



NOTICE given to data subjects applying for an InViola Card and participating in related prize transactions or promotional initiatives - (Articles 12-13-14 EU Reg 2016/679)

IN SUMMARY

some information deemed of most interest, not excluding reading the full disclosure

Personal data provided by the interested party 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 communication and updating of the data required at the time of membership or subsequently to it are entirely optional in nature; an indication will be given of the data in the absence of which it will not be possible to issue the InViola Card, participation in the prize operations and the disbursement of the related prizes

The purposes of processing will always be related to the proper administrative and operational management of the InViola program, prize operations and initiatives reserved for InViola members.

Data will also be processed:

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

An account will be created that can be reached at <https://www.acffiorentina.com>, which will allow the interested party to

- ↪ edit/update and verify your profile at any time,
- ↪ possibly registering 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 as part of prize transactions

The data will be kept only for the time allowed/imposed by current regulations applicable to the specific purpose for which the data are processed; specifically:

- ↪ profiling data, if allowed by the data subject, and data for which he/she has granted use, including for commercial purposes, will be retained for 12 months following the last contact/sent by the data subject or until his/her consent is revoked or he/she indicates otherwise,
- ↪ account data will be retained until the account is deleted by the data subject as defined on the InViola Card Policy

Data may be disclosed

- ↪ to subjects who can access the data by virtue of a provision of the law, regulation or EU legislation, within the limits provided by these rules;
- ↪ to Partners/Affiliates who join and participate in the sweepstakes and initiatives promoted under the InViola program,
- ↪ other Subjects (Companies /professionals), whether or not related to the Holder who collaborate in the management of operations and disbursement of prizes, or who perform auxiliary activities to the purposes stated above, to the extent strictly necessary to carry out the tasks entrusted to them such as: information systems management, financial services.

The data controller in question is ACF Fiorentina S. r. l. a socio unico, with registered office in Viale M. Fanti n. 4 - Florence - Cod. Fisc./P.IVA **05248440488**.

The Data Controller has appointed a Data Protection Officer who is assigned to oversee compliance with data protection regulations whose contact details are: rpd@acffiorentina.it

The interested party may exercise his or her rights by means of the e-mail address infoprivacy@acffiorentina.it or by sending a registered letter to the above address, or by means of the number + 055571259 bearing in mind that it will not be possible to respond to requests received by telephone where there is no certainty as to the identity of the applicant



FULL DISCLOSURE

1. WHAT DATA ARE PROCESSED:

- ↻ data provided by the interested party (the Fan applying for the InViola Card, hereinafter "Interested Party") directly or through parties authorized by him/her, among which "special" categories of personal data could also be included;
- ↻ data on events organized by the promoter of InViola Card-related prize operations that the Interested Party intends to attend or has attended using the InViola Card;
- ↻ data related to membership and participation in loyalty initiatives and programs promoted by ACF Fiorentina;
- ↻ other data related to the use of the InViola Card.
- ↻ data on the accumulated points and prizes chosen in the sweepstakes;
- ↻ data on purchases made using the InViola Card, to 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/exercise at which the purchase is made) or other elements (e.g.:value of the purchase, etc.);

And, in connection with the InViola Premium Card:

- ↻ possession or non-possession of the necessary requirements for obtaining the "Fan Card" (Outcomes of applications for clearance to the P.S. Authority, notices or bans, other measures communicated by the P.S. Authority, etc.)

The legislation establishes special protections for data relating to criminal convictions and offenses and/or 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 genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation. With regard to this point, special attention is paid to acquiring only the data and carrying out only the processing necessary to satisfy legitimate requests from 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.DATA ORIGIN

Recruitment and updating of personal data may take place:

- ↻ through the data subject himself/herself and/or, if a minor, through those exercising parental responsibility (parents or guardians or persons delegated by them);
- ↻ through intermediary parties authorized by the Interested Party (relative, companion, entity, company, ticketing agency, association, other);
- ↻ from sources freely available to anyone;
- ↻ by the P.S. Authority or Police Forces for all matters pertaining to public safety regulations related to the events.

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

Personal data will be processed for the following purposes, for each of which the "legal basis" that makes it possible is indicated in parentheses [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 operations that the interested parties 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 interested party 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 consistencies in the efficient organization of activities art. 6 c.1 lett. f Reg.UE 2016/679 - contractual-legal fulfillment- art. 6 c.1 lett. b-c- Reg.UE 2016/679]
- b) to fulfill obligations arising from laws, a regulation or EU legislation with particular regard to Ministerial Decree Min. Interno 6/6/2005, Law 4/4/2007 n. 41 and in general to all to the to the legislation on the *nominativeness of access tickets to sports facilities*; fulfill contractual and accounting and tax obligations, [legal basis: contractual-legal fulfillment- art. 6 c.1 lett. b-c- Reg.UE 2016/679]
- c) fulfillment of provisions issued by the P.S. Authority, the Judicial Authority and Public Bodies that have this power, [legal basis: legal fulfillment- art. 6 c.1 lett. c- Reg.UE 2016/679]
- d) satisfy the requests of the interested party by allowing access to multimedia content reserved for InViola members [legal basis: legitimate interest of the interested party coinciding with the object of the request art. 6 c.1 lett. f]



