

INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 ('GDPR')

IRIDEOS S.p.a. hereafter provides information on the processing of personal data (the "Data") of its customers, including potential customers, of third parties representing them (legal representatives, proxies, etc.) and of those who provide their Data by accessing the website www.irideos.it and other websites of our group and our newsletters.

WHO WE ARE

The Data Controller is IRIDEOS S.p.a. with registered office in Milan, Viale Bodio, 37. We can be contacted by simple communication to the e-mail address gdpr@irideos.it regarding the protection of your Data.

HOW WE COLLECT DATA

We collect Data from data subjects, through our call centres, and by other means of contact, such as, for example, our websites and applications on mobile devices such as tablets and smartphones.

We also collect Data through third parties, such as our business partners, marketing and market research companies and financial risk centres.

Finally, we may collect Data from public sources, such as registers, lists and freely accessible documents (such as balance sheets or Chamber of Commerce visas), as well as from sources such as printed or digital newspapers, information from telephone directories, and from the websites of public bodies and supervisory and control authorities.

THE DATA WE PROCESS

We process your Data in order to provide electronic communication services and other complementary and ancillary services and products. These mainly are:

- personal data, tax code, VAT number, address of residence and/or domicile, telephone numbers, e-mail addresses,
- data of the data subject collected for the purchase of Sim Cards and other products and/or services, through authentication systems according to applicable regulations, such as advanced electronic signature verification ('FEA') and remote image capture;
- personal data, tax code, VAT number, address of residence and/or domicile, telephone numbers, e-mail addresses of the persons appointed by you to do business with our Company;
- telephone and telematic traffic data;
- bank and/or payment data (e.g. Iban and swift codes);
- data on the degree of solvency and punctuality of payments, also acquired through information systems of authorised companies providing services for credit risk management and fraud prevention;



- data on the customer's consumption habits and/or interests;
- voice recordings within customer care services;
- special data within the meaning of Article 9 of the GDPR, if collected for the activation of certain services (also in favour of specific categories of data subjects, such as the blind or deaf);
- judicial data, processed for the performance of compulsory justice services.

WHAT ARE THE PURPOSES OF THE PROCESSING

PURPOSE OF PROCESSING	LEGAL BASIS
<p>Information requests and newsletter subscription</p> <p>Data processing takes place through access to the website www.irideos.it and the other websites we administer and through subscription to our newsletter, in order to provide you with the requested information and update you on our offers.</p>	<p>The processing is necessary for the execution of the terms of use of our sites, as set in the "Legal Notes" available on the same. Subscription to the newsletter is based on the consent you have given, which you may withdraw at any time exercising the unsubscribing option at the bottom of the newsletter.</p>
<p>Execution of pre-contractual activities and performance of the contractual relationship</p> <p>The processing of the Data is carried out for the purpose of registration, the performance of pre-contractual activities and the execution of the contractual relationship and the activities arising therefrom, such as the provision of our services, the billing thereof and the management of payments, the provision of support services, the eligibility for any benefits and/or concessions, the examination of complaints and reports to customer service, the sending of communications and any other activity arising from the contractual relationship.</p>	<p>The processing is necessary for the performance of pre-contractual activities and the execution of the contract signed with our Company. Refusal to provide the Data may impair the execution of the contractual relationship with our Company and the provision of the services you have requested.</p>
<p>Purchase and activation of Sim Cards and other products and/or services through authentication systems according to applicable regulations, such as advanced electronic signature verification ('FEA') and remote image capture</p> <p>Data processing is carried out for the purchase and activation of Sim Cards and other products and/or services with the above-mentioned authentication systems.</p>	<p>The processing is necessary to enable our company to fulfil legal obligations to which it is subject and to comply with measures taken by judicial authorities and/or other supervisory authorities.</p>
<p>Fulfilment of legal obligations</p> <p>The processing of the Data collected is carried out for the fulfilment of our Company's administrative, accounting and tax obligations, for the exercise of the right of defence in extra-judicial and/or judicial and/or arbitral proceedings and for the fulfilment of measures of the judicial authorities aimed at the prevention and suppression of crimes.</p>	<p>The processing is necessary to enable our company to fulfil its legal obligations, to exercise its right of defence in extra-judicial and/or judicial and/or arbitration proceedings and to comply with any measures taken by judicial and/or other supervisory authorities.</p>



Payment services and verification of the reliability and punctuality of payments of prospective contractors and customers and fraud prevention

Data processing takes place by accessing the information systems of companies and third parties that provide payment verification, credit risk management and fraud prevention services.

