

Privacy policy for purchasers and holders of season tickets

Ex art. 13 Regulation (EU) 679/2016

Data Controller

Juventus F.C. S.p.A., with 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.

Data Protection Officer

Juventus has appointed the Data Protection Officer (figure provided for by Art. 37 of Regulation (EU) 2016/679) as the point of contact, also with regard to the data subjects, for questions connected with the processing of the personal data. The DPO may be contacted by writing to the Juventus address specified below and to the following email address: privacy@juventus.com.

Purpose and nature of provision of data

Juventus Football Club S.p.A. (Juventus), in the capacity of controller, informs you that the personal data provided when purchasing the ticket and those collected following use of the same and access to the stadium, including personal data of the purchaser, personal data of the person holding the season ticket ("Member") and personal data of third parties to whom the Member may transfer the ticket for the individual match ("Reserve") (Member and Reserve hereafter known also as "ticket users"), data relating to the purchased ticket and any images and sounds recorded within the stadium, are processed to manage the following **purposes**:

- a) the common personal data of the purchaser and the Member are processed for the sale and consequent issuance of the ticket on which controls may be carried out;
- b) the images of entry ticket users are processed for activities related and instrumental to access to the stadium, including audio-visual recordings made for security reasons, to ascertain relevant conduct pursuant to the Regulation Code of the Transfer of Tickets to Football Matches (known as Code of Conduct) and for documenting and commenting on the sports event attended by data subjects, as well as for the realization of fan entertainment activities (including, but not limited to, "photo memory", "fan cam");
- c) the generic personal data of the ticket users are processed to provide any services offered to the public in relation to access to the stadium; more specifically the ID shall be requested to confirm the identity of the user and the correspondence with 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 activities. Said purposes include services aimed at associating the general details of the user with each entry ticket, sending communications (including electronically) strictly related to the contractual agreement, the management of services connected with any refunds, and the management of customer assistance services;
- e) in order to issue the coupon and ticket 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 accessing stadiums may also be processed if communicated to Juventus by the competent authorities. This also includes data on those who breach the Regulation Code on the Transfer of Tickets (so-called Code of Conduct);
- f) information relating to the existence of disability is processed in order to benefit from special rates reserved for the category of disabled persons, this activity involves the processing of particular categories of data relating to the health status of the Subscriber;
- g) where, in accordance with the measures and/or provisions of law and/or regulations issued and/or being issued by the competent authorities to combat the spread of COVID-19, the COVID-19 green pass is mandatory for public participation in sports competition events, the personal data of entry ticket users (name, surname) may be processed to verify the authenticity, integrity and validity of the COVID-19 green pass;
- h) the email address of the purchaser may be used to send commercial communications relating to similar products or services (known as Soft Spamming)
- i) only subject to consent, the personal data and contact details (email address or telephone no.) of the purchaser and the Member 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 are required in order to pursue the above-mentioned purposes; therefore, any refusal to provide them 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, email, telephone no.) of the purchaser and the users of the entry ticket	a) sale and issue of entry ticket	Performance of the contract (article 6.1, letter b, GDPR) Legal obligations (article 6.1, letter c, GDPR)
Images of the entry ticket user	b) safety checking relevant conduct for the purpose of the "non-acceptance" system (Code of Conduct) documentation of the sporting event fan entertainment activities	Legal obligations (article 6.1, letter c, GDPR) Legitimate interest (article 6.1, letter f, GDPR) Consent (art 6.1 lett.a GDPR) expressed by the participation in the event
Generic personal data and ID document of the entry ticket user	c) provision of service (access to the stadium)	Performance of the contract (article 6.1, letter b, GDPR)
Generic personal data of the purchaser and of the entry ticket user	d) administrative, operational and accounting	Performance of the contract (article 6.1, letter b, GDPR)
Orders relating to the entry ticket user	e) to prevent access to the stadium	Legal obligations (article 6.1, letter c, GDPR) Legitimate interest (article 6.1, letter f, GDPR)
State of health (disability) of the Member	f) access to special rates	Consent (art. 9.2 lit. A GDPR) expressed during data collection for the verification of access requirements
Personal data and contact data of the entry ticket user Generic personal data (name, surname) relating to checking the COVID-19 green certificates;	g) protection of public health and prevention of infection from COVID-19; access to the stadium.	Legal obligations (article 6.1, letter c, GDPR) Public interest reasons (article 9.2, letter g, GDPR)
Email address of the purchaser	h) Soft Spamming	Legitimate interest (article 6.1, letter f, GDPR)



