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INFORMATION NOTICE provided to data subjects applying for an InViola Card and participating in related prize competitions or promotional initiatives - (Art. 12-13-14 EU Reg 2016/679)

IN SUMMARY,

some information considered to be of most interest, not excluding the reading of the full information notice

Personal data provided by the data subject and data related to the use of the InViola card and participation in the initiatives promoted for InViola members according to the relevant regulations will be processed. The disclosure and updating of the data requested at the time of or following the registration is carried out on a voluntarily basis; the data in the absence of which it will not be possible to issue the InViola Card, to participate in the prize competitions and to receive the relative prizes will be indicated. The purposes of processing will always be related to the proper administrative and operational management of the InViola programme, prize competitions and initiatives reserved for InViola members.

The data will also be processed:

- ↪ unless otherwise specified by the data subject, to send information and advertising related to the InViola world by e-mail;
- ↪ with the consent of the data subject, to proactively identify interests and needs, in order to send offers and communications of interest and certainly beneficial to the recipient.

An account will be created at <https://www.acfflorentina.com> which will allow the data subject to

- ↪ edit/update and verify your profile at any time;
- ↪ register for new initiatives/events of their interest more easily and enjoying the priority offered to registered users;
- ↪ take advantage of additional content and services;
- ↪ make online purchases in the context of prize competitions.

Personal data will only be retained for the time allowed/imposed by the current legislation in force for the specific purpose for which the data are processed; more specifically:

- ↪ profiling data, if allowed by the data subject under the InViola programme, and data processed for commercial purposes will be retained for 12 months after the last contact/sent by the data subject or until the data subject's consent is withdrawn or otherwise indicated;
- ↪ account data will be retained until it is erased by the data subject as defined in the InViola Card Rules.

The data may be disclosed 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;
- ↪ Partners/Affiliates who join and participate in the InViola programme's prize competitions and initiatives;
- ↪ other Persons (companies/professionals), whether or not connected to the Data Controller, who collaborate in the management of operations and the granting of prizes, or who perform auxiliary activities for the purposes stated above, to the extent strictly necessary to carry out the tasks entrusted to them, such as: management of information systems, financial services.

The Data Controller in question is ACF Fiorentina S.r.l., better identified at the foot of the page.

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

The data subject may exercise its rights by e-mail to infoprivacy@acfflorentina.it or by sending a registered letter to the above-mentioned address, or by calling + 055571259 bearing in mind that it will not be possible to respond to requests received by telephone unless it is possible to ascertain the applicant's identity.

FULL INFORMATION NOTICE

1. WHICH DATA ARE PROCESSED

- ↪ data provided by the data subject (e.g. the supporter who requests a the InViola Card, hereinafter always referred to as the “Data Subject”) directly or through parties authorised by them, in relation to the request made and therefore not listed here which may also include “special” categories of personal data;
 - ↪ data relating to events organised by the promoter of prize competitions related to the InViola Card that the Data Subject intends to attend or has attended using the InViola Card;
 - ↪ data on participation in loyalty initiatives and programmes promoted by ACF Fiorentina;
 - ↪ other data connected with the use of the InViola Card;
 - ↪ data on points and prizes chosen in prize competitions;
 - ↪ data relating to purchases made using the InViola Card, with the exclusion of the exact identification of the product/service purchased, unless it is unavoidably detectable from the activity carried out by the partner (affiliated entity/shop at which the purchase is made) or from other elements (e.g. value of the purchase, etc.)
- and, in connection with the InViola Premium Card:
- ↪ possession or non-possession of the necessary requisites for obtaining the “Tessera del tifoso” (outcome of requests for clearance to the Public Safety Authority, notices or bans, other measures communicated by the Public Safety Authority, etc.)

Applicable regulations provide for special protection for data relating to criminal convictions and offences and/or special categories of personal data, such as: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. With regard to this point, particular attention is paid to acquiring only the data and to carrying out only the processing necessary to meet the requests of the data subjects and only if relevant and necessary in relation to the purposes set out below by requesting, where no other legal basis is applicable, specific consent.

