



Transparency Report pursuant to Regulation (EU) 2022/2065 (Digital Service Act)

Operator: Telecom Italia Sparkle S.p.A. and its subsidiaries falling within the scope of application of the (EU) DSA Regulation.

Note: The information provided in this report regarding Telecom Italia Sparkle S.p.A. is to be understood as referring to and applicable also to the Subsidiaries falling within the scope of application of the (EU) DSA Regulation.

Reference period: 17 February 2024 – 16 February 2025.

1. Introduction

Telecom Italia Sparkle S.p.A. is an Italian telecommunications operator, operating mainly in the wholesale market. This transparency report is drawn up in accordance with the obligations established by Regulation (EU) 2022/2065 (Digital Services Act - DSA), with particular reference to Articles 15 and 24, which require intermediary service providers to publish transparency reports on moderation and management of reports.

Telecom Italia Sparkle S.p.A. is a provider of intermediary services pursuant to Article 3 of Regulation (EU) 2022/2065 and this report has been drawn up in accordance with the provisions of Annex 2 Part 1 point 3 of the Commission Implementing Regulation (EU) 2024/2835 of 4 November 2024. The document is published online on the company's official website at <https://www.tisparkle.com/digital-services-act> for easy and clear consultation.

Telecom Italia Sparkle S.p.A. is committed to ensuring maximum transparency and compliance with European regulations, ensuring its users and competent authorities

Telecom Italia Sparkle SpA

With sole shareholder, TIM Group
Management and Coordination TIM SpA
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Share Capital € 200,000,000.00 fully paid
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have access to clear and updated information on content management and cooperation with authorities.

Telecom Italia Sparkle S.p.A. mainly offers simple data transport services (so-called *mere conduit*), which consist in the transmission of information on communication networks without any manipulation or intervention on the transmitted contents, nor any possibility of access to them. Such services include, by way of example:

- Internet exchange points, wireless access points;
- Virtual private networks;
- DNS resolvers and services;
- Voice over IP and other interpersonal communication services.

Telecom Italia Sparkle S.p.A., provides a single information storage service (so-called *hosting*), which allows users to store and manage their data in a cloud environment.

2. Contact points and reporting mechanisms

In accordance with Articles 11, 12 and 18 of the Regulation (EU) 2022/2065, Telecom Italia Sparkle S.p.A. has made the following contact points available on its website:

- **Contact point for the competent authorities** *pursuant to* Article 11 of the DSA, to allow Telecom Italia Sparkle S.p.A., as an intermediary service provider, to communicate directly with the authorities, the Commission and the Committee of Authorities.
- **Contact Point for users** *pursuant to* Article 12 of the DSA to allow recipients of the service to communicate directly and rapidly with Telecom Italia Sparkle S.p.A., electronically and in an easily usable manner through a single contact point.
- **Communication channel for reporting suspected criminal offences** *pursuant to* Article 18 of the DSA, Telecom Italia Sparkle S.p.A., also in its capacity as a

provider of information storage services, if it becomes aware of information that gives rise to the suspicion that a crime involving a threat to the life or safety of one or more persons has been committed, is being committed or is likely to be committed, inform without delay the judicial or law enforcement authorities of the Member State or Member States concerned of his/her suspicions, providing all relevant information, through a dedicated communication channel.

These contact points are indicated on the company's official website at <https://www.tisparkle.com/digital-services-act> and are constantly updated to ensure effective interaction with users, regulators and other interested parties.

3. Reports and content moderation

Telecom Italia Sparkle S.p.A., as a provider of intermediary services, includes, in its general conditions, information on the restrictions it imposes in relation to the use of its services regarding the information provided by the recipients of the service *pursuant to* Article 14 of the DSA. These information on restrictions concern only the information storage service (so-called *hosting*) as they are not applicable to mere data transport services (so-called *mere conduit*).

During the reference period (**17 February 2024 - 16 February 2025**), Telecom Italia Sparkle S.p.A. did not receive any reports of any kind relating to illegal content or alleged violations of the conditions of use of its services. Consequently:

- No content has been removed or disabled based on reports.
- No measures were taken against users.

4. Advertising activities

Telecom Italia Sparkle S.p.A., is a provider of intermediary services pursuant to Regulation (EU) 2022/2065 and, as such, is not subject to the advertising transparency obligations for online platforms and very large platforms (VLOPs) under Articles 24 and 30 of the DSA. Therefore, there is no reporting or disclosure obligation in relation to advertising (commercial communications).

5. Cooperation with authorities

Telecom Italia Sparkle S.p.A. has established internal processes for the execution of orders from competent national judicial or administrative authorities on the basis of applicable Union law or applicable national law in compliance with Union law. With regard to orders to combat illegal content pursuant to Article 9 of Regulation (EU) 2022/2065, Telecom Italia Sparkle S.p.A. has implemented a system for the receipt, evaluation and timely execution of such orders, ensuring that they are managed in compliance with the provisions of the law. With regard to orders to provide information pursuant to Article 10 of Regulation (EU) 2022/2065, Telecom Italia Sparkle S.p.A. has established procedures to verify the legitimacy of requests and to transmit the requested data in compliance with the legislation on the protection of personal data (EU Regulation 2016/679, General Data Protection Regulation). In the reporting period (**17 February 2024 - 16 February 2025**), Telecom Italia Sparkle S.p.A. did not receive any order to act against illegal content by the relevant authorities regarding the removal of content or the sharing of user specific information pursuant to Articles 9 and 10 of Regulation (EU) 2022/2065. Consequently, it was not necessary to provide any response to the authorities, nor to describe the measures taken to remove illegal content or to manage user data.

6. Internal management and execution processes

Telecom Italia Sparkle S.p.A. has established specific internal processes dedicated to ensuring the execution of the obligations arising from Regulation (EU) 2022/2065. These processes concern:

- **Management and execution of orders *pursuant to* Articles 9 and 10 of the DSA.** Telecom Italia Sparkle S.p.A. has implemented internal procedures for the timely receipt, analysis and execution of orders from the competent authorities for the removal of illegal content or the provision of information on users.
- **Management of communications *pursuant to* Articles 11 and 12 of the DSA.** Telecom Italia Sparkle S.p.A. has established mechanisms to effectively process any communications with the competent authorities and users, ensuring that requests and reports are managed transparently and in compliance with the regulations.
- **Management and execution of notices *pursuant to* Articles 16 and 17 of the DSA.** Telecom Italia Sparkle S.p.A., in relation to its hosting service, has established a structured system to receive and process notices of illicit content, evaluating requests and adopting appropriate measures within the timeframes established by the Regulation.

Telecom Italia Sparkle S.p.A. also specifies that, as a provider of intermediary services and given the nature of its services, it has not adopted any measures of its own initiative for the moderation of content nor has it introduced automated tools for the detection of illicit content or violations of the terms of service.

7. Conclusions

Telecom Italia Sparkle S.p.A. confirms its commitment to respecting the principles of transparency and compliance established by Regulation (EU) 2022/2065. The company will continue to monitor and update its processes regarding the management of reports and cooperation with the authorities, ensuring full compliance with current regulations.

For further information or to contact Telecom Italia Sparkle SpA, please refer to the contact points available on the company's official website.