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INFORMATION NOTICE to the PUBLIC

(Articles 12-13-14 EU Reg 2016/679)

In the scope of the continuous updating of procedures aimed at respecting the privacy of the public and personal data protection regulations, we deemed it appropriate to summarise in this document all the elements concerning the processing of personal data already present in the documentation made available to the public, supplemented with more specific indications with a view to conferring maximum transparency on our work regarding all the data acquired in the activities of issuing tickets and subscriptions, as well as the management of certain forms of payment made available to data subjects, including in the purchase of various products/services. For processing related to the issuance and management of the **InViola Card**, the information made available on the website remains valid <https://www.acffiorentina.com>

1. WHICH DATA ARE PROCESSED

- ⇒ data provided by the data subject (e.g. the supporter who makes a purchase or requests a service, etc., 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 (name, surname, details and/or copy of an identity document and, for the purchase/reservation of tickets at concessionary fares: details of any accompanying person, special requests to meet his/her own or his/her accompanying person's special needs, any documentation attesting to the type and degree of disability, etc.) which may also include “special” categories of personal data;
- ⇒ data relating to the services purchased and the events attended or attended (e.g. time, seat number assigned, fare applied and reason);
- ⇒ data relating to the person (relative, accompanying person, entity, company, association, other) who purchased the ticket on behalf of the Data Subject;
- ⇒ data originating in the course of sporting events, collected at the request of the Data Subject or in application of the “Code of Conduct” and the rules of use in force at the venue where the event is held;
- ⇒ in some cases copy of an identity document of the ticket holder.

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; such data may only be processed upon the Data Subject giving their consent. 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.

Some of the data described above, such as those collected in connection with the issuance of concessionary tickets, fall into this category, which is why specific consents will be requested from the Data Subject, should the characteristics or modalities of the processing require it.

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.

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

Only those processing operations will be carried out that are necessary in relation to the purposes listed below, 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 in accordance with Articles 6 and 9 of EU Reg. 2016/679]:

- ⇒ fulfil obligations arising from laws, regulations or EU legislation [legal basis: compliance with a legal obligation - Article 6, para. 1 lett. c]; in this regard, please note that:



- ⇒ the tax regulations require the entity issuing a discounted ticket to identify the beneficiary while requesting documentation proving that he or she meets the requirements for the discount to be granted,
- ⇒ legislation in force on the prevention and suppression of violence related to football competitions expressly requires that the request to purchase admission tickets to sports venues be accompanied by the presentation of a valid identity document for each holder of each ticket; **for this reason, a copy of an identity document may be required for each holder for whom an access ticket (ticket or season ticket) is requested**, in particular for purchases made by persons other than the holder of the access ticket; moreover, in the latter case, the presentation of the copy of the document makes it possible to certify that the purchaser is actually authorised by the holder of the access ticket to make the purchase,
- ⇒ fulfil requests by the Judicial Authority or the Judicial Police and the Public Security Authority in connection with public order requirements [legal basis: compliance with a legal obligation - Article 6, para. 1 lett. c];
- ⇒ fulfil contractual, accounting and tax obligations [legal basis: compliance with a legal obligation and performance of a contract - Article 6, para. 1 lett. b-c];
- ⇒ apply the “Code of Conduct” and the rules of use that the Data Subject is required to comply with in the event of access to the facilities always available at <https://www.acffiorentina.com/it/biglitteria/procedure-regolamenti> [legal basis: compliance with a legal obligation and performance of a contract - Article 6, para. 1 lett. b-c];
- ⇒ data management, address books and internal statistical calculations [legal basis: data controller’s legitimate interest consisting in the efficient organisation of activities , Article 6, para. 1 lett. f];
- ⇒ possibly protect a legitimate interest, assert or defend a right, [legal basis: consistent with the purpose of the data processing, Article 6, para. 1 lett. f Article 9, para. 2 lett. f];
- ⇒ satisfy any requests made by the Data Subject; any contact details provided may be used for communications relating to the scheduling of the event that the Data Subject intends to attend (being a season ticket holder or having purchased a ticket), [legal basis: performance of a contract - Article 6, para. 1 lett. b and Data Controller’s legitimate interest, consisting in the organisation of the activities and of the Data Subject, coinciding with the subject of any request].

