



Information on personal data processing for purchasers and holders of tickets to individual matches and match packages

Pursuant to Article 13, Regulation (EU) 679/2016

Data Controller

Juventus F.C. S.p.A., with registered office at Via Druento 175 – 10151 Turin, VAT No. 00470470014, which provides the services referred to in this contract and organises the sporting event, is the Data Controller.

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 questions 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.

Purpose and nature of personal data processing

Juventus Football Club S.p.A. (Juventus), in its capacity as Data Controller, declares that the personal data provided by ticket purchases at the time of purchase and the data captured after entering the stadium, including the data on tickets purchased and any images and sounds recorded inside the stadium, is processed for the following purposes:

- the generic personal data of the purchaser and ticket holder/user are processed for the sale and subsequent issue of the ticket to allow the data to be checked if necessary;
- photographs of the ticket holders/users are processed for activities related and instrumental to gaining access to the stadium, including audio-visual recordings made for security reasons, to ascertain material conduct pursuant to the Code of Conduct governing the transfer of football match tickets (Code of Conduct), for documenting and reporting on the sports event attended by the data subject, as well as the production of fan entertainment activities for spectators (for example, souvenir photos, fan cams, etc.);
- the generic personal data of ticket holders/users are processed to provide services provided for any reason to the public in relation to stadium access; more specifically, the ID requested to confirm the identity of the user and that it matches the data associated with the ticket.
- the generic personal data of the ticket holder/user are processed for operational, administrative and accounting activities. The above purposes include services to associate the general details of each holder/user with their ticket, sending communications (including electronically) strictly related to the contractual agreement, the management of services relating to refunds, and the management of customer assistance services;
- the generic data of ticket holders/users are processed in order to record access to the stadium for security purposes. In addition, the data are communicated to the central police systems, in order to verify any prohibited access status that could ban access to the stadium in accordance with the Italian Ministerial Decree of 15 August 2009;
- the generic data of ticket users and the provisions issued by Juventus are processed to identify the person responsible for material conduct pursuant to the Code of Conduct governing the transfer of football match tickets adopted by Juventus (Code of Conduct) and prevent entry to anyone violating this Code;
- in order to use the special prices reserved for people with disabilities, certification has to be shown proving disabled status. This requires the processing of specific data categories relating to the health of ticket users;
- if envisaged in legal or regulatory measures and/or provisions issued in relation to the COVID-19 epidemiological emergency to allow public attendance at events and sporting competitions, the personal data and contact data of ticket users may be processed and kept for up to 14 days from the date of the event. Additionally, to allow access to the stadium, the personal data (name, surname) of the ticket users may be processed in order to check the authenticity, completeness and validity of the Covid-19 green pass and health-related data (body temperature) obtained when checking temperature in real time. The legal basis that legitimises this processing is the implementation of anti-contagion safety protocols, in compliance with current regulations (Article 6(c) and Article 9.2.(g), Regulation (EU) 679/2016)
- the email address of the purchaser may be used to send marketing communications relating to similar products or services (soft spamming).

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 ticket holder/user	a) sale and issue of the ticket	Execution of the contract (article 6.1(b) GDPR) Legal obligations (Article 6.1(c) GDPR)
Images of the ticket holder/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 (Article 6.1(c) GDPR) Legitimate interest (Article 6.1(f) GDPR) Consent (Article 6.1(a) GDPR) expressed by attending the event
Generic personal data and ID document of the ticket holder/user	c) provision of service (access to the stadium)	Execution of the contract (article 6.1(b) GDPR)
Generic personal data of the purchaser and of the ticket holder/user	d) administrative, operational and accounting	Execution of the contract (article 6.1(b) GDPR)
Generic personal data of the ticket holder/user	e) safety f) prohibited access to the stadium	Legitimate interest (Article 6.1(f) GDPR) Legal obligations (Article 6.1(c) GDPR) Legitimate interest (Article 6.1(f) GDPR)
Generic personal data Measures relating to the ticket holder/user	g) prohibited access to the stadium	Legitimate interest (Article 6.1(f) GDPR)
Health condition (disability) of the ticket holder/user	h) access to special rates	Consent (article 9.2(a) GDPR)
Personal and contact data of the ticket holder/user Generic personal data (name, surname) relating to Covid-19 green pass checks; Health condition (body temperature) of the	i) public health protection and COVID-19 spread prevention; access to the stadium.	Legal obligations (Article 6.1(c) GDPR) Public interest reasons (Article 9.2(g) GDPR)



