



## Privacy policy for purchasers and holders of season tickets

Pursuant to Article 13 Regulation (EU) 679/2016

### Data Controller

Juventus F.C. S.p.A., with its registered office in Via Druento 175 - 10151, Turin, VAT No. 00470470014, which supplies the services which form the subject of this Contract and organises the sporting event, is the Data Controller (hereinafter "Juventus").

### Data Protection Officer.

Juventus has appointed the Data Protection Officer (person stipulated by Art. 37 of Regulation (EU) 2016/679) as the point of contact, including with regard to the data subjects, for questions connected with the processing of the personal data. The DPO may be contacted by writing at the Juventus address specified below and to the following e-mail address: [privacy@juventus.com](mailto:privacy@juventus.com).

### Purpose and nature of provision

Juventus communicates that the personal data provided at the time of purchasing the access pass and the data collected following its use and access to the stadium, including the personal data of the purchasing subject, the personal data of the subject to whom the subscription is registered (the "Subscriber"), and the personal data of third parties to whom the Subscriber can transfer the access pass for the single match (the "Reserve") (the Subscriber and the Reserve also identified below as "Entry Ticket Users"), the data related to the purchased entry ticket, and images and sounds possibly recorded within the stadium, are processed for the following purposes:

- a) the generic personal data of the purchaser and of the User are processed for the sale and subsequent issue of the subscription and/or the entry ticket for the single match transferred with exchange of name, with the possibility of also carrying out checks on them.
- b) the images of entry ticket users are processed for tasks related and instrumental to access to the stadium - including audio-visual recordings made for security reasons - in order to: ascertain relevant conduct pursuant to the Regulation Code of the Transfer of Tickets to Football Matches (so-called Code of Conduct); document and report on the sports event attended by the data subject; and for the purposes of the production of fan entertainment activities (by way of example but not limited to souvenir photos, fan cams, etc.).
- c) the generic personal data of the ticket Users is processed to provide any services offered to the public in relation to access to the stadium. More specifically, the ID document shall be requested to confirm the identity of the user and that it matches the data associated with the entry ticket.
- d) the generic personal data of the purchaser and the ticket users are processed for operational, administrative and accounting tasks. Among the aforementioned purposes are the services associated with the user's personal details with each entry ticket, tasks to verify the actual use of the subscription (stadium entry and/or sale of the entry ticket) for the recognition of the right of first refusal on renewal, sending communications (including electronically) strictly related to the contractual relationship, management of services connected to any refunds, and management of customer support services.
- e) in order to issue the entry ticket for access to the stadium, data relating to the entry ticket users (Member/Reserve) relating to criminal or administrative provisions that entail the enforcement of a ban on entry to stadiums may also be processed if communicated to Juventus by the competent authorities. This also includes data on those who breach the Code Regulating the Sale of Entry Tickets (so-called Code of Conduct).
- f) information regarding the existence of disabilities is processed in order to benefit from special rates reserved for people with disabilities. This activity entails the processing of special categories of data related to the health status of the Subscriber.
- g) the e-mail address of the purchaser may be used to send marketing communications relating to similar products or services (so-called Soft Spamming)
- h) only subject to consent, the personal data and contact details (e-mail address or telephone number) of the purchaser and the Subscriber may be processed for sending commercial communications on promotions of new products and services of Juventus, special offers for its services and products and/or special offers, pre-sales, discounts promoted by Juventus concerning products and/or services agreed with partners/sponsors of Juventus, prize competitions, surveys and market research and/or customer satisfaction surveys ("Commercial and Marketing" purposes).

The personal data is required in order to pursue the abovementioned purposes; therefore, any refusal to provide it could result in it being impossible to use the services described above.

