

Annex A2 - Information from Telecom Italia Sparkle to Customers pursuant to the legislation on the protection of personal data

Dear Customer,

pursuant to the legislation on the protection of personal data and with particular reference to the provisions on electronic communications of Legislative Decree 196/2003 (the so-called Privacy Code), Telecom Italia Sparkle S.p.A., hereinafter "SPARKLE", provides you with the information regarding the processing of your data and, where it acts by virtue of a specific mandate with representation in the name and on behalf of the companies of your Group, those of the companies of your Group.

1) Categories of data that SPARKLE acquires and processes:

a) data relating to the customer, such as: company name/entity name; tax code/VAT number; contact details (telephone numbers, postal and email address); data relating to the performance of the economic activity, data relating to the products sold and the services activated; invoicing data; payment data (e.g. current account); data on the status and punctuality of payments; data relating to telephone and/or telematic traffic (the so-called traffic data); data relating to the connection (e.g. IP address) and internet browsing ; possibly profiling data; data relating to products; equipment and devices used (e.g. brand and model) and technical data; data relating to contacts made with SPARKLE;

b) common personal data, pursuant to art. 4, point 1, GDPR, of the owner/legal representative, of the customer's authorised contact person and, where applicable, of the end users, such as: personal data (name, surname); contact data (landline and/or mobile telephone number, email address); access and identification data (username, password).

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

The above data, provided by you and/or acquired from third parties also during the contractual relationship, will be processed by SPARKLE for the purposes related to the execution of the contract, including the pre-contractual phase, including: **a)** the provision of electronic communication services and any other service requested; **b)** construction and technical maintenance of systems, IT/telematic systems and/or connections; **c)** installation, delivery and maintenance of products and/or equipment; **d)** invoicing **e)** assistance and management of any complaints and disputes; **f)** customer satisfaction survey; **g)** management of late/missed payments and credit recovery; **h)** access to the services offered on company websites/portals.

Furthermore, the aforementioned data may be processed by SPARKLE for the pursuit of its legitimate interest to a strictly necessary and proportionate extent for: **i)** the prevention of defaults and fraud; in this regard SPARKLE may verify the information communicated by the customer by transmitting such data to appointed companies (Forums International Ltd, an association reserved for credit, finance and risk professionals in the telecommunications sector) **ii)** guarantee the security of networks and information systems ; **iii)** transmit them within the TIM Group for administrative purposes .

The data may also be processed by SPARKLE to assert or defend its own rights in court, as well as to fulfill the obligations established by laws, regulations or community standards and by provisions of the supervisory authorities of the sector or other legitimate institutional bodies.

The processing of data is necessary to achieve the purposes mentioned above; failure to provide them, or their partial or incorrect provision, could result in the impossibility of providing the requested services.

3) Further purposes of processing that can be pursued with prior consent

3.1 In the event that you have given specific consent at the time of activation of the requested service or subsequently, your data and, if you act by virtue of a specific mandate with representation, those of the companies in your Group may be processed by SPARKLE using automated contact methods (such as SMS, MMS , fax, e-mail and web applications) and traditional methods (such as telephone calls with an operator) for *marketing* purposes , i.e. those of sending advertising material, carrying out market research and commercial communication, with regard to the offer of SPARKLE products and services.

3.2 Furthermore, if you consent, your data and, if you act by virtue of a specific mandate with representation, those of the companies of your Group (including the methods of use and access to the service, the devices used, traffic and internet browsing data) may be processed by SPARKLE for profiling activities in order to identify, also through electronic processing, your specific behaviors and consumer habits and those of the companies of your Group in order to improve, also from a quality point of view, the services provided, satisfy your needs and those of the companies of your Group and direct commercial proposals of interest. However, SPARKLE retains the possibility of processing the aforementioned data in aggregate form, in compliance with the measures prescribed by the Italian Privacy Authority and by virtue of the specific exemption from consent on the basis of a legitimate interest of SPARKLE provided for by the same Authority and/or by the data protection impact assessments that SPARKLE has previously carried out. Such aggregate processing is carried out in order to carry out electronic analyses and processing (e.g.: classification of the entire customer base into homogeneous categories by service levels, consumption, possible needs, satisfaction with the service, etc.) aimed at periodically monitoring the development and economic performance of SPARKLE's activities, orienting the related industrial and commercial processes, improving services and tariff plans, designing and implementing commercial communication campaigns through targeted and qualitatively more satisfactory offers. Furthermore, after anonymization, the aforementioned data may be used for processing with the sole purpose of producing statistical analyses, without any direct effect on individual customers. For the methods of exercising the right to object, please refer to the following point **9)** .

Telecom Italia Sparkle SpA

With sole shareholder, Tim Group
Management and Coordination Tim SpA
Registered office: Via di Macchia Palocco, 223 - 00125 Rome
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Company Register, Tax Code and VAT No. 05305181009
Share Capital € 200,000,000.00 fully paid
PEC adminpec@tisparkle.telecompost.it

4) Revocation of consent

The release of data and consent to their use for the processing purposes referred to in the previous point **3)** is optional, but can be used to improve our products and services. You may, however, verify and revoke any consent provided for this purpose at any time, with a written request to the email adminpec@tisparkle.telecompost.it. You also have the right to partially object to the processing of your data for marketing purposes (via automated or traditional contact methods). Following any denial or revocation of the aforementioned consent, SPARKLE will process your data and, if it acts by virtue of a specific mandate with representation, those of the companies of your Group for the sole purposes indicated in the previous point **2)**.