- e) Management of customer master data, address books and internal statistical calculations of the company, - Statistical analysis carried out only by aggregation of previously anonymized data; [legal basis: legitimate interest consistencies in the efficient organization of activities art. 6 c.1 lett. f]
- f) possibly protect a legitimate interest, assert or defend a right, [legal basis: coinciding with the purpose art. 6 c.1 lett. f - art. 9 c. 2 lett. f Reg.EU 2016/679]

3.1 Communication and Direct Marketing. [legal basis: legitimate interest consisting in processing personal data for direct marketing purposes always taking into account the reasonable expectations held by the data subject based on his/her relationship with the Controller taking into account the relationship with the data subject - art. 6 c.1 lett. f Reg.UE 2016/679 - D: Lgs. 196/2003 art. 130 c.4 - consent of the data subject]

As also indicated on the *Information Notice provided to the public pursuant to Articles 13 and 14 EU Reg. 2016/679*, unless otherwise advised by the data subject, the e-mail address provided by him/her in the context of the purchase will be used to send courtesy communications and/or informational material/offers related to products and services similar or related to the object of the purchase itself. This being said, the consent of the interested party is requested in order to be able to use in any case also the other contact details provided by him (telephone, postal, etc.), for commercial purposes, for direct marketing activities, for promotional activities, for sending informative and advertising material, direct sales, fulfillment of market research, for invitations to events, offers, individual or personalized advertising.; this also through operator calls, E-Mail, SMS, fax, MMS and the other platforms and communication channels, such as whatsapp, skype, etc.

The provision of data and consent for this purpose is optional in their absence, however, participation in the loyalty program will not be precluded, but the possibility for the person concerned to receive informative/advertising material and communications deemed of interest to him or her or relating to opportunities reserved for InViola members may be limited. Even having given their consent, the interested party will have the right to object at any time to this processing

Our purpose is to offer proposals that are of real interest and to activate ourselves in targeted communications and campaigns or particularly advantageous reports often limited in time and/or quantity; for these reasons it is necessary to preserve the possibility of choosing from time to time the communication channel most effective and suitable for each circumstance, taking into account the fact that , in addition to the rights recognized to Him by the legislation, the freedom of choice of the Interested Party is still guaranteed by the obvious possibility of denying his consent and providing or not providing the requested contact information optionally.

3.2 Profiling: we want to know our supporter, their interests and needs in order to better assist them - [legal basis: consent of the data subject - art. 6 c.1 lett. of Reg.EU 2016/679]

With the consent of the Data Subject, the data referred to in point 1 may be used and analyzed to detect consumer habits, interests and propensities, and generate profiles that will allow us to proactively identify interests and needs, this also through correlation with other data acquired from:

- ↳ Interaction of the data subject with the internet platforms of ACF FIORENTINA, use of the APP, purchases made on the website <https://www.fiorentinastore.com/it/>
- ↳ Social profiles made accessible by the data subject.

This activity will allow us to send out offers and communications that are sure to be of interest and certainly beneficial to the recipient, better addressing the activities mentioned in the previous paragraph

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

3.3 In summary treatments referred to in this policy may be carried out as necessary:

- ↳ as necessary to fulfill obligations arising from a contract to which the data subject is a party, and related legal obligations
- ↳ as necessary for the pursuit of legitimate interests of the Data Controller or the data subject,
- ↳ as necessary to assert or defend a right in court or to assess whether there is a right to be usefully protected in court,
- ↳ having the person concerned express his or her consent, (in particular in relation to the processing of certain special categories of personal data, in relation to the use of contact details other than the e-mail address provided at the time of entering into the contract for commercial and advertising communications referred to in point 3.1 above, and in relation to profiling activities referred to in point 3.2 above)

4. HOW THE DATA ARE PROCESSED Mode of processing.

In relation to the aforementioned purposes, the processing of personal data may take place by means of paper, computer and telematic tools. and will include all the operations or complex of operations necessary for the achievement of the



purposes from time to time applicable; always ensuring absolute confidentiality, relevance and not exceeding the purposes described above.

