



## **INFORMATION ON THE PROCESSING OF PERSONAL DATA OF HOLDERS OF FREE ACCESS TITLES / SERVICE PASSES**

Pursuant to article 13 Regulation (EU) 679/2016

### **Data Controller**

Juventus F.C. S.p.A., with legal office in Via Druento 175 – 10151 Turin, VAT no. 00470470014, which supplies the services which form the subject of this contract and organises the sporting event 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).

### **Purpose and nature of conferment**

Juventus Football Club S.p.A. (Juventus) declares, in its capacity as Data Controller, that the personal data provided for service accreditation and / or for the assignment of free access titles and the data captured after their access to the stadium, including the data on the tickets purchased and any images and sounds recorded inside the stadium, is processed for the following **purposes**:

- a) the generic personal data of the holder of the free access/service pass are processed for the issue of the entry ticket/admission pass on which controls may be carried out;
- b) the images of the holder of the free access/service pass are processed for the activities related with and instrumental to access to the stadium, including audio-visual recordings made for security reasons, to ascertain relevant conduct pursuant to the Code Regulating the Sale of Tickets to football events (known as the Code of Conduct) and for documenting and commenting on the sports events attended by data subjects;
- c) the generic personal data of the holder of the free access/service pass 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 pass;
- d) the generic personal data of the holder of the free access/service pass are processed for operational, administrative and accounting activities. Said purposes include services aimed at associating the general details of the user with each entry ticket, sending communications (including electronically) strictly related to the services;
- e) in order to issue the entry/ticket/admission pass, data relating to the holder of the free access/service pass relating to criminal or administrative provisions 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 Tickets (so-called Code of Conduct);
- f) if provided for in the orders and/or provisions of the law and/or regulations issued within the scope of the COVID-19 epidemiological emergency, the personal data and contact data of the holder of the free access/service pass may be processed and kept for up to 14 days from the event. Additionally, in order to permit access to the stadium, the personal data (name, surname) may be processed in order to check the authenticity, completeness and validity of the COVID-19 green certification and the data relating to health (like the body temperature) within the scope of checking the temperature of the person in real time [and the Covid-19 test results pursuant to the Guidelines for the organization of sporting events and competitions \(Linee Guida 6 agosto 2021\)](#). The legal basis that legitimises this processing is the implementation of anti-contagion safety protocols, in respect of existing legislation (article 6, letter c and article 9.2.g) Regulation (EU) 679/2016)

The personal data are required in order to pursue the above-mentioned purposes, therefore, denial 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:



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Via Druento 175 – 10151 Torino – Italia | [www.juventus.com](http://www.juventus.com)  
Contact Center 011.45.30.486  
Capitale Sociale 11.406.986,56 € interamente versato  
Registro Imprese, Codice Fiscale e Partita IVA 00470470014 - REA 394963





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 holder of the free access/service pass	a) sale and issue of entry ticket/admission pass	Performance of the contract (article 6.1, letter b, GDPR) Legal obligations (article 6.1, letter c, GDPR)
Images of the holder of the free access/service pass	b) safety  checking relevant conduct for the purpose of the "enjoyment" system (Code of Conduct)  documentation of the sporting event	Legal obligations (article 6.1, letter c, GDPR)  Legitimate interest (article 6.1, letter f, GDPR)
Generic personal data and ID document of the holder of the free access/service pass	c) provision of service (access to the stadium)	Performance of the contract (article 6.1, letter b, GDPR)
Generic personal data of the holder of the free access/service pass	d) administrative, operational and accounting	Performance of the contract (article 6.1, letter b, GDPR)
Administrative or judicial measures against holder of the free access/service pass	e) to prevent access to the stadium	Legal obligations (article 6.1, letter c, GDPR) Legitimate interest (article 6.1, letter f, GDPR)
Personal data and contact data of the holder of the free access/service pass Generic personal data (name, surname) relating to checking the COVID-19 green certificates; State of health (body temperature and Covid-19 test) of the holder of the free access/service pass	f) protection of public health and prevention of infection from COVID-19; access to the stadium.	Legal obligations (article 6.1, letter c, GDPR) Public interest reasons (article 9.2, letter g, GDPR)

#### 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 and specifically instructed by the Data controller or the Processors appointed by the Data controller pursuant to article 29 GDPR.

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

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

- a) employees or collaborators of Juventus in their capacity of authorised processors ("**parties authorised for processing**") within the scope of their duties and in compliance with the instructions received;





- b) third parties performing outsourced activities on behalf of Juventus in the capacity of its 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 suppliers may include third parties who carry out maintenance on procedures and/or computer platforms, organisational and management consultants, stadium services, ticket office services, 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, SMS or MMS 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 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);
- c) to any entity (Public Authorities included) which has access to the personal data based on statutory and administrative provisions. In this context, within the scope of the purposes pursuant to point a), it should be remembered that under Italian law (Ministerial Decree of 15/08/2009), personal data can be made available, including telematically, to the police for the latter to ascertain the absence of conditions posing an obstacle to the issue of tickets for access 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 legislation;
- d) to those public and/or private subject, natural and/or legal persons that operate in the capacity of **autonomous Data Controllers** (legal, administrative and tax consultancy firms, Judicial Authorities, etc.), if such disclosure is required or functional for the correct performance of the contractual obligations taken on, legal obligations and for legitimate interests.

More specifically, PG ITALIA, who was entrusted with the service of selling and issuing the tickets and admission passes, as Data Processor, has been appointed and authorised by Juventus to process the personal data of the holders of the free access/service pass in relation to the activities it carries out aimed at the assignment and issue of the entry ticket/admission pass, including checking any impediments pursuant to the purposes described under letter e), or for the other operational and administrative purposes described under letter d).

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 Economic Area, 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, codes of conduct, certifications, etc.).

#### Duration

The personal data of the holder of the free access/service pass associated with the entry ticket/admission pass shall be kept for the time-frames indicated in Ministerial Decree of 06/06/2005 (or for any other time-frame that may be provided for by the orders and/or legal provisions and/or regulations issued to deal with the COVID-19 epidemiological emergency).

The personal data of the holder of the free access/service pass, collected for administrative, operational or accounting purposes shall be kept for 10 years from expiry of the contract.

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

The ID document requested for the sole purpose of checking the identity, will only have to be shown to the entry checking personnel (duly authorised to process personal data) and will not be stored.

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

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.

The sound and video recordings captured in the stadium to present the sporting event to the public are kept as historical archives.





### 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.<sup>1</sup> 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, and to withdraw their consent if the processing is based on that. The data subject may also submit a complaint to the Data Protection Supervisory Authority in the forms and ways provided for by current legislation. The procedures to follow to exercise those 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 set forth and governed by articles 15-22 of the Regulations. The deletion of data concerns data processed in breach of the law or in case of the revocation of consent and when there are no other legal grounds for the relative 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 in cases the Data Controller has legitimate and prevalent reasons or when such objections would compromise the Data Controller's right to legal defence.