5) Data retention

SPARKLE will retain the data for a period of time not exceeding the achievement of the purposes for which they are collected or subsequently processed, as well as for the period required by law for administrative purposes, management of any complaints, disputes or criminal proceedings. In particular, profiling data will be retained for 15 months, while data relating to telephone and/or telematic traffic will be retained from the date of generation: **a)** for a maximum period of six months for billing purposes, except for further specific retention of up to 15 months for wholesale traffic in consideration of the necessary harmonization of retention periods also governed by national regulations of other European and non-European countries; **b)** for the period indicated in the contracts you may have stipulated for the purpose of supplying value-added services and marketing electronic communication services; **c)** up to seventy-two months for criminal purposes.

6) Methods and logic of processing

The data processing will be carried out manually and/or through computer and telematic tools, with data organization and processing logics, related to the purposes indicated above and, in any case, in a way to guarantee the security and confidentiality of the data and communications. In particular, the data will be processed with automated procedures to: **i)** identify, at the time of the call within the scope of assistance services, the type of customer, the related contract and the device used, to respond effectively to requests; **ii)** profile customers who have provided consent to address commercial proposals of interest; **iii)** make a decision regarding the supply or not of the requested products/services, for the purposes of preventing defaults and fraud.

7) Data Controller, Data Protection Officer and categories of persons authorised to process data in SPARKLE

The Data Controller of your data and, if acting by virtue of a specific mandate with representation, of those of the companies of your Group is Telecom Italia Sparkle S.p.A., with registered office in via di Macchia Palocco n. 223 - 00125 Rome. SPARKLE has appointed a *Data Protection Officer*, who can be contacted at TIM at the following address: via Gaetano Negri n. 1 - 20123 Milan; or by sending an e-mail to: dpo.tisparkle@telecomitalia.it. The updated list of contact details of the *Data Protection Officer* can be consulted on the website www.gruppotim.it, privacy link.

Your data and, if you act by virtue of a specific mandate with representation, those of the companies of your Group will be processed by SPARKLE employees, who have been authorised to process personal data and have received adequate operating instructions in this regard.

8) Categories of third parties to whom the data may be communicated in their capacity as Data Controllers or who may become aware of them in their capacity as Data Processors

In addition to SPARKLE employees, some processing of your data and, if you act by virtue of a specific mandate with representation, of that of the companies of your Group may be carried out by third parties, including the companies of the Telecom Italia Group, to whom SPARKLE entrusts certain activities (or part of them) to pursue the purposes referred to in point **2)** and, if you have given your consent, for the additional purposes referred to in points **3)**. Such third parties may also be established abroad, in EU or non-EU countries; in the latter case, the transfer of data is carried out by virtue of the existence of a decision by the European Commission regarding the adequacy of the level of data protection of the non-EU country or on the basis of the appropriate and suitable guarantees provided for by articles 46 or 47 of the GDPR (e.g. signing the "standard data protection clauses" adopted by the European Commission) or the additional conditions of legitimacy for the transfer provided for by art. 49 of the GDPR (e.g. execution of the requested or existing contract, customer consent). These subjects will operate as independent Data Controllers or will be designated as Data Processors and are essentially included in the following categories: **a)** subjects to whom SPARKLE entrusts the construction, maintenance of systems, IT/telematic systems and connections and/or the delivery, installation, maintenance of equipment and products; **b)** subjects (e.g. call centers) to whom SPARKLE entrusts assistance, advertising, promotions and sales activities to customers; **c)** subjects to whom SPARKLE requests the verification of banking and financial data to verify the accuracy and validity of customer data; **d)** debt collection companies and credit transfer companies; **e)** companies that operate in the field of fraud prevention and that provide credit, economic and commercial information services; **f)** companies that process traffic data for invoicing; **g)** consultants; **h)** agents; **i)** companies that carry out market research and surveys; **l)** Supervisory authorities (e.g. AGCom, AGCM, Italian Privacy Authority), Revenue Agency, Judicial Authority, and any other public body authorised to request the data.

9) Rights recognized to the customer

You may exercise, with reference to the processing of your data and, if you act by virtue of a specific mandate with representation, of those of the companies of your Group, relating to electronic communication services, the rights provided for by articles 15 to 22 of the GDPR (e.g. request the origin of the data, the correction of inaccurate or incomplete data, the limitation of processing, the cancellation or oblivion, the portability of data, as well as oppose their use for legitimate reasons or revoke consent for the purposes referred to in the previous point **3)**), by writing to the address adminpec@tisparkle.telecompost.it. Furthermore, the text of the information always updated can be consulted on the website www.tisparkle.com, [link privacy policy](#).



Consent to the processing of personal data for further marketing purposes, carrying out market research and commercial communication, with regard to the SPARKLE offer (referred to in 3.1)

I declare that I have read the information and freely express my consent to the processing of my data by SPARKLE for marketing analysis, market research and commercial communication, with regard to the SPARKLE offer and the offer of subjects connected to the SPARKLE offer, with automated contact methods (such as sms, mms , e-mail and web applications).

I agree

I do not agree

Consent to the processing of personal data with identification, including through electronic processing, of one's own behaviors and consumer habits in order to improve the services provided, satisfy specific needs and direct commercial proposals of interest (referred to in 3.2).

I declare that I have read the information and freely express my consent to SPARKLE's processing of my data for the identification, including through electronic processing, of my behaviors and consumption habits in order to improve the services provided, satisfy specific needs and direct commercial proposals of interest.

I agree

I do not agree