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PRIVACY & COOKIES POLICY

Information pursuant to Articles 13 and 14 EU Reg. 2016/679 (Rev.5.0 Agg.13/03/2025)

This page describes how the website manages the processing of Personal Data of users who view the website or use the services it offers.

This page explains the processing of Personal Data carried out in connection with the services made available via the web via:

- > the <https://www.acffiorentina.com/> website
- > the Fiorentina Official App

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DATA CONTROLLER (who decides why, how and by whom data is processed)

After viewing this website and using the services offered by it, data relating to identified or identifiable persons may be processed.

In addition to browsing data, information may, for instance, be collected:

- > in the event of a request for contact;
- > in the event of the use of other services through the Platforms made accessible by the website or the InViola App, which is discussed in the relevant paragraph of this document;
- > through the use of cookies or other technologies as set out below.

The data controller is ACF FIORENTINA S.r.l.: with registered office in via Pian Di Ripoli n.5 - 50012 - Bagno a Ripoli (FI),

The data Controller has appointed a Data Protection Officer whose role is to monitor compliance with the legislation on the protection of Personal Data, whose contact details are: rpd@acfflorentina.it.

DATA SUBJECTS' RIGHTS

With reference to the processing referred to in this document, the data subjects (users of the website) have the right to:

- > request from the Data Controller access to and rectification or erasure of Personal Data or restriction of the processing of Personal Data concerning them and to object to its processing;
- > if the processing is carried out by automated (IT) means and on the basis of their consent, to receive in a structured, commonly used and machine-readable format the Personal Data concerning them and/or to ensure it is sent directly to another Data Controller, if technically feasible;
- > withdraw their consent at any time (without prejudice to the lawfulness of the processing based on the consent prior to the withdrawal), to processing carried out on that basis;
- > lodge a complaint with a supervisory authority. Garante per la protezione dei dati personali - Piazza Venezia n. 11 00187 ROMA - Telephone switchboard: (+39) 06.696771 - E-mail: protocollo@gpdp.it - certified mail protocollo@pec.gpdp.it.

More information at the end of this policy.

To assert their rights, the Data Subject may contact ACF FIORENTINA S.r.l. via the email address infoprivacy@acfflorentina.it or by sending a registered letter to the address specified above, specifying the nature of the request or the problem highlighted and keeping in mind that it will not be possible to respond to requests received if there is no certainty regarding the identity of the applicant.

BROWSING DATA - data processed in connection with a visit to the website

The computer systems and software procedures used to operate this website acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified data subjects, but it is information that by its very nature could, through processing and association with data held by third parties, enable users to be identified.

This category of data includes, for example, the IP addresses or domain names of the computers used by users who connect to the website, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's IT environment, such as the type and version of the browser, the types and versions of browser plug-ins, the mobile device identifier (IDFA or AndroidID) and other parameters relating to your operating system and IT environment.

This data, in the absence of specific consent to processing for further purposes, is used for the sole purpose of obtaining anonymous statistical information on the use of the website and to check its correct functioning.

The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the website and in this case only, specific procedures may be activated to identify the author.

The legal basis for the processing of this data is the legitimate interest of the data controller in protecting data security, proper functioning of the website and improvement of service standards.

Personal data is processed by automated means for the time strictly necessary to achieve the purposes for which it was collected. Processing relating to the web services of this website are handled by personnel appointed by the Data Controller as well as by external subjects, appointed as data processors (ART. 28 REG. EU 2016/679), which is entrusted with the technical management and maintenance of the website and its IT systems. Specific security measures are observed to prevent the loss of Data, unlawful or incorrect use and unauthorised access.

No data from the web is disseminated.

The Personal Data provided by users who send requests for information material (*newsletters*, answers to questions, etc.) are used only for the purpose of performing the service or provision requested and are communicated to third parties only if necessary for that purpose.

DATA PROVIDED VOLUNTARILY BY THE USER

Apart from what is specified above, the user is free to provide the Personal Data requested in the course of browsing to request information material or other communications. Failure to provide them may result in the impossibility of obtaining what has been requested.

When the user visits a part of the Website or enables a functionality made available by the Fiorentina Official App that involves the collection of Personal Data, a link to this information document is offered to them and they are asked to confirm that they have read it and, if necessary, to give their consent.

