



INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to articles 13 and 14 EU Regulation 2016/679

In compliance with current legislation, defined in accordance with the provisions contained in EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter "**Regulation**" or "**GDPR**"), Juventus Football Club S.p.A. wishes to provide, pursuant to Articles 13 and 14 of the GDPR, the following information relating to the processing of personal data provided by accessing the procurement portal - which manages the supplier qualification, information request and/or bidding processes - (hereinafter the "**Portal**") and using the services provided therein.

1. DATA CONTROLLER

The Data controller is Juventus Football Club S.p.A. (C.F. and P.IVA 00470470014), with registered office in Turin, Via Druento no. 175 (hereinafter "**Juventus**" or "**Company**").

2. DATA PROTECTION OFFICER

Juventus has appointed a Data Protection Officer, who is the point of contact, including with respect to data subjects, for matters related to the processing of personal data (hereinafter "**DPO**"). The DPO may be contacted by sending a communication by e-mail to privacy@juventus.com.

3. DATA SUBJECT TO PROCESSING

Personal data means any information relating to an identified or identifiable natural person. More specifically, the processing will concern the following data

- personal data (name and surname, tax code, address, date and place of birth in the case of a natural person, or name and surname, date and place of birth of the legal representative in the case of a legal person)
 - contact data (telephone number, e-mail address and professional role);
 - any further personal data contained in legal declarations, self-declarations and certifications (including the identity document of the person issuing the self-certification pursuant to Presidential Decree 445/2000)
 - any further personal data of sub-contractors, within the scope of service contracts, possibly also in order to comply with the regulatory provisions of Article 17 of Legislative Decree 241/1997, as amended by Law 157/2019, as well as data required for the performance of Health & Safety procedures;
 - access data (username, e-mail);
- hereinafter, collectively, "**Data**".

4. PURPOSE AND LEGAL BASIS OF PROCESSING

The Data referred to in point 3) above are processed for the following purposes and on the presence of the relevant legal basis:

Purpose	Legal basis
a) registration on the Portal and creation of the relevant personal profile	execution of pre-contractual measures taken at the request of the data subject and performance of the contract (Art. 6.1 lett. b GDPR)
b) provision of the services envisaged and reserved for registered users only, including the possibility to start the supplier qualification process, to participate in the request for information (RFI) and/or request for quotation (RFQ) and/or request for proposal (RFP) submitted by Juventus	execution of pre-contractual measures taken at the request of the data subject and execution of the contract (art. 6.1 lett. b GDPR)



c) verification of the documentation submitted in the supplier qualification process, in the RFI, RFQ, RFP	execution of pre-contractual measures taken at the request of the data subject and performance of the contract (Art. 6.1 lett. b GDPR), as well as fulfilment of a legal obligation (Art. 6.1 lett. c GDPR)
d) conclusion of the contract and performance of administrative-accounting activities (of an organisational, administrative, fiscal and accounting nature)	performance of the contract (Art. 6.1 lett. b GDPR)
e) fulfilment of further contractual and legal obligations connected to the relationship and provided for by national, EU and international laws and/or regulations, by provisions issued by authorities and supervisory and control bodies	performance of the contract (Art. 6.1 lett. b GDPR), as well as fulfilment of a legal obligation (Art. 6.1 lett. c GDPR)
f) computer security of the Portal to carry out the appropriate checks in the event of reports of anomalies	legitimate interest (Art. 6.1 lett. f GDPR)
g) sending commercial communication relating to promotions and special offers of Juventus products and services (e.g. promotional rates on the purchase of match tickets, promotion of premium packages and/or tickets with hospitality), as well as relating to initiatives promoted or organised by Juventus (e.g. B2B forum, events, etc.)	consent (art. 6.1 lett. a GDPR)
h) exercise and defence of the rights of Juventus in all judicial, administrative, arbitration and/or mediation and conciliation proceedings	legitimate interest (art. 6.1 lett. f GDPR)

5. METHODS OF PROCESSING

Within the scope of the purposes set forth in point 4) above, the processing of the Data shall take place mainly by means of IT tools, as well as in paper form, in compliance with the principles on the protection of personal data, adopting adequate security measures. Data processing will be managed by internal Juventus personnel (employees, system administrators and any collaborators involved from time to time in the context of their respective duties in accordance with the instructions received), specifically authorised, trained and instructed, precisely to ensure adequate security and confidentiality, as well as to avoid risks of loss and/or destruction and access by unauthorised parties.

6. RECIPIENTS OR CATEGORIES OF RECIPIENTS

Within the limits strictly pertinent to the purposes indicated in point 4) above, Data may be made accessible and/or communicated to the following categories of recipients:

- subjects external to Juventus who, in their capacity as Data Processors pursuant to art. 28 of the GDPR, process the Data on its instructions (such as, by way of example but not limited to, companies that manage supplier qualification processes, information request and offer procedures, IT service companies, hosting companies, companies that provide event organisation and management services). The complete list of Data Processors is available upon request to Juventus at the e-mail address privacy@juventus.com;
- third parties (i.e. determined parties other than the Data Controller, the Data Processors and the persons authorised to process the data) only in cases where this is required by law or regulation, as well as when it is necessary for the



provision of services provided by the Portal and to achieve the purposes set out in point 4) above. Such persons may be, for example, Public Institutions and/or Authorities, Judicial Authorities, Consultants and Police Bodies.