2. ORIGIN OF DATA

Collection and updating of personal data may take place:

- ↪ through the Data Subject or, if a minor, also through the person exercising parental responsibility (parents or guardians or persons delegated by them);
- ↪ through intermediaries authorised by the Data Subject (relative, companion, institution, company, ticketing agency, association, other);
- ↪ from sources freely accessible to anyone;
- ↪ by the Public Safety Authority or Police Forces for all matters relating to public safety regulations applicable to the events.

3. WHY DATA ARE PROCESSED - purpose of processing and related legal basis

Personal data will be processed for the following purposes, for each of which the “legal basis” that makes it possible is indicated in brackets [the “legal bases” are the conditions that make a purpose lawful, as set forth in Articles 6 and 9 of EU Reg. 2016/679]:

- a) purposes related to the proper administrative and operational management of the prize competitions that the Data Subjects decide to join; allow the Interested Parties to access the initiatives promoted by ACF FIORENTINA S.r.l., related to the InViola loyalty program. For these purposes, data relating to the direct identification of the Data Subject are required; failure to provide such data implies the impossibility of adhering to the initiatives linked

- to the InViola loyalty program. In addition, some initiatives may not be accessible to underage subjects except with the consent of those exercising parental responsibility [legal basis: legitimate interest consisting in the efficient organisation of activities Article 6, para. 1 lett. f EU Reg. 2016/679 - performance of a contract and compliance with a legal obligation - Article 6, para. 1 lett. b-c- EU Reg. 2016/679];
- b) fulfilment of obligations provided by laws, a regulation or EU legislation with particular regard to Ministerial Decree of Interior Ministry 6/6/2005, Law 4/4/2007 n. 41 and in general to all to the to the legislation on the “nominativeness” of admission tickets to sports facilities; fulfil contractual and accounting and tax obligations [legal basis: performance of a contract and compliance with a legal obligation- Article 6, para. 1 lett. b-c- Reg. UE 2016/679];
- c) fulfilment of provisions issued by the Public Safety Authority, the Judicial Authority and Public Authorities that have this power, [legal basis: compliance with a legal obligation - Article 6, para. 1 lett. c- EU Reg. 2016/679];
- d) satisfy the Data Subject's requests by allowing access to multimedia content reserved for InViola members [legal basis: Data Subject's legitimate interest, which is subject of the request Article 6, para. 1 lett. ff];
- e) customer registry management, address books and internal statistical calculations, - Statistical analyses performed only by aggregating previously anonymised data [legal basis: legitimate interest consisting in the efficient organisation of activities Article 6, para. 1 lett. ff];
- f) possibly protection of a legitimate interest, asserting or defending a right [legal basis: consistent with the purpose of the data processing Article 6, para. 1 lett. f - Article 9 par. 2 lett. f EU Reg. 2016/679];

3.1 Communication and Direct Marketing. [legal basis: legitimate interest in processing personal data for direct marketing purposes always taking into account the reasonable expectations of the Data Subject based on their relationship with the Controller - Article 6, para. 1 lett. f EU Reg. 2016/679 - Legislative Decree 196/2003 Article 130 para. 4 - Data Subject's consent]

As also indicated on the *Information notice provided to the public pursuant to Articles 13 and 14 EU Reg. 2016/679*, unless otherwise communicated by the data subject, the e-mail address provided by them in the context of the purchase will be used for sending courtesy communications and/or information material/offers relating to products and services similar or related to the subject of the purchase itself. Having said this, the Data Subject's consent is requested in order to be able to use in any case also the other contact details provided by them (telephone, postal, etc.), for commercial purposes, for direct marketing activities, for promotional activities, for sending information and advertising material, direct sales, market research, for invitations to events, offers, individual or personalised advertising; this also by means of operator calls, e-mail, SMS, fax, MMS and other communication platforms and channels, such as whatsapp, Skype, etc.

