

## **Web privacy policy & Cookies**

This Privacy Policy aims at describing how this Site is managed with regard to the use of cookies and other tracking tools (hereinafter referred to for simplicity as "cookies") and the processing of personal data of users/visitors who use the website.

It is provided pursuant to Regulation 2016/679/EU (General Data Protection Regulation - hereinafter GDPR), Article 122 of the Personal Data Protection Code (Italian Legislative Decree 196/03, the Privacy Code) and the General Provision of the Italian Data Protection Authority of 8 May 2014 on cookies, as supplemented by the Italian Personal Data Protection Authority Guidelines of 10 June 2021 on cookies and other tracking tools, for those who connect to the site: <https://wcap.tim.it>.

This Privacy Policy is provided only for the above-mentioned site (hereinafter referred to as "Site" or "this Site") and any sub-domains, but not for other websites that may be consulted by the user via links.

The above website is owned and managed by TIM S.p.A.

TIM S.p.A ensures compliance with legislation regarding data protection, in line with the provisions of the Telecom Italia Group Code of Ethics.

Users/visitors are asked to read this Privacy Policy carefully before submitting any personal information and/or filling in any electronic form on the Site and, in general terms, before using the Site.

### **Type of data processed and purpose of processing**

#### ***1. Browsing data, information for accessing authenticated areas and the storage thereof***

The computer systems and the software procedures used to operate this Site, during their normal operation, acquire some data that are implicitly transmitted when using Internet communication protocols.

This data is not collected in order to be associated with identified data subjects, but by its nature it could, even through processing data held by third parties, allow users/visitors to be identified (e.g. IP address, domain names of the computers used by users who connect to the Site, identifier, brand and model of the device and other parameters relating to the operating system of the device, the code indicating the status of the response given by the server, type of browser, the identifier of the individual session with timestamps of the beginning and the end of the browsing session, possible identifier of the account and of the activities carried out on the Site, etc.).

This data is only used for statistical purposes and to check that the Site is working properly. The data itself is stored for a maximum of six months, without prejudice to further storage for any investigation of computer crimes against the Site or to meet specific regulatory obligations.

Furthermore, in case of authenticated access to the Site, if any, TIM S.p.A will keep the user's personal data, including the data relating to the logs tracking access and activities carried out in the Authenticated Area of the Site, 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 provided for by law for administrative purposes, the management of any complaints, disputes or criminal proceedings.

No data from the web service will be disseminated.

## **2. Cookies**

### ***2.1 General information on cookies***

Cookies are small text strings (file) that websites visited by users send to their devices (usually to browsers or smartphones), where they are stored and then transmitted back to the same sites each time they visit using the same device. In addition, each website may allow the transmission of third-party cookies, i.e. cookies generated by websites other than the one the user is visiting (through objects on it such as banners, images, maps, sounds, specific links to web pages of other domains).

Depending on their duration, a distinction is made between session cookies (i.e. cookies that are temporary and automatically deleted from the device at the end of the browsing session by closing the browser) and persistent cookies (i.e. cookies that remain stored on the device until they expire or are deleted by the user).

Cookies serve several purposes. They are primarily used to carry out the transmission of a communication or to provide the service requested by the user. More specifically, they enable and optimise the operation of the website, perform computer authentication and prevent abuse, monitor sessions, improve the user's browsing experience, for example by maintaining the connection to reserved areas while browsing through the pages of the site without having to re-enter the User ID and password and storing specific information about the users themselves (including preferences, type of browser and computer used). They may also be used (anonymously, if third-party) to carry out aggregate analysis on the operation of the site, the number of users and how they visit the site.

The above-mentioned cookies are called technical cookies (their use does not require the user's consent), since without them some of the operations mentioned above could not be carried out or would be more complex and/or less secure.

On the other hand, if the cookies are used for additional purposes, typically for analysing behaviour and sending personalised promotional/advertising messages (called profiling cookies) or even only to obtain, through services provided also by third parties, information in aggregate form on the number of users and on how they visit the site (called analytics cookies), the user's consent is required (unless the third-party analytics cookies have been anonymised). In fact, before these cookies are sent to your device, in accordance with current legislation, when you access the home page or any other page of the site, a banner is immediately displayed in the foreground with a minimal information notice on the use of cookies and the request for consent, which the user can give by clicking on the "Accept" button or refuse by clicking the "X" at its top right. Alternatively, the user can click on the dedicated panel (also known as the CMP – Cookie-consent Management Platform) to specifically set consent based on the desired cookies.

In any case, cookies can only be read or modified by the website that generated them; they cannot be used to retrieve any data from the user's device and cannot transmit computer viruses. Some of the functions of cookies may also be performed by other technologies; therefore, in the context of this web privacy policy, the term "cookies" refers to cookies and all similar technologies.