7. DATA RETENTION

Juventus processes Data for the period of time strictly necessary to achieve the purposes for which they have been collected. Specifically, the Data processed for the purposes as per point 4) letter:

- a) and b) above will be kept until the closure of the profile by the supplier, which can be requested at any time. In the event that the initial qualification process fails, the data will instead be deleted within 12 months of the communication of the negative outcome of the qualification process. Furthermore, in the event of passing the initial qualification process but failing to update the Data and/or requalifying the supplier for more than 24 months, the profile and the data contained therein will be anonymised (in order to guarantee the referential integrity of the database), with the exception of administrative-accounting data (company name, address, tax code, VAT number, bank data, administrative e-mail address) which will be retained for 10 years from the last contractual relationship;
- will be retained for the period of time strictly necessary to achieve the purpose and will be retained for the entire duration of the relationship and, in any case, until the statute of limitations of the rights arising from the same (10 years from its termination)
- and e) will be kept for the entire duration of the relationship and, in any case, until the statute of limitations of the rights deriving from the same (10 years from its termination)
- f) will be retained for the period of time strictly necessary to carry out the relevant checks and ascertain any liability in the event of the commission of computer offences
- g) will be kept for the duration of validity of the supplier's qualification and in any case for a period not exceeding 24 months, always in accordance with the explicit consent expressed by the supplier;
- shall be retained for the duration of the dispute and until the time limit for any appeal and/or for the statute of limitations of the relevant action has been exhausted;

without prejudice, however, to the right to withdraw consent for those processing operations that are based on this legal basis, the exercise of the rights provided for in point 9) below, as well as the fulfilment of specific storage obligations provided for by law.

8. NATURE OF DATA PROVISION

The provision of Data is

- **mandatory** for the pursuit of the purposes set forth in point 4) letters a), b), c), d), e), f), h) above. Therefore, failure to provide even a part of the Data will result in the objective impossibility for Juventus to fulfil its obligations (for example, to allow registration to the Portal and the creation of the personal profile, to allow participation in the qualification process, request for information and/or offer, to proceed with the stipulation of the contract, to fulfil contractual and legal obligations, to guarantee the Portal's IT security and to exercise the right of defence);
- **optional** for the pursuit of the purpose referred to in point 4) letter g) above. Therefore, the failure to provide even a part of the Data entails the objective impossibility for Juventus to send commercial communications relating to promotions and special offers of Juventus products and services, as well as relating to initiatives and events, without, however, prejudicing the pursuit of the further purposes referred to in point 4) letters a), b), c), d), e), f), h) above.

9. DATA TRANSFER

Data are stored at Juventus headquarters and on servers located in the European Union. However, for the provision of certain services by the Data Processors, Data may be transferred to a third country or international organisation. In this case, Juventus undertakes to ensure that such transfer takes place in compliance with the GDPR and, specifically, in the presence of adequate safeguards (adequacy decisions, standard contractual clauses approved by the European Commission, etc.). Further information on the transfer of Data and the guarantees provided for their protection can be requested from Juventus at the e-mail address privacy@juventus.com.

10. RIGHTS OF THE DATA SUBJECTS



With reference to the Data referred to in this statement, the data subject has the right to request from Juventus in the manner indicated by the GDPR and subject to the provisions and limitations referred to in Art. 23 of the GDPR and Art. 2-undecies of Legislative Decree 196/2003 (Part I - Title I - Chapter III)

- access, in the cases provided for (art.15 GDPR);
- rectification of inaccurate data and integration of incomplete data (art. 16 GDPR);
- deletion of data for the reasons provided for (art. 17 GDPR), such as when they are no longer necessary for the purposes indicated above or are not processed in compliance with the Regulation;
- the limitation of processing for the envisaged hypotheses (art. 18 GDPR), such as when the accuracy of the data is contested and its correctness needs to be verified;
- the portability, i.e. the right to receive, in the cases provided for (Art. 20 GDPR), in a structured, commonly used and machine-readable format the data and to transmit said data to another data controller;
- opposition to processing, in the cases provided for (Art. 21 GDPR).

There is also the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject or which affects the data subject in a similarly significant way, if the data subject has not previously and explicitly given his or her consent (Art. 25 GDPR).

Should the processing then be based on consent, there is the right to revoke it at any time without affecting the lawfulness of the processing carried out prior to the revocation.

All rights listed above may be exercised by sending a communication to Juventus by e-mail to privacy@juventus.com or by registered letter to the address of Juventus. For further information on how to exercise the above rights, you may consult the Juventus website at the following address: <https://juventus.com/it/privacy>.

11. COMPLAINTS

If you believe that the processing of your Data violates the provisions contained in the GDPR, you have the right to lodge a complaint with the Guarantor for the protection of personal data in accordance with art. 77 of the GDPR itself.