The provision of data and consent for this purpose shall be on a voluntarily basis. In their absence, however, participation in the loyalty programme will not be precluded, but the Data Subject's ability to receive informative/advertising material and communications deemed of interest to them or relating to opportunities reserved for InViola members may be limited. Even if consent has been given, the Data Subject may object to this processing at any time

Our aim is to offer proposals that are of real interest and to engage in targeted communications and campaigns or particularly advantageous alerts that are often limited in time and/or quantity; for these reasons, it is necessary to reserve the possibility of choosing the most effective and suitable communication channel for each circumstance, bearing in mind that, in addition to the rights provided for by law, the Data Subject's freedom of choice is in any case guaranteed by the obvious possibility of withholding consent and providing or not providing the contact details requested optionally.

3.2 Profiling: we want to know our fan, their interests and needs in order to best assist them - [legal basis: Data Subject's consent - Article 6, para. 1 lett. a-f EU Reg. 2016/679]

With the Data Subject's consent, the data referred to in item 1 may be used and analysed to detect habits, interests and consume intentions, and to generate profiles that will enable us to proactively identify interests and needs, also by correlation with other data acquired by

- ↳ interaction of the Data Subject with ACF FIorentINA's internet platforms, use of the APP, purchases made on the site <https://www.fiorentinastore.com/it/>,
- ↳ social profiles made accessible by the Data Subject.

This activity will allow us to send offers and communications that will be of interest and certainly beneficial to the recipient.

Consent for this activity is of course optional, and failure to provide it does not preclude participation in the loyalty programme.

3.3 In summary, the processing referred to in this information notice may be carried out insofar as it is necessary:

- ↳ insofar as it is necessary to fulfil obligations arising from a contract to which the Data Subject is party, and related legal obligations
- ↳ insofar as it is necessary for the pursuit of a legitimate interest of the Controller or the Data Subject,
- ↳ in so far as it is as necessary to assert or defend a legal claim or to assess whether there is a right that can usefully be protected in court;
- ↳ upon the Data Subject giving their consent, (in particular in relation to the processing of certain special categories of personal data and the use of contact details other than the e-mail address provided upon conclusion of the contract for commercial and advertising communications referred to in item 3.1, and in relation to profiling activities referred to in item 3.2 above).

4. HOW ARE DATA PROCESSED Processing methods

In relation to the above-mentioned purposes, the processing of personal data may take place using paper, computer and telematic tools and will include all the operations or set of operations necessary to achieve the purposes applicable from time to time; while always guaranteeing absolute confidentiality, relevance and not exceeding the purposes described above.

4.1 CREATING AN ACCOUNT

The e-mail address provided by the Data Subject when filling in the CARD REQUEST FORM or the mobile phone number from which the application is made through the InViola APP, will be used to create a personal account in the name of the Data Subject for access to his or her own reserved area, which can be reached from the website <https://www.acffiorentina.com>.

Through the account it will be possible to:

- edit/update and verify your profile at any time;
- register for new initiatives/events of their interest more easily and enjoying the priority offered to registered users;
- take advantage of additional content and services.

5. RETENTION PERIOD

Personal data, without prejudice to the provisions of the rules on the retention of administrative documents (which provide for a retention period of 10 years) will be retained only for the time allowed/imposed by the legislation in force applicable to the specific purpose for which the data are processed; more specifically

- ↳ profiling data, if allowed by the data subject under the InViola programme, and data processed for commercial purposes (e-mail addresses and other contact details) will be retained for 12 months after the last contact/sent by the data subject or until the data subject's consent is withdrawn or otherwise indicated;
- ↳ account data will be retained until it is erased by the data subject as defined in the InViola Card Regulation after which they will be anonymised and used for statistical purposes.

6. BY WHOM THEY MAY BE PROCESSED - managers and appointees

For the same purposes, the data may be processed by the following categories of appointees and/or managers:

- ↪ staff involved in the management of prize competitions (company executives and management, communication and marketing staff, administrative staff to manage administrative issues, etc.);
- ↪ personnel in charge of the operation and maintenance of computer systems who are responsible for ensuring the functionality of the systems, data security and backup operations;
- ↪ external Company appointed as data processor pursuant to Article 28 EU Reg. 2016/679, which provides and manages the IT platform used for the prize competitions related thereto;
- ↪ Persons (companies/professionals), whether or not connected to the Data Controller, who collaborate, in their capacity as Data Processors (art. 28 EU Reg. 2016/79), in the management of prize competitions and the granting of prizes, or who perform auxiliary activities for the purposes stated above, to the extent strictly necessary to carry out the tasks entrusted to them, such as: management of information systems, financial services.