## 2.2 Use of first-party cookies on this Site

This Site may use session cookies and persistent cookies.

The types of cookies directly generated by this Site owned by TIM S.p.A are:

- **technical" cookies**, used for: **b)** authentication and management of a browsing session (e.g. to identify and validate the user for access to the Restricted Area); **c)** security purposes (e.g. to take into account the number of failed logins by identifying possible abuses in authentication and preventing fraud); **d)** customisation of the user interface (e.g. to record the preferences expressed by the user such as language, currency, page display format, connection area); **e)** better usability of the site and its audio-visual content; **f)** the proper functioning of the connection (e.g. routing the user's requests between multiple servers in an appropriate manner)
- **profiling cookies**, i.e. cookies that enable the collection of information relating to the user experience, the purchases made and the use of Internet content by users/visitors of this Site in order to identify consumption habits and thus customise contents and ads, send users/visitors targeted advertising in line with their preferences, measure the effectiveness of the advertising message and adopt subsequent commercial strategies. Among the profiling cookies, service personalization cookies could be included: they allow the Site to provide features and/or customizations that are not strictly necessary for its operation but which would improve the use of the service by the user/visitor, such as personalizing the contents of the Site according to interests of the user/visitor.

Before sending these cookies to the device and, therefore, before starting to process the data for these purposes, TIM S.p.A collects the consent of the user/visitor in the following ways: by clicking on the "Accept" button inside the banner containing the minimal information notice or personalised management of cookie consent via the dedicated panel, which can be reached from inside the banner. If the "X" button in the top right corner of the banner is clicked, the user/visitor will deny consent to all profiling cookies. Consent is tracked by sending a special technical cookie to the browser, which ensures the integrity of choices made and traceability to this Site. TIM S.p.A may assign the installation and management of profiling cookies, for which consent must be collected, to technical suppliers (appointed by Skipsolabs Ltd as Data Processor). In particular entrusting the processing of

data by type and purpose, as described in the paragraph "Type of data processed and purpose of processing".

The user/visitor may object to such processing, in addition to clicking the "X" button in the top right corner of the banner, by accessing the dedicated panel (CMP) through the link available in the footer of each page of the Site's domain or by deleting cookies on their browser/device, as indicated in detail in section 2.6 below.

Unless consent is revoked, the user/visitor may receive promotional messages/content based on their interests until the profiling cookies expire. The aforementioned profiling cookies of TIM S.p.A will be stored on the device for 12 months from the last time the user/visitor browsed this Site. Afterwards, it will be automatically deleted from the device.

### 2.3 Analytics cookies

TIM S.p.A uses *web measurement* services to collect aggregate/statistical information on the number of users and how they visit this Site.

Specifically, the service Google Analytics, provided by the company *Google LLC*, is used, configured in such a way that these analytics cookies are treated on a par with technical cookies, in accordance with the Italian Personal Data Protection Authority Guidelines of 10 June 2021.

### 2.4 Third-party cookies

This Site also allows the transmission to the user's device of third-party cookies with which TIM S.p.A cooperates. TIM S.p.A, as a technical intermediary, sends these cookies, but does not have control and access to the information provided/acquired. For these cookies, it is possible to access the information and manage consent of the third parties by accessing the dedicated panel (CMP). For these cookies, it is possible to access the information of the third parties by clicking the link of third parties listed below:

- Facebook
  - Cookies: <https://it-it.facebook.com/policies/cookies/>
  - Privacy: <https://it-it.facebook.com/about/privacy/update>
- Twitter
  - Cookies: <https://help.twitter.com/it/rules-and-policies/twitter-cookies>
  - Privacy: <https://twitter.com/privacy?lang=it#update>
- Google+
  - Privacy: <https://policies.google.com/privacy/update?hl=it&gl=it>
- SlideShare
  - Privacy: <https://www.slideshare.net/privacy>
- LinkedIn
  - Cookies: <https://www.linkedin.com/legal/cookie-policy>
  - Privacy: <https://www.linkedin.com/legal/privacy-policy>
- Flickr
  - Privacy: <https://flickr.com/help/privacy>
- YouTube
  - Privacy: <https://policies.google.com/privacy/update?hl=it&gl=it>
- Pinterest
  - Privacy: <https://policy.pinterest.com/it/privacy-policy>
- Instagram

- o Privacy: <https://help.instagram.com/519522125107875>
- o Cookies: <https://help.instagram.com/1896641480634370>

### 2.5. Cookie coding criteria and retention times

The semantic coding criteria and the retention periods laid down for each cookie can be consulted in the dedicated panel for cookie settings and related consent (CMP).

