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INFORMATION REGARDING PERSONAL DATA COLLECTED AS PART OF THE JUVENTUS CARD

**PROGRAMME** 

PURPOSE, NATURE OF PROVISION AND LEGAL BASES

Juventus Football Club S.p.A., with registered office in Via Druento 175, Turin, in its capacity as Data Controller,

hereby confirms that the operations which entail the collection and processing of any information that may

concern an identified or unidentified individual provided during the purchase of a JUVENTUS CARD and/or

those that may be supplied thereafter, during the use of the services, including data relative to the purchased

services, shall only be processed for the following purposes:

a) contractual purposes: that is, to execute the contract and allow for the Juventus Card to be issued, as well

as to facilitate the management of the related services, in that the aforementioned constitute an integral part

of the contractual obligations. Data will also be used to send correspondence (including electronic

communications) containing information pertaining to the contractual relationship and the benefits arising

from it, or in order to fulfil specific requests. The data may also be used to purchase stadium tickets or to

transfer, free of charge, a ticket from one Juventus Card to another (e.g. name change). In the event that the

holder of the Juventus Card is appointed by a season ticket holder as a reserve to whom the tickets of the

individual season matches can be transferred, free of charge, his/her personal data will be processed on the

platform used by the season ticket holder for the purpose of transferring the ticket.

b) legal purposes: to comply with the obligations provided for by laws on ticket purchases and on the security

function of the Juventus Card (which is subject to the provisions set out in Article 8 of Italian Decree Law no.

8 dated 8 February 2007, converted by Italian Law no. 41 of 4 April 2007, and is issued in compliance with the

procedures of Italian Ministerial Decree of 15 August 2009);

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c) administrative purposes: common data will be processed for administrative and accounting purposes, including e-mail submission of commercial invoices by Juventus, where necessary, in order to execute purchases, issue and send the Juventus Card, or issue the security code for the ticket purchased and loaded onto the Juventus Card:

d) as regards identification documentation, this is requested in order to combat fraud and to comply with the legal obligations for purchasing stadium tickets and the procedure referred to in Italian Ministerial Decree of 15 August 2009.

e) common data and data relating to criminal or administrative proceedings that entail the enforcement of a ban on accessing the stadiums, if communicated to Juventus by the competent authorities, may be processed both for the purpose of issuing the Juventus Card and of cancelling it or preventing any tickets from being uploaded on it and/or from using the tickets. This also includes data on those who breach the Code Regulating the Sale of Access Tickets.

In the cases described above under points a), b), c), d) and e), personal data are necessary to pursue the aforementioned purposes; any refusal to provide the data or the provision of incomplete data may make it impossible for the company to provide the services in their entirety and to fulfil legal obligations. The legal bases of the processing are as follows: for the purposes specified under points a), b) and c) the legal basis is to fulfil a legal obligation or to execute a contract or pre-contractual measures requested by the Data Subject pursuant to article 6 letter b) of EU Regulation 2016/679, whereas for the purposes listed under points d) and e), the legal basis consists both of the need to fulfil a legal obligation and of the legitimate interest of the above-mentioned Company.

# **TYPE OF DATA PROCESSED**



Common personal data: data supplied for the purposes of issuing and sending the Juventus Card (name, surname, place/country and date of birth, address, e-mail and telephone number of the Holder or the parent or guardian in the case of a minor), or any other data necessary to verify the identity of the person, or information on the tickets purchased that must be uploaded to the card.

Data relating to proceedings: for the purposes of issuing the Juventus Card and ensuring access to the relevant services, and when purchasing stadium tickets, data relating to criminal or administrative proceedings, which entail the enforcement of a ban on accessing the 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).

## **DATA SOURCES**

Common personal data are collected from data subjects (and therefore directly supplied by them) or from the parent or guardian in case of minors under the age of 16, by filling in the form or through the online purchase procedure on the Site or App; for Juventus Official Fan Club members, the data are collected from the Juventus Official Fan Club to which the members belong.

The data relative to provisions may however be communicated to Juventus by the authorities in relation to the applicable regulations, for the purposes of prevention and repression of expression of violence linked to football matches.