Carrying out marketing activities by sending commercial communications relating to services and/or products similar to those covered by your contract

Data is processed in order to send you, by e-mail, notices and commercial offers concerning products and/or services similar to those provided under existing contractual relationships.

Conducting customer satisfaction survey services

Data processing is carried out to carry out customer satisfaction survey services by sending out forms in order to improve the quality of the services offered.

Verification of the quality's services provided to Customers and the training of call centre operators.

Data processing is made by listening to inbound and/or outbound calls recordings.

Data processing for profiling purposes

The processing of personal data, contact information, information relating to the customer's consumption habits and/or interests is carried out to perform automated and/or manual analysis activities aimed at detecting the customer's preferences, choices and consumption habits in order to improve our services and products and propose targeted commercial offers.

Processing for the purpose of aggregate profiling of traffic data

Processing for the purpose of aggregate profiling of traffic data is carried out to improve the services provided by the company and related technologies.

The processing is based on our company's legitimate interest in the use of payment verification services, *credit check* and fraud prevention activities.

You have the right to object at any time to this processing in the event of particular situations affecting you.

The processing is based on our company's legitimate interest in carrying out commercial communication activities to its customers as outlined below.

You have the right to object at any time to this processing in the event of particular situations affecting you.

The processing is based on our company's legitimate interest in carrying out activities to improve the quality of its services.

You have the right to object at any time to this processing in the event of particular situations affecting you.

The processing is based on our company's legitimate interest to check the quality of the services provided to Customers, through Customer Care and to verify the training levels of call centre employees.

You have the right to object at any time to this processing in the event of particular situations affecting you.

The processing is based on the consent given by you before the start of the relevant operations, which you may revoke at any time by sending a simple communication to the e-mail address gdpr@irideos.it. Any refusal to give consent or subsequent withdrawal of consent shall have no prejudicial effect on you.

The processing is based on our company's legitimate interest in carrying out activities to update and develop its services.

You have the right to object at any time to this processing in the event of particular situations affecting you.



Processing for the management of extra-judicial, judicial and regulatory litigations

Processing is carried out to ensure the proper management of the company's judicial and regulatory litigations.

Processing for the prevention and resolution of telephone and computer traffic fraud

Processing is carried out to prevent and solve cases of fraud relating to telephone and telematic traffic.

The processing is based on our company's legitimate interest in carrying out the management of the extra-judicial judicial regulatory litigations related to its business activities. You have the right to object at any time to this processing in the event of particular situations affecting you.

The processing is based on the legitimate interest of our company in carrying out its activities to protect itself and its customers in the event of danger of fraud or fraud occurring in connection with the processing of telephone and telematic traffic.

Without prejudice to legal and/or regulatory litigations, you have the right to object at any time to this processing in the event of particular situations affecting you.

THIRD PARTIES TO WHOM WE MAY DISCLOSE DATA

For the execution of the contract, the fulfilment of legal obligations, the pursuit of our legitimate interests, we may disclose the personal data collected to the following categories of persons

- legal entities and/or individuals performing data processing and processing services for the purpose of marketing our services and products;
- banking and financial institutions and other payment service providers and for credit risk management and fraud prevention;
- legal persons and/or individuals carrying out market surveys and customer satisfaction survey services;
- legal persons and/or individuals who provide services for the management of our information systems for the exercise of our business activities;
- legal persons and/or individuals providing services of a technical and organisational nature;
- legal persons and/or individuals providing data entry, storage and management services;
- legal persons providing advanced electronic signature solutions ('FEA'), image acquisition from and/or other video recognition activities of the data subject;
- legal persons and/or individuals performing direct and indirect customer care activities ('customer care');
- legal persons and/or individuals performing control, auditing and certification functions of the activities carried out by our Company;
- legal persons and/or individuals performing consultancy work for our Company;
- commercial and/or sales agents and business brokers;
- other electronic communications operators, for the management of interconnection and roaming relationships;
- legal persons and/or individuals assignees of the claim and debt collection companies/institutions;



- legal persons and/or individuals carrying out activities of transmission, enveloping, transport and sorting of communications to customers;
- our controlled or related companies;
- subsidiary and associated companies;
- judicial and independent authorities, by virtue of orders issued in accordance with the regulations in force.