The type of data processed and the legal bases of the processing are as follows:

Type of data	Purpose	Legal basis
Generic personal data (name, surname, date of birth, place of birth, region of residence, e-mail, telephone number) of the purchaser and the users of the entry ticket	a) sale and issue of the ticket	contract execution (Art. 6.1(b) of the GDPR) and legal obligation (Art. 6.1 (c) of the GDPR)
Images of the entry ticket User	b) safety  ascertaining material conduct for the purpose of the "non-acceptance" system (Code of Conduct)  sports event documentation  Fan entertainment activities	Legal obligations (Art. 6.1(c) of the GDPR)  Legitimate interest (Art. 6.1(f) of the GDPR)  Legitimate interest (Art. 6.1(f) of the GDPR)  Consent (Art. 6.1(a) of the GDPR) expressed by participating in the event
Generic personal data and ID document of the entry ticket User	c) provision of service (entry to the stadium)	contract performance (Art. 6.1(b) of the GDPR)
Generic personal data of the purchaser and of the entry ticket User	d) administrative, operational and accounting	contract performance (Art. 6.1(b) of the GDPR)
Measures relating to the entry ticket User	e) prohibited access to the stadium	legal obligation (Art. 6.1 (c) of the GDPR) and legitimate interest (Art. 6.1 (f) of the GDPR)
State of health (disability) of the Subscriber	f) access to special rates	consent (Art. 9.2 (a) of the GDPR) expressed during the data collection phase for the verification of access requirements
E-mail address of the purchaser	g) Soft spamming	Legitimate interest (Art. 6.1(f) of the GDPR)
Contact details of the purchaser and Subscriber	h) Commercial and Marketing	Consent (Art. 6.1 (a) of the GDPR)

### Data processing methods

The data will be processed using electronic and/or digital tools and, in any case, according to the methods and tools that are required in order to guarantee the security and confidentiality of the data, in compliance with the provisions of the current regulations on the subject. More specifically, adequate technical, IT, organisational, logical and procedural security measures will be taken in order to guarantee protection of the data, granting access only to the people authorised to process and specifically instructed by the Data controller or the Processors appointed by the Data controller pursuant to Art. 29 of the GDPR.





#### Categories of recipients and scope of data circulation

The data might be made accessible or disclosed to the following recipient categories for the purposes specified above:

- a) To employees and collaborators of Juventus, in their capacity as authorised data staff (or so-called "authorised data processors"), within the scope of their respective duties and in accordance with the instructions received.
- b) third parties performing activities outsourced by Juventus as its trusted external parties for all or part of certain activities, or whose activity is connected, instrumental to or supporting that of Juventus (service providers). As a non-exhaustive example, the service suppliers may include third parties that carry out maintenance on procedures and/or IT platforms, organisational and management consultants, stadium services, ticket office services, access control, customer care services, parties who carry out technical or organisational duties such as providing press services, enveloping, sending, transport and sorting of communications via automated systems such as e-mails, faxes, SMS or MMS messages, or using traditional methods (e.g. standard mail) or by telephone with operators, digital marketing companies, consultants, etc.). These parties will be appointed as **External Data Processors**. The complete list of Processors is available upon request to Juventus by writing to the company's address or to the email address: [privacy@juventus.com](mailto:privacy@juventus.com);
- c) any entity (Public Authorities included) with access to the personal data pursuant to statutory or administrative measures. In this context, within the scope of the purposes pursuant to point a), it should be remembered that under Italian law (Ministerial Decree of 15/08/2009), personal data can be made available, including telematically, to the police for the latter to ascertain the absence of conditions posing an obstacle to the issue of tickets for access to sporting events, and shall be retained only for the time strictly necessary for the aforementioned checks to be carried out, as provided under the aforementioned legislation.
- d) public and/or private parties, natural persons and/or legal entities acting as **Autonomous Data Controllers** (legal, administrative and tax consultancy firms, judicial authorities, etc.), if such disclosure is required or useful for correct compliance with contractual obligations assumed, legal obligations and for legitimate interests.

More specifically, PG ITALIA, who was entrusted with the service of selling and issuing the entry tickets, processes the personal data of the purchaser in its capacity as autonomous data controller in relation to the sales services it provides through the Official Ticket Shop website. It is also the External Data Processor, appointed and authorised by Juventus to process the personal data of the holders of the entry tickets in relation to the activities it carries out aimed at the assignment and issue of the entry ticket, including checking any impediments pursuant to the purposes described under point e), or for the other operational and access to special rates mentioned in point f).