### 2.6 Managing your cookie preferences

Cookies can be managed by the user through their browser or from this Site.

#### A) Browser settings

The user/visitor can manage cookie preferences through the functionalities present in common browsers (Internet Explorer, Mozilla Firefox, Google Chrome, Apple Safari), which allow users to delete/remove cookies (all or some) or to change the settings of the browser itself in order to block the sending of cookies or to limit it to specific sites (as opposed to others). It is possible to find out how to configure the browser settings (usually accessible from the 'Tools' bar) by going to the 'Support' web pages of the providers of these browsers (which can also be found using a common search engine).

Disabling cookies does not in itself preclude the use of the Website's services; however, if all cookies, including technical ones, are deleted/blocked, some operations cannot be performed or will be more complex and/or less secure, such as, performing activities within the website's Restricted Areas (in fact, cookies make it possible to carry out and maintain user identification during the session).

#### B) Managing cookie consent on this Site

The user may choose in relation to the profiling cookies sent by this Site via the dedicated panel (CMP) accessible from the banner, from the link in the footer of each page of the Site domain or by clicking on this link, in order to:

- revoke all or some of the consent already given. In this case, the Site will update the previously installed cookies indicating consent so that the user, depending on the choices made, is no longer subject to profiling by TIM S.p.A by browsing on this Site. This option does not delete the cookies already stored on your device (technical cookies remain active, while profiling cookies for TIM S.p.A and third parties are "blocked" until they expire), but prevents the storage of further profiling cookies;
- deny consent to profiling cookies (e.g. the user/visitor, upon the first visit to this Site, clicks directly on the 'X' button at the top right of the banner or accesses the dedicated panel (CMP), denying consent to all cookies). In this case, the Site sends a denial-of-service cookie to the user's device, which ensures the integrity of the user's choices and traceability to this Site. Depending on the choices made, this Site does not install profiling cookies on the device and therefore the user will not be subject to profiling by TIM S.p.A and/or third parties by browsing this Site.

### **3. Data provided voluntarily by users/visitors**

If users/visitors connect to this Site and send their personal data in order to access certain services, or to make requests by e-mail or filling out web-forms, this involves the acquisition by TIM S.p.A of the sender's address and/or any other personal data, which will be processed exclusively for the purpose of responding to the request, i.e. for the provision of the service.

Personal data provided by users/visitors will only be disclosed to third parties if such disclosure is necessary to fulfil the requests of users/visitors.

### **Processing methods**

Processing is carried out by means of automated and telematic tools and/or manually for the time strictly necessary to achieve the purposes for which the data were collected and, in any case, in accordance with the relevant legislation in force.

### **Optional provision of data**

Apart from what is specified for browsing data, users/visitors are free to provide their personal data. Failure to provide said data may only result in the impossibility of obtaining what has been requested.

### **Data Controller, Data Protection Officer and categories of persons authorised to process data at TIM S.p.A**

The Data Controller is TIM S.p.A., with registered office in Via Gaetano Negri, 1 - 20123 Milan, Italy). TIM has appointed a *Data Protection Officer*, who can be contacted at TIM by writing to the following address: via Gaetano Negri, 1 - 20123 Milan, Italy; or by sending an email to **[dpo.gruppotim@telecomitalia.it](mailto:dpo.gruppotim@telecomitalia.it)** An up-to-date list of the *Data Protection Officer's* contact details can be found at [www.gruppotim.it](http://www.gruppotim.it), Privacy link [\[inserire link https://www.gruppotim.it/en/footer/privacy.html\]](https://www.gruppotim.it/en/footer/privacy.html);

The data of users/visitors of this Site will be processed by employees of TIM S.p.A, who have been appointed as persons authorised to process personal data and have received appropriate operating instructions in this respect.

### **Rights of the data subjects**

Users/visitors have the right to access their data at any time and to exercise the other rights provided for in Articles 15 to 22 of the GDPR (e.g. to request the origin of the data, rectification of inaccurate or incomplete data, restriction of processing, erasure or the right to be forgotten, data portability, as well as the right to object to the use of the data for legitimate reasons), by sending an e-mail to the following address [info.timwcap@telecomitalia.it](mailto:info.timwcap@telecomitalia.it). Finally, users/visitors have the right to lodge a complaint with the Data Protection Authority.

For further information on privacy and to consult the constantly updated Privacy Policy text provided by TIM to its customers, [click here](https://www.gruppotim.it/en/footer/privacy.html) link [\[inserire link https://www.gruppotim.it/en/footer/privacy.html\]](https://www.gruppotim.it/en/footer/privacy.html);

TIM S.p.A

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