4.1 CREATING AN ACCOUNT

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

Through the account it will be possible:

- edit/update and verify their profile at any time,
 - possibly registering for new initiatives/events of their interest more easily and enjoying the priority offered to registered users,
- use additional content and services,

5. STORAGE TIMES

Personal data, subject to the provisions of the regulations on the retention of administrative records (which provide for a retention time of 10 years) will be retained only for the time allowed/imposed by the current regulations applicable to the specific purpose for which the data are processed; more specifically:

- ↳ profiling data, if allowed by the data subject, and data for which he/she has also granted use for commercial purposes (e-mail addresses and other contact details) will be retained for 12 months following the last contact/sent by the data subject or until his/her consent is revoked or he/she is otherwise informed,
- ↳ account data will be retained until the account is deleted by the data subject as defined on the InViola Card Policy after which they will be anonymized 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:

- ↳ personnel involved in the management of prize operations (corporate management and management, communications and marketing staff, administrative staff to handle administrative aspects, etc.)
- ↳ resources responsible for the operation and maintenance of information systems that are responsible for ensuring systems functionality, data security, and backup operations,
- ↳ by the External Company appointed as data controller ex art.28 Reg.UE 2016/679, which provides and manages the IT platform used for the sweepstakes and related contests,
- ↳ subjects (Companies/professionals), connected or not to the Owner who collaborate, as Responsible Parties (art. 28 EU Reg 2016/79), to the management of the prize operations and the disbursement of the prizes, or who carry out auxiliary activities to the purposes stated above, to the extent strictly necessary to carry out the tasks entrusted to them such as: assistance in the fulfillment or direct execution of tax/accounting/assistance obligations, management of information systems, financial services,

It is understood that the above-mentioned persons are authorized to use the data to the extent actually necessary to perform their functions.

7. WHO CAN BE COMMUNICATED TO - scope of communication -.

Personal data related to these treatments may be communicated or made available to:

- ↳ associated companies (parent, subsidiary, investee, under the same control), for current administrative-accounting purposes,
- ↳ to subjects who can access the data by virtue of a provision of the law, regulation or EU legislation, within the limits provided 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 the performance of administrative tasks,
- ↳ to parties indicated by the Interested Party or by a person acting on his/her behalf,
- ↳ to Partners/Affiliates who join and participate in the sweepstakes and initiatives promoted under the InViola program,



- ↳ other Subjects (Companies /professionals), connected or not to the Holder who collaborate in the management of operations and disbursement of prizes, or who carry out activities auxiliary to the purposes stated above, to the extent strictly necessary to carry out the tasks entrusted to them such as: information systems management, financial services.

Of course, all communications described above are limited only to the data necessary for the recipient body/office (which will remain the autonomous owner for all consequent processing) to carry out its tasks and/or to achieve the purposes related to the communication itself, always with reference to the purposes stated above.

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 exclusively in recurrence of the prerequisites of legitimacy mentioned above and in compliance with current legislation, in particular where:

- ↳ 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 data 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 data controller and another natural or legal person for the benefit of the data subject;
- ↳ the transfer is necessary to establish, exercise or defend a right in court;

8. DIFFUSION.

Unless further communication towards data subjects and/or specific requests for consent, personal data will not be disseminated. **9.COMMUNICATION AND UPDATING OF DATA - WHEN IT IS MANDATORY TO COMMUNICATE YOUR DATA**

The communication and updating of the data required at the time of accession or subsequent to it are entirely optional in nature; of course, an indication will always be given of the data in the absence of which it will not be possible to issue the InViola Card, participation in the prize operations and the disbursement of the relevant prizes

10. DATA CONTROLLER

The owner of the processing in question is ACF Fiorentina S.r.l. a socio unico, based in Viale M. Fanti No. 4 - Florence - Fiscal Code / VAT No. 05248440488.

The Data Controller has appointed a Data Protection Officer who is assigned to oversee compliance with data protection regulations 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 deletion of personal data (if no longer necessary; incomplete, erroneous or collected in violation of the law) or restriction of the processing of personal data concerning him or her and to object to their processing,
- ↳ if the processing is carried out by automated (computerized) means and insofar as it is technically possible, to receive in a structured format or to transmit to Him or to third parties indicated by Him the information concerning Him,
- ↳ to revoke their consent at any time (without affecting the lawfulness of the processing based on the consent before revocation), of course this is for processing carried out on the basis of this assumption
- ↳ if the response to your request is not satisfactory or should you deem it necessary, to file a complaint with the Guarantor for the Protection of Personal Data (<http://www.garanteprivacy.it/>) - Piazza Venezia n. 11 00187 ROMA - Telephone switchboard: (+39) 06.696771 - E-mail: protocollo@gpdp.it - certified mail protocollo@pec.gpdp.it

In order to assert their rights, the interested party may contact ACF FIORENTINA S.r.l. by means of the e-mail address infoprivacy@acffiorentina.it or by sending a registered letter to the address specified above, or by means of the number + 055571259 specifying to the operator the nature of the request or the problem highlighted and bearing in mind that it will not be possible to respond to requests received by telephone where there is no certainty as to the identity of the applicant.



12. AMENDMENTS TO THIS POLICY

Any changes to this notice, which concern significant aspects with respect to any consents given and the processing carried out will be reported by e-mail, however, interested parties are invited to periodically check the contents of this document. In order to facilitate such verification, the notice published on the site will always contain an indication of the date of update.

In case of any discrepancy between the meanings of any translated versions of this policy, the meaning of the Italian language version shall prevail.