It is understood that the above-mentioned persons are authorised to use the data to the extent actually required to carry out their functions.

7. TO WHOM THEY MAY BE DISCLOSED - scope of disclosure -

Personal data relating to the processing in question may be disclosed to:

- ↪ Affiliated companies (parent companies, subsidiaries, companies subject to the same control), for ordinary administrative-accounting purposes;
- ↪ 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;
- ↪ limited to accounting and tax data to banks, credit institutions, data processing companies and credit card issuing companies, for activities strictly related to operations and management;
- ↪ persons indicated by the Data Subject or by a person acting on his or her behalf;
- ↪ Partners/Affiliates who join and participate in the InViola programme's prize competitions and initiatives;
- ↪ other Persons (companies/professionals), whether or not connected to the Data Controller, who collaborate in the management of operations and the granting of prizes, or who perform ancillary activities for the purposes stated above, to the extent strictly necessary to carry out the tasks entrusted to them, such as: management of information systems, financial services.

Of course, all disclosures are limited to the data necessary for the recipient entity/department (which will be the autonomous controller for all consequent processing) for the performance of its duties and to achieve the legitimate purposes connected with the communication itself, always in compliance with the above purposes.

7.1 TRANSFER ABROAD.

Personal data will be transferred to entities located outside the European Union to the country in which the Data Subject resides or is located only if the conditions of legitimacy referred to above are met and in compliance with the applicable legislations in force; in particular, if:

- ↪ the Data Subject has explicitly requested or consented to the transfer;
- ↪ the transfer is necessary for the performance of a contract concluded between the data subject and the Controller or the performance of pre-contractual measures taken at the request of the Data Subject;
- ↪ the transfer is necessary for the conclusion or performance of a contract concluded between the Controller and another natural or legal person in favour of the Data Subject;
- ↪ the transfer is necessary for the establishment, exercise or defence of legal claims;

8. DISSEMINATION

Unless further communication to the Data Subjects and/or specific requests for consent are made, personal data will not be disseminated.

9. DISCLOSURE AND UPDATING OF DATA - WHEN IT IS MANDATORY TO PROVIDE ONE'S OWN DATA

The disclosure and updating of the data requested at the time of or following the registration is carried out on a voluntarily basis; of course, the data in the absence of which it will not be possible to issue the InViola Card, to participate in the prize competitions and to receive the relative prizes will be indicated

10. DATA CONTROLLER

The Controller is ACF Fiorentina S.r.l. a socio unico, Tax Code/VAT No. 05248440488.

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

11 RIGHTS OF THE DATA SUBJECT

The Data Subject has the right:

- ↳ to request from the data Controller access to and rectification or erasure of personal data (if no longer necessary; incomplete, incorrect or collected in breach of the law) or restriction of the processing of personal data concerning him/her and to object to their processing;
- ↳ if the processing is carried out by automated (IT) means and insofar as it is technically possible, to receive in a structured format or have the information concerning him/her sent to him/her or to third parties indicated by him/her;
- ↳ to withdraw his/her 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;
- ↳ if the response to his/her request is not satisfactory or he/she considers it necessary, to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) <http://www.garanteprivacy.it/>)
- Piazza di Monte Citorio No.11, 00187 ROME - - Telephone switchboard: (+39) 06.696771 - E-mail: protocollo@gpdp.it - certified mail protocollo@pec.gpdp.it

In order to exercise their rights, the data subject may contact ACF FIORENTINA S.r.l. via the e-mail address infoprivacy@acffiorentina.it or by sending a registered letter to the address in the footnote, bearing in mind that it will not be possible to reply to requests where there is no certainty as to the applicant's identity.

12. AMENDMENTS TO THIS INFORMATION NOTICE

Any amendment to this information notice, which concerns significant aspects with respect to any consents given and processing carried out, will be notified by e-mail, however, Data Subjects are invited to periodically check the contents of this document. In order to facilitate this verification, the information published on the site will always contain an indication of the date when it was updated.