Contact details of the purchaser and Member	i) Commercial and Marketing	Consent (article 6.1 letter a GDPR)
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Method of data processing

The data will be processed using electronic and/or digital tools and, in any case, according to the methods and tools adequate 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 article 29 GDPR.

Categories of recipients and scope of data circulation

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

- employees or collaborators of Juventus in their capacity of authorised processors ("**parties authorised for processing**") within the scope of their duties and in compliance with the instructions received;
- third parties performing outsourced activities on behalf of Juventus in the capacity of its external parties to whom Juventus entrusts some activities, or a part of them, or whose activity is connected, instrumental or supporting that of Juventus (service providers). As a non-exhaustive example, the service suppliers may include third parties who carry out maintenance on procedures and/or computer platforms, organisational and management consultants, stadium services, ticket office services, 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 emails, faxes, SMS or MMS messages, or using traditional methods (for example 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;
- to any entity (Public Authorities included) which has access to the personal data based on statutory and administrative provisions. 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;
- to those public and/or private subject, natural and/or legal persons that operate in the capacity of **autonomous Data Controllers** (legal, administrative and tax consultancy firms, Judicial Authorities, etc.), if such disclosure is required or functional for the correct performance of the contractual obligations taken on, 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 letter e), or for the other operational and administrative purposes described under letter d). and access to special rates referred to in point f).

Juventus stores the data at archives and on servers within the European Union. In the event Juventus stores personal data on a cloud platform, data may be processed by cloud services providers on behalf of Juventus and stored in different locations. In any case, the cloud service providers will be asked to always store the data on servers located within 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 Data Processor or by a company of the Data Processor's group or by other sub-suppliers outside the European Economic Area, 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 (for example, by adopting standard contractual clauses, binding company regulations, codes of conduct, certifications, etc.).

Duration

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 Member, 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, 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, are deleted 7 days after the match to which they refer.

Data relating to measures taken in relation to the Regulation Code on the Transfer of Tickets (known as 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 the data processing performed for the purposes of soft spamming, the data are retained for the time needed to fulfil said purposes, or rather until the recipient of the communication no longer has an interest in the same, taking the utmost care to prevent the data being retained indefinitely and to favour the exercising of the rights of the same. To this end, without prejudice to the right to revoke the consent at any time, the data are deleted within 36 months from when the Data Subject no longer interacts with the Company.

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 direct emailing, 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 Subjects' Rights

Lastly, it is reiterated that the data subject has specific rights, including that of obtaining confirmation of whether or not their personal data exist, even if not yet recorded, the intelligible communication of these data, of their origin and of the logic and purpose of said processing. Furthermore, the data subject can obtain the deletion, restriction to processing, transformation into anonymous form or blocking of the data processed in breach of the law, as well as the updating, correction or, if so interested, the integration of the data and the portability of the data to another Data Controller.¹ The data subject also has the right to fully or partially object to the processing of their personal data for legitimate reasons, even if they pertain to the purpose of the collection, and to withdraw their consent if the processing is based on that. The data subject may also submit a complaint to the Data Protection Supervisory Authority in the forms and ways provided for by current legislation. 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>.

¹These rights are set forth and governed by articles 15-22 of the Regulations. The deletion of data concerns data processed in breach of the law or in case of the revocation of consent and when there are no other legal grounds for the relative 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 would compromise the Data Controller's right to legal defence.