ticket holder/user		
E-mail address of the ticket purchaser	j) Soft spamming	Legitimate interest (Article 6.1(f) GDPR)
E-mail address of the ticket purchaser	k) Commercial and marketing	Consent (Article 6.1(a) GDPR)

Data processing methods

The data will be processed in paper form or using electronic and/or digital tools and, in any case, according to the methods and tools suited to guaranteeing data security and confidentiality, 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 adopted to guarantee data protection, granting access only to persons authorised to process the data and specifically instructed by the Data Controller or Data Processors appointed by the Data Controller pursuant to Article 29 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:

- employees or collaborators of Juventus in their capacity as "authorised processors", within the scope of their duties and in compliance with instructions received;
- 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). For example, the service providers may include third parties who carry out maintenance on IT procedures and/or platforms, organisational and management consultants, stadium services, ticket office services, customer care services, parties that carry out technical or organisational duties such as providing press services, envelope filling, mailing, transport and sorting of communications using automated systems, such as email, fax, text or multimedia messages, or using traditional methods (e.g. standard mail) or by telephone with operators, digital marketing companies, consultants, etc.), professionals responsible for photo and/or video production, as well as companies engaged in the distribution/delivery to participants at one or more events organised or sponsored by Juventus F.C. S.p.A. and the related photographs and/or videos of one or more events. These parties will be appointed as **External Data Processors**. The complete list of Processors is available on request from Juventus by writing to the company's office address or email address: privacy@juventus.com;
- any entity (Public Authorities included) with access to the personal data pursuant to statutory or administrative measures. In this context, among the purposes referred to under letter f), it should be remembered that Italian Ministerial Decree of 15/08/2009 states that personal data can be made available to the police, also by electronic means, for the latter to ascertain the absence of conditions that could prohibit the issue of tickets to sporting events. Such data are retained only for the time strictly necessary for these checks to be carried out, as envisaged in the aforementioned ministerial decree;
- 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 is entrusted with the service of selling and issuing 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 ticket users in relation to its ticket assignment and issue activities, including checking any prohibited access or other bans pursuant to the purposes described under letters f) and g), as well as for other operational and administrative purposes described under letter d).

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.

A number of Data Processors appointed by the Club could, in Italy and abroad (EU and non-EU countries), use subsidiaries or associates 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 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.).

Duration

The personal data of the ticket user will be kept for the lengths of time indicated in Ministerial Decree of 06/06/2005 (or other period envisaged in legal or regulatory measures and/or provisions issued to deal with the Covid-19 epidemiological emergency).

The personal data of ticket purchasers and users, collected for administrative, operational or accounting purposes will be kept for 10 years from expiry of the contract.

If processed, the data relating to COVID-19 green passes and real-time body temperature readings will not be kept.

The ID document and proof of disability, requested for the sole purpose of checking identity and the satisfaction of requirements to claim the special rate, have to be shown to the access control personnel (duly authorised to process personal data) and will not be kept.

Video surveillance images, except in special circumstances requiring them to be retained for longer for club protection purposes, also in court, and in cases where a response must be made to a specific investigative inquiry on the part of judicial authorities or police, are deleted 7 days after the match to which they refer.

As for images captured as part of fan entertainment services, these will be kept for the duration of the sports season in which the photos were taken.

Data relating to measures adopted in relation to the Code of Conduct governing the transfer of match tickets will be stored for 10 years from collection in order to comply with obligations to assess previous conduct when determining the duration of any 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 are 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 are deleted 36 months at most from when the Data Subject ceases interaction with the Club.

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

Data Subjects' 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 intelligible communication of these data, their origin and the logic and purpose of their 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.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 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 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>.

¹These 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.