3.1 COMMUNICATION AND DIRECT MARKETING:

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. [legal basis: Data Controller’s 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 ACF FIORENTINA or their membership to a Viola Club, Article 6, para. 1 lett. f and Legislative Decree 196/2003 Article 130 para. 4]

Having said this, Data Subject’s consent is requested in order to be able to use the contact details provided by him/her (telephone and postal) for invitations to events, for commercial and promotional purposes, also in relation to products and services of a different nature offered by partners and sponsors (to whom the data will not be transferred at all: such communications will always be made by ACF Fiorentina) [legal basis: Data Subject’s consent, Article 6, para. 1 lett. a]

The provision of data and consent for this purpose shall be on a voluntarily basis, in the absence of which the fulfilment of the Data Subject’s requests will not be precluded, but will imply the impossibility of receiving material and informative/advertising communications deemed adequate. **Even if consent has been given, the Data Subject may object to this processing at any time**

3.2 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 asserted 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)

4. 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.

5. RETENTION PERIOD

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:

- ✎ administrative documents and data will be retained in accordance with the provisions of Article 2220 of the Italian Civil Code “Retention of Accounting Records” (10 years)
- ✎ 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 18 months after the last contact/sent by the Data Subject or until the Data Subject's consent is withdrawn, after which they will be anonymised and used for statistical purposes;
- ✎ credit card data necessary to prove the correctness of purchase procedures will be retained for 90 days, the maximum period within which disputes can be notified, also for the protection of Data Subjects
- ✎ the data collected and processed in application of the “Code of Conduct - Artemio Franchi stadium of Florence” will be kept for at least one football season; in the event of serious infringements or litigation, the data will be kept for the time necessary to ensure the correct application of the Code and of the related regulations in force.

4. 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:

- ✎ ticket/subscription issuing staff - call centre staff;
- ✎ Security and access control managers and officers;
- ✎ administrative staff to manage administrative aspects;
- ✎ Business and management department;
- ✎ marketing officers, personnel in charge of processing for marketing and communication activities
- ✎ with the exclusion of systematic consultation, 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;
- ✎ other companies/consultants, appointed as external Processors (Art. 28 of EU Reg. 2016/679), who need access to certain data for the above purposes, to the extent strictly necessary to perform the tasks entrusted to them such as: assistance in the fulfilment or direct performance of tax/accounting requirements, management of information systems, financial services, ticketing.

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

5. 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;
- ✎ Public Security Authorities, Police Forces engaged in Public Order services, Judiciary Authorities and Judicial Police;
- ✎ other persons who may have access to the data by virtue of a provision of law, regulation or EU legislation, within the limits provided for by these rules;
- ✎ to banks, credit institutions, data processing companies and credit card issuing companies, limited to accounting and tax data, for activities strictly related to operations and administrative management;
- ✎ persons indicated by the Data Subject or by a person acting on his or her behalf;
- ✎ other parties (companies/consultants) who need access to certain data for activities auxiliary to the above-mentioned purposes, to the extent strictly necessary to perform the tasks entrusted to them such as: information systems management, financial services;
- ✎ entities which acted as intermediaries for the purchase of named tickets (associations, ticketing agencies, etc.) in the form of confirmation, which have direct dealings with the Data Subject; in this context, the processing of the data in question may also consist in their communication abroad, both within and outside the European Union to the country of origin of the Data Subject.

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.

6 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;

7. DISSEMINATION

Unless further communication to the Data Subjects and/or specific requests for consent are made, personal data will not be disseminated. **However, it must be pointed out that television footage/recordings/photographs intended for broadcasting, including by third parties (e.g. newspapers or television stations), in which identifiable spectators/spectators may appear, are taken during events.**

8. DISCLOSURE AND UPDATING OF DATA - When it is mandatory to provide one's own data

The disclosure and updating of one's own data is mandatory insofar as it relates to the fulfilment of legal, contractual and tax obligations connected with the issuance and management of tickets and subscriptions, as well as obligations arising from regulations in force. Failure to comply with this obligation on the part of the Data Subject would result in the impossibility of fulfilling his or her requests and carrying out all the normal practices related to the issuing of tickets/subscriptions, with the consequent impossibility of access to the sports facility. Of course, on a case-by-case basis, an indication is always given of the data whose disclosure is mandatory in relation to the aforementioned purposes, depending on the means used (by means of highlighting on forms and forms on the website or indication by the staff for purchases made by telephone).

9. 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.

10 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.

11. 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.