The optional, explicit and voluntary sending of electronic mail to the addresses indicated on this website or reachable through the App entails the subsequent acquisition of the sender's address, which is necessary to reply to requests, as well as any other Personal Data included in the message which, unless otherwise duly communicated, will be kept for the time necessary to fulfil the requests.

Below are specific information notices referring to pages set up for particular services on request or through which further Personal Data may be acquired.

PROCESSING RESULTING FROM A REQUEST FOR CONTACT (CONTACT AREA) OR REGISTRATION

- ⇒ The Personal Data voluntarily provided by the Data Subject via the contact area, or the email addresses made available on the platform, is processed using predominantly automated tools to:
 - ↳ ensure a certain and timely response and meet the data subject's requests (*legal basis for processing: legitimate interest and consent of the Data Subject in the case of 'special' Personal Data*);
 - ↳ fulfil obligations deriving from EU laws, rules and regulations; fulfilling provisions issued by the Judicial Authority, (*legal basis for processing: coinciding with the purpose*);
 - ↳ feed the system of public knowledge acquisition through statistical analysis, carried out by means of anonymised and aggregated data, useful for the verification, improvement and therefore design of an increasingly efficient service, (*legal basis of the processing: legitimate interest of the owner coinciding with the purpose*).
- ⇒ The contact details and email addresses provided may be used to send courtesy communications and/or information material relating to the holder's activities **only where the following legal bases apply**:
 - ↳ *legitimate interest in processing Personal Data for direct marketing purposes considering the relationship with the Data Subject [Art. 6 c.1 lett. f EU Reg. 2016/679] where the requested contact is related to or involves the establishment of an ongoing relationship with the data controller*
 - ↳ *consent of the Data Subject [Art. 6 c. 1 lett. a EU Reg. 2016/679], which, in the event of its own interest, the Data Controller will request in the course of contacts aimed at fulfilling the Data Subject's requests.*
- ⇒ Data may be processed by promotion, communication and public relations staff, computer system maintenance staff whose task it is to ensure the functionality of the systems, data security, other staff appointed within the limits of the tasks assigned to them and as provided for by company procedures, and other persons who provide services for purposes auxiliary to the fulfilment of the data subject's requests, also within the limits strictly necessary to carry out their tasks.
- ⇒ The data may be communicated or made available:
 - to persons who can access the data by virtue of a provision of law, regulation or EU legislation, within the limits provided for by these rules,
 - other associated companies (subsidiaries - parent companies) always for current '*administrative accounting purposes*' connected with the fulfilment of the data subject's requests
 - other entities that provide services for purposes related to the fulfilment of the Data Subject's requests, to the extent strictly necessary to perform their tasks - business partners, whose cooperation is necessary for the provision of the requested services. The Business Partners will act as autonomous data controllers and will comply with their respective privacy policies, which will be made available by them.

- ⇒ Personal data will also be transferred to entities located outside the European Union to the country in which the Data Subject resides or is located only if necessary to fulfil his or her requests and in accordance with applicable law.

When filling in the forms, fields that must be filled out are indicated with an asterisk; without the required data, it will not be possible to comply with the interested party's request.

If, at the time of the contact request, the Data Subject should communicate special categories of data (such as: Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as processing genetic data, biometric data intended to uniquely identify a natural person, data relating to health or sex life or the sexual orientation of the person), specific consent to processing may be requested, in the absence of which it may be impossible to proceed with the requests of the Data Subject.

REGISTRATION PROCEDURE FOR THE INVIOLE AREA

On the website, as well as on the App, you can register in the InViola area.

Registration confirms, to all intents and purposes, participation in the InViola program and allows access to your personal area where the Data Subject can:

- > verify and update their data;
- > change their choices on consents given to ACF FIORENTINA;
- > check the number of accumulated InViola points;
- > obtain all services and benefits related to the InViola Card, if they do not already have them;

for this reason, registration follows two different procedures depending on whether or not the person concerned is already in possession of the InViola Card as follows:

1. If the user already has an InViola Card, they will simply need to enter the number to complete the procedure for accessing their reserved area, which was created when the InViola Card was issued;
2. if the user is NOT already an InViola Card holder, registration is equivalent to applying for the InViola Card itself and requires mandatory acceptance of the [InViola Card Rules](#) and the [sweepstakes Rules](#).

