



NOTICE given to the PUBLIC

(Art. 12-13-14 EU Reg 2016/679)

As part of the activities of continuous updating of the procedures aimed at respecting the privacy of the public and the legislation on the protection of personal data, we thought it appropriate to summarize in this document all the elements regarding the processing of personal data already present in the documentation made available to the public, supplemented with more specific indications with the intention of giving maximum transparency to our work about all the data acquired in the activities of issuing tickets and subscriptions, as well as management of some forms of payment made available to interested parties, including in the purchase of various products/services. For processing related to the issuance and management of **InViola Cards**, what is stated in the information made available on the website <https://www.acffiorentina.com> remains valid.

1. WHAT DATA IS PROCESSED

- ⇒ data provided by the interested party (e.g.: the supporter person making a purchase or requesting a service, etc., hereinafter always referred to as the "Interested Party") directly or through parties authorized by him/her, in relation to the request made and therefore not listed here (first name, last name, details and/or copy of an identity document and, for the purchase/reservation of tickets at a concessionary rate: details of any accompanying person, special requests to meet his/her own or his/her accompanying person's special needs, possibly documentation attesting to the type and degree of disability, etc.), among which "special" categories of personal data may also be included;
- ⇒ data on the services purchased and the events he/she intends to attend or has attended (e.g., time, seat number assigned, fare charged and reason);
- ⇒ data related to the person (relative, companion, entity, company, association, other) who provided for the purchase of the ticket on behalf of the Interested Party;
- ⇒ data originating in the course of sporting events, acquired at the request of the data subject or in application of the "Code of Conduct - Artemio Franchi stadium in Florence"
- ⇒ In some cases, photocopy of an identity document of the ticket holder.

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; these data may be processed only with the consent of the data subject. Regarding this point, special care is taken in acquiring only the data and carrying out only those processing operations that are necessary to meet requests from 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 acquired in connection with the issuance of concessionary tickets, fall into this category, and for this reason specific consents will be requested from the data subject, should the characteristics or methods of processing require it.

2. DATA ORIGIN

Recruitment and updating of personal data may take place:

- ⇒ through the person concerned himself or, if a minor, through the person 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.

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

The processing operations that will be carried out have 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]:

- ⇒ Fulfill obligations arising from laws, a regulation or EU legislation [legal basis: legal fulfillment- art. 6 c.1 lett. c]; in this regard to recall that:



- ⇒ tax regulations require the entity issuing a concessionary fare ticket to identify the beneficiary while requesting documentation from him or her that he or she meets the requirements giving access to the concessionary fare,
- ⇒ current legislation on the prevention and suppression of violence related to football competitions expressly requires that the request for the purchase of access tickets to sports facilities be accompanied by the presentation of a valid identity document for each holder of each ticket; for **this reason, a photocopy of an identity document may be required for each holder for whom an access ticket** (ticket or season ticket) **is requested**, particularly 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 authorized by the holder of the access ticket to make the purchase,
- ⇒ Fulfilling requests from the Judicial Authority or Judicial Police and Public Security Authority in relation to public order requirements [*legal basis: legal fulfillment- art. 6 c.1 lett. c*]
- ⇒ fulfill contractual and accounting and tax obligations, [*legal basis: legal and contractual fulfillment - art. 6 c.1 lett. b-c*]
- ⇒ apply the provisions of the "Code of Conduct - Artemio Franchi Stadium in Florence" that the interested party is required to comply with in case of access to the facility [*legal basis: legal and contractual fulfillment - art. 6 c.1 lett. b-c*]
- ⇒ master data management, addressing and internal statistical calculations of the company, [*legal basis: legitimate interest of the Owner consisting in the efficient organization of activities, art. 6 c.1 lett. f*]
- ⇒ possibly protect a legitimate interest, assert or defend a right, [*legal basis: coincident with the purpose, art. 6 c.1 lett. f art. 9 c.2 lett. f*]
- ⇒ satisfy any requests made by the *Interested Party*; any contact details provided may be used for communications regarding the programming of the event the *Interested Party* intends to attend (being a season ticket holder or having purchased a ticket), [*legal basis: contractual fulfillment - art. 6 c.1 lett. b and legitimate interest of the Data Controller, consisting in the organization of the activities and of the interested party, coinciding with the object of any request*]

3.1 COMMUNICATION AND DIRECT MARKETING:

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/offerings regarding products and services similar or related to the object of the purchase itself. [*legal basis: legitimate interest of the Data Controller consisting in processing personal data for direct marketing purposes always taking into account the reasonable expectations nurtured by the data subject based on his relationship with ACF FIORENTINA or his membership to a Viola Club , art. 6 c.1 lett. f and D. Lgs. 196/2003 art. 130 c.4*]

That being said, the consent of the data subject 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, including with regard to products and services of 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: consent of the data subject, art. 6 c.1 lett. a*].

