



## Information notice on the processing of personal data - Stadium Admission Tickets

Pursuant to Articles 13 of Regulation (EU) 679/2016

This information notice is provided in relation to the processing of personal data that Juventus carries out for the purposes of selling, issuing and using the stadium admission tickets and the related services within the framework of the sale agreements for premium club services, standard season tickets, single match tickets or match packages, as well as for the purposes of issuing complimentary tickets and/or granting service passes for access to the stadium on match days (hereinafter, generically referred to as "Admission Tickets").

### 1. Data Controller

Juventus F.C. S.p.A., with registered office at Via Druento 175 - 10151 Turin, VAT No. 00470470014, which provides the services covered by the agreement and organises the sporting event, is the data controller ("Juventus").

### 2. Data Protection Officer

Juventus has appointed the Data Protection Officer (as envisaged in Article 37, Regulation (EU) 2016/679) as the point of contact, also with regard to data subjects, for matters relating to personal data processing. The DPO may be contacted by writing to the Juventus address specified below and to the following email address: [privacy@juventus.com](mailto:privacy@juventus.com).

### 3. Purpose and nature of provision

The personal data provided at the time of purchase and/or application for the Admission Ticket and those collected by means of its use and from the stadium access - including the personal data of the purchaser and/or applicant for the Admission Ticket, the personal data of the person in whose name the Admission Ticket is registered ("Holder") and the personal data of the third party to whom the Admission Ticket may be transferred ("User"), the data relating to the Admission Ticket purchased and/or applied for, the images and sounds that may be filmed inside the stadium -, are processed to manage the following purposes:

- the purchaser's, Holder's and User's common personal data are processed for the purpose of selling and issuing Admission Ticket, making it possible to also carry out checks on them;
- the images of the Admission Tickets' Holder and/or User contained in the audio-visual recordings made through the video surveillance system are processed for security reasons as well as for the ascertainment of relevant conduct pursuant to the Code Regulating the Sale of Admission Tickets to Football Events (so-called Code of Conduct). The Holder's and/or User's images contained in the photographic and/or audio-visual recordings of the event are used for broadcasting on public, private and/or pay-per-view television, cinemas and any other means of communication as well as for editorial use in relation to publishing initiatives implemented by the official communication bodies of Juventus for the purposes of documenting and reporting the sporting event attended by the interested party. Furthermore, the photographic and/or audio-visual recordings containing the Holder's and/or User's images may be used for promotional-advertising and commercial purposes related and instrumental to the promotion and sponsorship of Juventus' and/or its commercial partners' products and/or services, as well as for fan entertainment activities (including, but not limited to, "souvenir photo" and "fan cam" services). Finally, the photographic and/or audio-visual recordings may also be stored and used for possible production of historical evidence (purposes of "historical archive");
- the generic personal data of the Admission Ticket's Holder and/or User 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 Admission Ticket;
- common personal data of the purchaser, the Holder and the User are processed for operational, administrative and accounting purposes. The aforementioned purposes include the services aimed at associating the user's personal details with each admission ticket, the activities for verifying the actual use of the Admission Ticket (access to the stadium and/or sale of the admission ticket) for the purpose of recognising the pre-emption right on the renewal of the season ticket, the sending of communications (including by electronic means) strictly related to the contractual relationship, the management of services related to any refunds and the management of customer care services;
- in order to issue the admission tickets and to access the stadium, data relating to criminal or administrative measures 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 Code Regulating the Sale of Admission Tickets (Code of Conduct);
- information on the existence of a disability is processed in order to take advantage of special rates reserved for persons with disabilities. This activity involves the processing of special categories of data relating to the state of health;
- the purchaser's email address may be used to send commercial communications relating to similar products or services (known as "Soft Spamming");
- only with prior consent, the personal and contact data (email address or telephone number) of the purchaser and the Holder, may be processed to send commercial communications including promotions of Juventus products and services, special offers for Juventus services and products, and/or special offers, pre-sales, discounts promoted by Juventus, concerning products and/or services agreed with Juventus partners/sponsors, prize competitions, surveys and market research and/or customer satisfaction surveys ("Sales and Marketing" purposes);
- the access data and images of the users of admission tickets may be processed for the exercise and defence of the Company's rights in any court, including judicial or administrative, in arbitration and conciliation proceedings as well as out-of-court ("Defence" purposes).

The personal data are required in order to pursue the above-mentioned purposes; consequently, any refusal to provide such data may result in the inability to make use of the services described herein.

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

Type of data	Purpose	Legal basis
Common personal data (name, surname, date of birth, place of birth, region of residence, email, telephone number) of the purchaser/applicant, Holder and/or User	a) establishment, management and performance of the contractual relationship; administrative management of the contract; provision of the service;	a) performance of contract (Article 6.1 letter b GDPR)
	b) management of any litigation;	b) legitimate interest (Article 6.1 letter f GDPR)
	c) fulfilment of legal and regulatory obligations	c) legal obligation (Article 6.1 letter c GDPR)
Common personal data (name, surname, date of birth, place of birth, region of residence, email, telephone number) of the Holder and/or User	d) issue of the Admission Ticket	d) Performance of contract (Art. 6.1 letter b GDPR) and legal obligation (Art. 6.1 letter c GDPR)
Images of the Holder and/or User	e) security	e) legal obligation (Article 6.1 letter c GDPR)
	f) ascertaining conduct relevant for the purposes of the "non-acceptance" system (Code of Conduct)	f) legitimate interest (Art. 6.1 letter f GDPR)
	g) defence	g) legitimate interest (Art. 6.1 letter f GDPR) and
		h) legitimate interest (Art. 6.1 letter f GDPR)