The list of third parties to whom we disclose data is available on request from the data subject.

With the exception of the competent judicial and independent authorities, the aforementioned entities will process the personal data acquired as data controllers or joint data controllers on our behalf.

Your Data may also be known to our employees, interns, temporary workers and consultants specifically authorised to process them, but will not be disclosed and/or made available to unspecified parties in any way.

HOW WE PROCESS DATA

Your Data are collected, processed and stored in a lawful manner and for the purposes stated above, manually and with the aid of electronic and/or automated means, in such a way as to guarantee their security and confidentiality.

WHERE WE PROCESS DATA

Your data is stored in archives located in countries of the European Union

If necessary to pursue the purposes outlined above, they may be transferred abroad, including to countries and/or organisations outside the European Union that provide a level of protection of personal data deemed adequate by the European Commission, or on the basis of other appropriate safeguards, such as, for example, standard contractual clauses adopted by the European Commission or the provision of your consent.



HOW LONG WE PROCESS DATA

Your Data will be kept in a form that permits your identification for no longer than is necessary to achieve the purposes for which it was collected and in application of the provisions governing the electronic communications sector. Once these terms have expired, they will be deleted or transformed into anonymous form, except for their further storage to fulfil obligations that exist after the termination of the contract and to comply with orders issued by judicial authorities and/or regulatory and supervisory bodies.

Below is a specific indication of the retention periods of the main Data processing operations carried out:

Pre-contractual activities	up to 24 months after data collection
Fulfilment of legal obligations	up to 10 years after termination of the provision of services/products
Administrative, accounting and tax purposes	up to 10 years after termination of the provision of services/products
Customer identity authentication through video images	up to 10 years after termination of the provision of services/products
Storage of the service access form with advanced electronic signature ("FEA") and the identity documents provided.	up to 20 years from the collection of the indicated personal data
Checking the degree of financial reliability, solvency and fraud prevention	for the duration of the contractual relationship
Retention of telephone and/or telematic traffic data for the purpose of investigating and prosecuting offences	12/24/72 months, according to specific legal provisions
Purpose of investigating and prosecuting offences	12/24/72 months, according to specific legal provisions
Processing of telephone and/or telematic traffic data for service billing purposes	up to 6 months, unless extended for the handling of disputes
Marketing purposes	until revocation of consent or 24 months after termination of the contractual relationship
Profiling for marketing purposes	until revocation of consent or 24 months after termination of the contractual relationship
Aggregate profiling of traffic data	24 months after termination of the contractual relationship
Processing for the performance of direct marketing activities	24 months after termination of the contractual relationship unless the right to object is



	exercised in accordance with Article 21, paragraphs 2. and 3. of the GDPR
Data processing related to judicial and regulatory litigations	For the duration of the contractual relationship, such terms being delayed in case of pending litigations with customers and/or users of our company's websites
Processing of telephone and telematic traffic data for fraud prevention and management	for the duration of the contractual relationship, such term being delayed in case of pending litigations
Call recording processing in order to verify the quality of the services and the customer care competencies.	up to 6 months after registration.

YOUR RIGHTS

In accordance with the GDPR, you may exercise the following rights:

- have access to your Data in order to obtain information on their existence, the purposes of processing, the recipients or categories of recipients to whom the Data have been or will be disclosed, and the period for which the Data are stored;
- request and obtain the amendment and/or rectification of Data that you consider to be inaccurate and/or incomplete;
- request and obtain the deletion and/or limitation of the processing of your Data if it is not necessary for the performance of the contract, the pursuit of a legitimate interest of our Company and/or the fulfilment of legal obligations;
- object, at any time, to the processing of your Data, including profiling, under the terms of Article 21 of the GDPR;
- request and obtain your Data - in a structured, commonly used and machine-readable format - for portability to another data controller.

You may exercise the aforementioned rights, either directly or through a proxy, by sending a simple communication to the e-mail address gdpr@irideos.it.

We shall comply with the relevant requests within the time limits set out in Article 12(3) of the GDPR.

Pursuant to the applicable regulations, you may lodge a complaint regarding the processing of your Data with the Data Protection Authority, as well as take legal action in line with Articles 78 and 79 of the GDPR.

DATA PROTECTION OFFICER

We have duly appointed a Data Protection Officer, domiciled at our registered office, who can be contacted at rdp@irideos.it.