For the user's protection, the registration process compulsorily entails the entry of a confirmation code that will be sent to the email address and by SMS to the mobile phone number communicated, which will be the same as the one used for the password recovery procedure. For this reason, it is necessary for the user's own protection that they enter contact details on the forms that are exclusively available to them (for example, not providing company emails).

Some important notices:

- > Unless expressly delegated, the applicable legal provisions, about privacy, do not allow third parties to fill in fields or send information in place of the person who wishes to register.
- > Again, please remember to enter contact details that are only available to the person registering (for example, do not enter company emails) because ACF FIORENTINA may send communications addressed exclusively to the holder of the registration/InViola Card, which may even contain their personal data.
- > Please note the User will be able to use their chosen password to access their data and carry out operations that may involve an economic value, so a suitably secure password should be chosen (it should not contain information that could be easily linked to a User, should contain special characters, numbers, punctuation and should not be too short (it cannot be less than 8-10 characters) and it should be kept safe. It should also be changed regularly or whenever there is the suspicion that confidentiality has been compromised.

Fiorentina Official App

The Fiorentina Official App is to all intents and purposes an interface that allows the user to:

- > obtain information about ACF Fiorentina,
 - > subscribe to the newsletter;
 - > use all the services and access all the content offered by the website;
 - > register for InViola in order to:
 - access all services related to the InViola Card;
 - participate in all the initiatives of our loyalty programmes, prize games, points collection, etc;
- for this reason, registration requires acceptance of specific regulations.

The Fiorentina Official App does not acquire any information from the user's terminal unless instructed to do so by the User. To allow the App to access or send any content (any type of file external to the app), always and only upon command of the User, confirmation is requested regarding the possibility for the App to access such content; in

this regard, note that this request will appear only once the first time a service is activated that involves access to content or a functionality on the device; if the user wishes to change their choice, they can do so through the settings of the device itself.

E-SHOP AREA

The link corresponding to the E-SHOP area refers to the website <http://www.fiorentinastore.com>, independently managed by FANATICS Italy S.r.l. with head office in Via Magistretti 10, 10128, Milan - the only company entrusted with the online sale of official ACF FIORENTINA products.

Note in any case that the data given by the user to FANATICS Italy S.r.l. on the website managed by it at the time of the purchase request will also be acquired by ACF FIORENTINA and will be processed as indicated in the information made available to the public and according to the consents given by the Data Subject.

PURCHASING PROCEDURE - TICKETS

To offer the best service with the highest safety standards, the management of the service has been entirely entrusted to a company specialized in the sector, with proven experience and reliability, appointed as Responsible pursuant to art. 28 REG. EU 2016/679.

The procedure for purchasing tickets refers to the domain "Ticket.acffiorentina.com", owned by ACF Fiorentina S.r.l. but managed entirely by VIVATICKET S.p.A. - Single member company - Via Antonio Canova 16/20 40138 Bologna - <https://www.vivaticket.com/it> - as an interface to allow the purchase on its web platform by exploiting the authentication made by the user by logging-in to the website www.acffiorentina.com.

STORING THE DATA

The data communicated, unless otherwise indicated by the Data Subject or further requirements duly communicated, will be kept for the time necessary to fulfil the Data Subject's requests and comply with legal regulations.

If the Data Subject has a contractual relationship with the Data Controller or is registered in the InViola programme, the data will be retained, if relevant, for the duration of the contract or registration, after which data retention will be continued only if compulsory by law and in accordance with the rules on the retention of administrative documents or as indicated in the information notice provided at the time the contractual relationship was established and at the time of registration.

The contact details for which consent has been given for the sending of communications of a commercial nature will be kept for up to 12 months following the last sending of communications by ACF FIORENTINA or the revocation of consent by the person concerned.

COOKIE POLICY

To offer due accuracy, the service provided by lubenda is activated which ensures the monitoring of cookies and generates and constantly updates the cookie policy made available upon access to the site to which you should refer for detailed information.

In any case, the Legal Bases of the treatments that originate with the use of cookies are:

- > for technical cookies (necessary for the proper functioning of the site and to allow navigation): the legitimate interest of the owner coinciding with the purpose of the cookies;
- > for profiling cookies: the consent of the user manifested in the manner described in the aforementioned provision of the Guarantor, i.e., continuing to navigate after having certainly read the notice displayed on the banner that appears as soon as one lands for the first time on the site.