	<div>h) documenting and commenting on the sporting event,</div> <div>i) fan entertainment services at the stadium, promotion of products and/or services of Juventus and/or its partners</div> <div>j) historical archive</div>	<div>i) consent (art 6.1 letter a GDPR) expressed through participation in the event</div> <div>j) legitimate interest (Art. 6.1 letter a GDPR)</div>
Common personal data and identity document of the Holder and/or User	k) provision of service (stadium access)	k) performance of contract (Article 6.1 letter b GDPR)
Measures concerning the Holder and/or User	l) suspension of the service and preventing access to the stadium	l) legal obligation (Art. 6.1 letter c GDPR) and legitimate interest (Art. 6.1 letter f GDPR)
Health status (disability) of the Holder	m) access to special rates	m) consent (Art. 9.2 letter a GDPR) expressed during data collection for verification of access requirements
Purchaser's e-mail address	n) Soft Spamming	n) legitimate interest (Art. 6.1 letter f GDPR)
Contact details of purchaser and Holder	o) Sales and Marketing	o) consent (Art. 6.1 letter a GDPR)

#### 4. 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 conformity 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 Data Processors appointed by the Data Controller pursuant to Article 29 GDPR.

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

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

- employees or collaborators of Juventus in their capacity of persons in charge of processing activities ("**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 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 providers may include third parties who carry out maintenance on procedures and/or computer 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 emails, faxes, text or multimedia 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 Data Processors is available upon request to Juventus by writing to the company's address or to the e-mail address: [privacy@juventus.com](mailto:privacy@juventus.com);
- to any entity (Public Authorities included) which may access the personal data based on statutory and administrative provisions. In this context, it should be remembered that under Italian law (Ministerial Decree of 15/08/2009), personal data can be made available, including electronically, to the police for the latter to ascertain the absence of conditions posing an obstacle to the issue Admission Tickets 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 decree. Likewise, video surveillance images are made available to the public security authorities for the identification of the person concerned;
- 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, which is entrusted with the service of selling and issuing Admission Tickets, processes the personal data of the purchaser as an independent data controller in relation to the sales services provided by the same 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 Holder and/or User in relation to the activities it carries out aimed at the assignment and issue of the Admission Ticket, including checking any impediments pursuant to the purposes described under letter e), or for the other operational and administrative purposes described under Article 3.

Juventus stores the data in 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.

A number of Data Processors appointed by our club could, in Italy and abroad (EU and non-EU countries), use subsidiaries or associates for personal data processing operations. Where the personal data are processed by the Data Processor or by a company of the Data Processor's group or other sub-contractor 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 data abroad is covered by specific guarantees designed to protect personal data (for example, by adopting standard contractual clauses, binding company regulations, codes of conduct, certifications, etc.).

#### 6. Duration of the processing

The User's personal data associated with the Admission Ticket are stored for the lengths of time indicated in the Italian Ministerial Decree of 06/06/2005.

The personal data collected for administrative, operational or accounting purposes will be stored for 10 years from expiry of the contract.

The Subscriber's identity document and certification relating to disability, requested for the sole purpose of ascertaining identity and possession of the requirements to take advantage of the special rate, will be kept for the time strictly necessary to verify the requirements, after which they will be erased.

The video surveillance images, except in special circumstances requiring them to be stored for longer, in order to protect the club also in court, and in cases where a response must be provided to a specific investigative inquiry on the part of the court authority or police, are deleted 7 days after the football event to which they refer.

Data relating to measures adopted in relation to the Code Regulating the Sale of Admission Tickets (Code of Conduct) will be stored for 10 years from collection in order to comply with obligations to assess previous conduct relevant in determining the duration of any ban.

Audio and visual recordings captured inside the stadium as part of the public presentation of the sporting event are stored in the company's archives for historical archiving purposes. In relation to processing for Soft Spamming purposes, data are retained for as long as necessary according to the purposes, i.e. until the interest of the communication recipient may no longer be current, taking every care to avoid indefinite storage and to facilitate the exercise of the rights due to the recipient. To this end, without prejudice to the right to revoke consent at any time, the data are erased within 36 months of the last data subject's interaction with the Company.

The data processed for Sales and Marketing purposes (if consent has been given), will be kept as long as interactions with Juventus exist (intended as access to Direct E-Mailing, specific Landing Pages, etc.) and, in case of termination thereof, the data will be erased after three years from the last interaction with Juventus. This is without prejudice to the right to withdraw one's consent at any time.

#### Data subject rights

Lastly, note that the data subject has specific rights, including that of obtaining confirmation of whether or not their personal data are present, even if not yet recorded, the communication of these data in an intelligible format, their origin and the logic and purpose of their processing. Furthermore, the data subject can demand the erasure, restriction of processing, anonymisation or block 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 object, in whole or in part, on legitimate grounds, to the processing of their personal data, even if pertinent to the purpose of collection, as well as to withdraw consent if the processing is based on it. The data subject may also lodge a complaint to the Italian Data Protection Authority in the forms and manners envisaged in current regulations. The procedures for exercising these rights are described in the privacy policy published on the Juventus.com website at <https://www.juventus.com/it/privacy>.

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<sup>1</sup> These rights are provided for and governed by Articles 15-22 of the Regulation. Erasure concerns data processed in violation of the law or in the event of withdrawal of consent and when there is no other basis of legality for processing. The right to object may always be exercised concerning commercial advertising material, direct marketing, or market surveys; in other instances, the right to object may not be exercised in the presence of legitimate and compelling grounds of the controller or where it conflicts with the right to legal defence.