of the TIM Group and of Company Subsidiaries can be consulted by clicking on the "Privacy" link of the www.gruppotim.it website) that will process your personal data as independent Controller for their own marketing purposes, 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), up to your possible objection expressed to each of the Companies of the Telecom Italia Group and of Company Subsidiaries.

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

In event you have given the specific consent upon activation of the service requested or at a later stage, your personal 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 accessing the company portal dedicated to customers, by contacting free-of-charge the phone numbers 187 (for fixed line consumer customers), 119 (for mobile consumer customers), 80.33.80 (for "Pay" and "Free" customers that have subscribed to "Tin.it" Internet access services), or by writing to the Customer Care Department as specified in TIM telephone bill or by sending an email to the address richiestaprivacy@telecomitalia.it. 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 **2)**.

6) 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, profiling data will be stored for 15 months, while your historical data, relating to status and timeliness in payments and to possible complaints referred to contracts in progress or already expired, will be stored for five years 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 and telematic traffic data shall be stored as from the date of communication 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.

7) 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 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 in order to: **i)** 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)** profile customer who have given consent to address the commercial proposals of interest; **iii)** take a decision about the provision or not of the products/services requested, in order to prevent delayed or default in payments and frauds.

8) 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, who can be contacted by writing to the following address: via Gaetano Negri n. 1 - 20123 Milan; or by sending an email to: dpo.clienticonsumer.tim@telecomitalia.it. The updated list of contact details of the Data Protection Officer may be consulted by clicking on the "Privacy" link of the www.gruppotim.it 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.

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

Your personal data may also be processed by third parties, including the Companies of the TIM Group, to whom TIM assigns certain activities (or parts of them) for the purposes referred to in point **2)** 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 (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 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 and/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 / VAT Registration Number and IBAN in order to verify the accuracy and validity of customer data; **d)** debt collection agencies and credit assignee companies; **e)** 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, as well as the “Administrator” of database S.I.Mo.I.Tel.; **f)** companies that process traffic data for billing purposes; **g)** companies in charge of printing and sending of invoices and/or other documentation to customers; **h)** banks and companies specialized in consumer credit for the provision of loans; **i)** 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; **l)** consultancy firms; **m)** agents, brokers and dealers; **n)** companies that carry out market researches and surveys; **o)** Authorities (e.g. AGCom, AGCM, Garante privacy – the Italian DPA), Agenzia delle Entrate (the Income Revenue Authority), Judicial Authority, Ministry of Economy and Finance and any other public entity authorized to request data.

10) 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 in Articles 15 to 22 of GDPR (e.g. 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 sending an email to the address richiestaprivacy@telecomitalia.it or by contacting free-of-charge the phone numbers 187 (for fixed line consumer customers), 119 (for mobile consumer customers) and 80.33.80 (for “Pay” and “Free” customers, who have subscribed to “Tin.it” internet services). Moreover, the always updated text of this Information 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

TIM S.p.A.