The provision of data and consent for this purpose is optional, in their absence will not be precluded from fulfilling the requests of the interested party but implies the impossibility of receiving material and informative/advertising communications deemed of interest. **Even having given their consent, the interested party will have the right to object at any time to this processing**

3.2 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, (particularly 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 at the time of entering into the contract for commercial and advertising communications referred to in section 3.1)

4. MODE OF TREATMENT

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.

5. STORAGE TIMES

Personal data, subject to the provisions of the regulations on the retention of administrative records (10 years ex art. 2220 c.c.) will be retained exclusively for the time allowed/imposed by current regulations applicable to the specific purpose for which the data are processed; more specifically:

- ✦ profiling data, if allowed by the data subject under the InViola program, and data processed for commercial purposes (e-mail addresses and other contact details) will be kept 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 anonymized and used for statistical purposes;
- ✦ credit card data necessary to prove the correctness in the purchase procedures, will be kept for 90 days, the maximum period within which disputes can be notified, this is also for the protection of the itneres themselves
- ✦ the data acquired and processed in application of the "Code of Conduct - Artemio Franchi stadium in Florence" will be kept for at least one sports season; in case of serious violations or litigation, the data will be kept for the time necessary to ensure the correct application of the Code and related regulations in force.

4. WHO THEY MAY BE HANDLED TO - managers and appointees

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

- ✦ ticketing/subscription staff - call center staff,
- ✦ Security and access control managers and officers;
- ✦ Administrative officers to manage administrative aspects,
- ✦ Business leadership and management,
- ✦ Marketing officers, assigned personnel for processing aimed at marketing and communication activities
- ✦ with the exclusion of systematic consultation, personnel responsible for the operation and maintenance of information systems who are responsible for ensuring the functionality of systems, data security, and backup operations,
- ✦ companies/consultants, appointed as Data Processors (Art. 28 of EU Reg. 2016/679), who need access to some data for activities auxiliary to the above purposes, 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, ticket-ticketing sales.

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

5. TO WHOM THEY MAY BE COMMUNICATED - 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,
- ✦ Public Security Authorities, Police Forces engaged in Public Order services, Judicial Authorities and Judicial Police
- ✦ to other parties 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 execution and administrative management,
- ✦ To parties indicated by the Interested Party or by a person acting on his/her behalf,
- ✦ to other parties (companies/consultants) who need access to certain data for activities auxiliary to the above purposes, to the extent strictly necessary to carry out the tasks entrusted to them such as, for example: information systems management, financial services,
- ✦ to entities that have acted as intermediaries for the purchase of named tickets (associations, ticketing agency, 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 of their communication abroad, both within and outside the European Union to the country of origin of the data subject.



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.

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 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;

7. DIFFUSION

Unless further communication towards the interested parties and/or specific requests for consent, personal data will not be disseminated. **However, it is necessary to point out that during the course of the events, television footage/recordings/photo reports intended for broadcasting are taken, including by third parties (e.g.: newspapers or television stations), in which identifiable spectators/ fans may appear.**

8. COMMUNICATION AND UPDATING DATA - when it is mandatory to communicate your data

The communication and updating of one's data is obligatory in nature limited to that which pertains to the performance of legal, contractual and fiscal obligations related to the issuance and management of tickets and subscriptions as well as obligations arising from current legal regulations. Failure to comply with this obligation on the part of the interested party would result in the impossibility of fulfilling his or her requests and carrying out all the normal practices related to the issuance of tickets/subscriptions with the consequent impossibility of access to the sports facility. Obviously, on a case-by-case basis, an indication is always given of the data whose communication is obligatory in relation to the aforementioned purposes depending on the means used (through highlighting on the forms and forms on the website or indication by the personnel in charge for purchases made by telephone).

9. DATA CONTROLLER

The owner of the processing in question is ACF Fiorentina S.r.l. a socio unico, with headquarters in Viale M. Fanti No. 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

10. 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@gdpd.it - certified mail protocollo@pec.gdpd.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 bearing in mind that it will not be possible to respond to requests, especially if received by telephone, where there is no certainty as to the identity of the applicant.

11. 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.