The Legal Bases are the conditions provided by the EU Regulation 2016/679 that make the purpose of the processing and the processing itself lawful.



COOKIES – FURTHER INFORMATION

What are cookies and how they work

Cookies are small text files that websites visited by a user send to their terminal. These files are saved and stored in the folders of the user's browser and then re-sent to the same websites on the next visit.

Through cookies, the servers receive information that is re-read and updated every time the user returns to the website.

Cookies contain the following information:

- indication of the server or domain from which they were generated;
- their duration (or expiry date);
- a unique identification code;
- a unique value.

In any case, cookies cannot cause damage to the user's computer.

What are cookies?

The purpose of cookies is to improve the viewing of the website and improve the browsing experience. In addition, they provide the website operator with information, most often aggregated and anonymous information about the users' browsing in order to obtain statistical data on the use of the website.

In addition, some cookies collect and store information on the user's device about what the user has done on websites; this information may be used:

- > to recognise the user (or, rather, the device used by the user) by suggesting the settings previously requested/chosen by the user during subsequent visits;
- > to analyse the preferences expressed by the user during browsing by creating a profile used essentially to display or send customised commercial promotion messages, i.e. those that are in line with the interests inferred from the user's browsing.

Types of cookies

Cookies can be divided into the following categories: *Technical cookies and profiling cookies.*

- > **TECHNICAL' and functionality COOKIES:** *Technical cookies are those used for the sole purpose of "carrying out the transmission of a communication on an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide such service" (see art. 122, paragraph 1, of the Code).*

These allow the website to function optimally, but the user can decide to block them by changing the settings of the browser used. Deactivating these cookies may prevent access to certain features of the website.

Within the scope of technical cookies, a distinction can be made:

- **Browsing cookies**
These are required to browse within the website using all of its functions (such as staying logged in and access to restricted areas) and do not collect information for profiling or commercial purposes. Without these cookies, it would not be possible to provide the services requested.
- **Functionality cookies**
These allow the user to browse according to a set of selected criteria (e.g. the language of the website), thereby facilitating browsing. The information collected via these cookies is anonymous.

The installation of technical cookies does not require the prior consent of users, although the obligation to provide this information remains. The acquisition and processing of data resulting from the use of technical cookies is necessary for the correct consultation of the website. If the user objects, they will not be able to see the website correctly and in full.

The legal basis for the use of technical cookies remains the legitimate interest of the Data Controller consisting of the proper functioning of the website and improvement of the services rendered.

Cookie Analytics

These are considered to constitute technical cookies when they are used directly by the website operator to collect information in aggregate form on the number of users and how they visit the website. Used to optimise management. The information collected by these cookies does not allow the user to be identified.

> PROFILING COOKIES

As mentioned above, these cookies allow us to acquire information relating to the preferences and ways in which the user interacts with the website and are used to assign the user (often the terminal used by the user) a profile to optimise the effectiveness and usability of the website, also by personalising the promotional/advertising messages displayed to the individual user.

These cookies may be installed on users' terminals only when they have been previously and adequately informed and have given their consent, which, as provided for by the provision mentioned in the introduction, may also be manifested simply by the user continuing to browse after reading the notice displayed the first time the website is accessed.

The legal basis for the use of profiling cookies is the consent of the person concerned (user of the device used for browsing) given in accordance with the methods provided for in the general provision of the Garante per la protezione dei dati personali Identification of simplified procedures for the information and acquisition of consent for the use of cookies" of 8 May 2014 [<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/3118884>].

THIRD-PARTY COOKIES

While browsing a website, cookies from other websites managed by third parties may be installed in the user's browser folders.

This happens because there may be elements on the site (such as, for example, services, functions, images, maps, sounds, specific links to web pages of other domains) that reside on servers other than the one on which the page the user is visiting is located. When the user interacts with or selects these elements, the site may store cookies in the folders of the user's browser that are set directly by the managers of these elements (other than the Data Controller mentioned in this privacy policy), who can thus obtain information about the fact that you have visited the Site and how you have interacted with it.

In this case:

- > ACF Fiorentina acts only as a technical intermediary between the user and the managers of the elements with which he has interacted;
- > the owners of the processing carried out through cookies are the respective managers;
- > the information published by the managers and made available through links in the cookie policy generated by the service provided by lubenda must be referred to and taken into account.