#### METHOD OF DATA PROCESSING



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 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 by the data controller or processors appointed by the data controller.

Data may also be communicated via a radiofrequency microchip, with encrypted transmission of the personal data contained in the card (specifically, the saved numerical codes stored therein), which can be read by specialised systems which are authenticated via specific credentials at a variable distance (always less than 10 cm). Systems that are not fitted with specific credentials cannot detect/read the card and acquire identification data. This technology is applied in electronic ticketing systems, when the Juventus Card is used as a digital media device onto which stadium admission tickets are loaded.

### **DURATION OF PROCESSING**

Without prejudice to processing for administrative purposes - for which the retention time is 10 years from the expiry of the effects of the contract – and purposes of managing disputes and ensuring public safety or legal security, the personal data collected for contractual purposes will be stored for the duration of the contractual relationship.

Data processed for legal reasons shall be stored for the time required by relevant legislation.

The identity document requested for issuing the Juventus Card shall be temporarily stored until identity checks have been carried out.



Data relating to measures taken in relation to the Code Regulating the sale of tickets shall be stored for 10 years from collection in order to comply with the obligations of assessing previous conduct so as to determine the duration of any ban.

In all other cases the data not required to be stored to meet legal obligations or for the legitimate interest of the Data Controller will be deleted 24 months after the date on which the needs connected with the purposes specified herein have ceased to exist.

#### CATEGORIES OF PERSONS HAVING ACCESS TO THE DATA AND SCOPE OF DATA CIRCULATION

For the purposes listed above, the data collected may be made accessible or communicated:

- to employees or associates of Juventus' corporate functions in charge of achieving the aforementioned purposes, in their capacity of persons authorised to process data (or so-called "Processing Officers"), as part of their respective duties and in compliance with the instructions received. Those individuals must, in any case, comply with obligations of secrecy and confidentiality;
- to third parties performing outsourced activities on behalf of Juventus in the capacity of external parties to whom Juventus entrusts certain activities, or a part of them, or whose activity is connected with, instrumental to or supports that of Juventus, who process the data on the latter's behalf (such as, by way of example, hosting companies, project managers, programmers, system engineers, database administrators, IT services companies, parties running the ticketing and access control service, parties tasked by Juventus with back office activities in the process of verifying the data and customer care services; parties that carry out technical or organisational tasks, such as production and shipment of the Juventus Card, companies performing communication services via automated systems, such as e-mail, fax, SMS or MMS, or by traditional methods [e.g. paper mail]), or by phone with operator assistance, consulting companies, the Juventus Official



Fan Club for Juventus Official Fan Club Members who purchase the Juventus Card via the Official Fan Club to which they belong). These parties will be appointed as 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 includes) which may access to the personal data based on statutory and administrative provisions;
- to third-party companies that manage online payment platforms and operate as independent controllers;
- to any public and/or private subject, individuals and/or entities (legal, administrative and tax consultancy firms that operate in the capacity of autonomous Data Controllers (legal, administrative and tax consultancy firms, Judicial Authorities, Chambers of Commerce, Employment Authorities, etc.), if such disclosure is required or functional for the correct performance of the contractual obligations, and also of the statutory obligations;

Juventus stores the data in databases 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.

For Juventus Cards purchased by the Juventus Official Fan Club Member resident abroad, via the Official Fan Club, the paper forms are stored at the relevant Juventus Official Fan Club. In this case, the transfer of data beyond the European Economic Area, or to a territory that does not guarantee an adequate level of data protection recognised by the European Commission, will be subject to specific guarantees.



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 (for example, by adopting standard contractual clauses, binding company regulations, code of conduct, certifications, etc.).

#### DATA CONTROLLER

Juventus F.C. S.p.A., with registered office in Via Druento 175 – 10151 Turin, VAT no. 00470470014, which supplies the services covered by the contract, 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.mailto:privacy@juventus.com

### **DATA SUBJECT 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 request the



erasure, 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. 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. The data subject may also submit a complaint to the Data Protection Supervisory Authority in the forms and ways provided for by current legislation.

For further information and for details on how to exercise your rights, read the Privacy Policy at the following address: https://www.juventus.com/it/privacy.https://www.juventus.com/it/privacy