Juventus stores the data in archives and on servers in the European Union. If Juventus stores personal data on a cloud platform, the data may be processed by cloud service providers on behalf of Juventus and stored in different locations. In any case, the cloud service providers will be required to always store the data on servers located in the European Union.

Some data Processors appointed by our Company could use, in Italy and abroad, (EU countries and non-EU countries) subsidiary or associate companies for personal data processing operations. Where the personal data is processed by the Officer or by a Company of the Officer's Group or by other Sub-Suppliers outside the European Union, or in a territory that does not guarantee an adequate level of data protection recognised by the European Commission, the transfer of the data abroad is covered by specific guarantees designed to protect the personal data (by way of example, by adopting standard contractual clauses, binding company regulations, code of conduct, certifications, etc.).

#### Duration of data processing

The personal data of the User associated with the entry ticket shall be kept for the timescales indicated in Ministerial Decree of 6 June 2005 (or for any other timescale that may be envisaged by the orders and/or legal provisions and/or regulations issued to deal with the COVID-19 epidemiological emergency for purposes of contact tracing).

The personal data of the purchasers and Users of the entry tickets, collected for administrative, operational or accounting purposes, shall be kept for 10 years from the contract expiry. If processed, the data relating to the COVID-19 green certificates will not be kept.

The identity document and certification relating to the disability of the Subscriber, requested for the sole purpose of ascertaining the identity and possession of the requirements to obtain the special rate, will be stored for the time strictly necessary to verify the requirements, following which they will be erased.

The video surveillance images are deleted seven days after the match to which they refer, except in special circumstances requiring them to be retained for longer, in order to protect the company also in court, and in cases where a response must be made to a specific investigative inquiry on the part of the court authority or police.

Data relating to measures taken in relation to the Regulation Code on the Transfer of Tickets (so-called Code of Conduct) will be stored for 10 years from collection for the assessment of previous conduct determining the definition of the duration of the ban.

The sound and video recordings captured in the stadium to present the sporting event to the public are kept as historical archives.

With regard to data processing for soft spamming purposes, the data is retained for the time needed to fulfil those purposes, i.e. until the data subject no longer has an interest, taking utmost care to prevent indefinite data retention and to encourage the exercise of related rights. To this end, without prejudice to the right to withdraw consent at any time, the data is deleted no more than 36 months after the date when the Data Subject ceases interaction with the Club.

The data processed for Commercial and Marketing purposes (when consent for this has been granted) will be retained for as long as there are interactions with Juventus (also meaning access to direct e-mailing, specific landing pages, etc.) and, if such interactions cease, the data will be deleted after three years from the last interaction with Juventus. This is without prejudice to the right to withdraw consent at any time.

#### Data Subject Rights

Lastly, note that the data subject has specific rights, including those relating to obtaining confirmation of whether or not their personal data is present, even if not yet recorded, the intelligible communication of that data, its origin and the logic and purpose of its processing. Furthermore, the data subject can demand the deletion, restricted processing, transformation into anonymous form or blocking of data processed in breach of the law, as well as the updating, correction or, if interested, data integration and portability of the data to another Data Controller.<sup>1</sup> The data subject also has the right to fully or partially object to the processing of their personal data for legitimate reasons, even if pertaining to the purpose of collection, and to withdraw their consent if the processing is based on those reasons. The data subject may also complain to the Data Protection Authority in the forms and manners provided for by current regulations. The procedures to follow to exercise those rights are described in the privacy policy published on the Juventus.com website at <https://www.juventus.com/it/privacy>.

<sup>1</sup> These rights are stated in and governed by articles 15-22 of the Regulations. Deletion concerns data processed in breach of the law or if consent is withdrawn, and when there are no other legal grounds for the processing. It is always possible to object with regard to advertising and marketing materials, direct sales or market research. In other cases, it is not possible to object where the Data Controller has legitimate and prevalent reasons or when such objections conflict with the right to legal defence.