To disable third-party cookies, please refer to the instructions in the previous points.

For more information, please visit the following website: www.youronlinechoices.com/it/.

If the User decides not to give his/her consent to the storage of third-party cookies, the User may only use those functions of the Website that do not require the storage of these cookies.

With regard to the ownership of the processing carried out through these third-party cookies, please refer to the respective information and cookie policies that can be reached via the links proposed above and in the following paragraphs.

DISABLING AND DELETING COOKIES

The user's privacy is essentially guaranteed by the fact that they can AT ANY TIME:

- > **configure their browser to accept all cookies, reject them all or receive a warning when one is sent,**
- > **delete one, some or all cookies.**

Each browser has its own specific settings, so remember to check the "Help" section of the browser used for more information on how to change your preferences.

Most browsers are initially set to accept cookies automatically. In the case of different devices (for example, computers, smartphones, tablets, etc.), the User must ensure that the browser settings of each device are configured to reflect their preferences regarding cookies.

Below are some links to the online documentation for the main browsers:

- Edge: <https://support.microsoft.com/it-it/windows/gestire-i-cookie-in-microsoft-edge-visualizzare-consentire-bloccare-eliminare-e-usare-168dab11-0753-043d-7c16-ed5947fc64d>
- Internet Explorer: <http://windows.microsoft.com/it-it/internet-explorer/ie-security-privacy-settings#ie=ie-11>



- Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=it>
- Safari iOS (iPhone, iPad, iPod touch): <http://support.apple.com/kb/HT1677?viewlocale=it>

Disabling COOKIES ON MOBILE DEVICES

Just as with browsers on computers, browsers on mobile devices allow you to change the privacy configuration or settings to disable or delete cookies.

If you wish to change your privacy settings, please follow the instructions provided by the browser developer for your mobile device.

Below are valid links for some browsers:

IOS <https://goo.gl/fG1K8t>
Chrome Mobile <https://goo.gl/f0XME>
Opera Mobile <http://goo.gl/Nzr8s7>

USER RIGHTS - MORE INFORMATION

Right of access

The interested party has the right to obtain from the data controller confirmation that personal data concerning him or her is or is not being processed and, where that is the case, to obtain access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients in third countries or international organizations and, in that case, the existence of adequate guarantees;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of an automated decision-making process, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such processing for the data subject.

Right of rectification

The interested party has the right to obtain from the data controller the correction of inaccurate personal data concerning him/her without undue delay.

Right to erasure

The interested party has the right to obtain from the data controller the deletion of personal data concerning him/her without undue delay and the data controller is obliged to delete personal data without undue delay if one of the following reasons exists:

- a) personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
- b) the interested party revokes the consent on which the processing is based and there is no other legal basis for the processing;
- c) the interested party opposes the processing, and there is no prevailing legitimate reason to proceed with the processing;
- d) the personal data has been processed unlawfully;
- e) the personal data must be erased for compliance with a legal obligation in European Union law or the law of the Member State to which the data controller is subject;

Rights to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the

restriction of their use instead;

c) although the data controller no longer needs the personal data for processing purposes, they are required by the data subject for the establishment, exercise or defense of legal claims;

d) the data subject has objected to the processing, pending the verification whether the legitimate grounds of the data controller override those of the data subject.

Right to object

The data subject has the right to object at any time to the processing of personal data concerning him/her for direct marketing purposes, including profiling to the extent that it is related to such direct marketing.

Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the processing is based on consent or on a contract; and
- b) the processing is carried out by automated means.

In exercising his or her rights regarding data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Some Definitions

Personal data: Any information relating to an identified or identifiable natural person

“Special” Personal Data REQUIRES MORE PROTECTION AND CAREFUL ATTENTION, such data involves Personal Data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to health or sexual life or the sexual orientation of the person (art. 9 of EU Reg. 2016/679)

Processing: any operation or set of operations, performed by any means or format and applied to Personal Data or sets of Personal Data, (such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, **communication by transmission, dissemination or any other form of making available**, comparison or interconnection, limitation, erasure or destruction)

Data Subject: Natural person to whom the Personal Data relates;

‘Controller’: the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of Personal Data

Data Processor (named from art. 28 Reg. EU 2016/679): a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller

Legal basis of processing: the legal principle based on which the processing of Personal Data described can be carried out, in many cases coinciding with the stated purpose.