



## Information regarding personal data collected as part of the Juventus Card Programme

### Purpose, nature of data provided and legal basis

Juventus Football Club S.p.A., with registered office in Turin, Via Druento 175, 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 identifiable 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 and the participation of the data subject in 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);
- 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 Transfer of 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 that 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 Code Regulating 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.

Data relating to proceedings may be communicated to Juventus by the authorities in charge in application of current legislation, for the purpose of preventing and suppressing episodes of violence connected to football competitions.

#### **Method of personal 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 that the protection of the data is guaranteed, 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 Transfer 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, within the scope of their duties and in compliance with the instructions received. Said individuals are, nonetheless, subject to the 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 (e.g. hosting companies, project managers, programmers, system engineers and database administrators, parties running the ticketing service, parties tasked by Juventus with customer care functions; parties that carry out technical or organisational tasks, such as supplying communication printing, packing, sending, transportation and sorting services using automated systems such as e-mail, fax, sms or MMS, traditional methods (e.g. paper-based mail), or by phone with operator assistance, consulting companies, and marketing companies). 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](mailto:privacy@juventus.com);
- to any entity (Public Authorities included) which have access to the personal data based on statutory and administrative provisions;
- to any public and/or private subject, individuals and/or entities 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 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 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 (EU) Regulation 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 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. 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 of the Site at the following address: <https://www.juventus.com/it/privacy>.

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