



FIorentina

NOTICE: This document is an English courtesy translation provided for informational purposes only. The original in Italian version remains the sole legally valid and binding text. In case of discrepancies between this translation and the original, the original version shall prevail, as it is the sole legally valid and binding version.

Information Notice on the Processing of Personal Data related to Events organised at ACF Fiorentina Facilities (Rocco B. Commisso Viola Park - Artemio Franchi Stadium) Articles 13 and 14 of Regulation (EU) 2016/679

- Rev. 2.0 of 09/09/2026

This document pertains to the processing of personal data carried out by ACF Fiorentina S.r.l., a single-member company (hereinafter "Fiorentina"), regarding individuals who participate in any capacity in events (guests, staff, service providers, artists, employees, suppliers, athletes, etc.), including those organized by other entities, in relation to which ACF Fiorentina acts as a service provider.

This privacy notice is also provided to data subjects by the organizing entity of each event and is made available at the access control points to the facilities.

1. WHICH DATA ARE PROCESSED and their origin

1.1 Only data that are relevant and not excessive in relation to the purposes listed below will be processed:

- ⇒ data and information provided directly by the data subject (at the time of identification related to access control and reception) or by persons delegated/authorised by them (event organiser and/or its delegates) and/or relating to the contractual relationship established with Fiorentina;
- ⇒ any tax and payment data (VAT number, fee, etc.), only for data subjects who enter into a direct contractual relationship with Fiorentina by purchasing further services available at the facility;
- ⇒ data originating in the context of the Event (access records, possible violations of the facility use rules, also conveyed to participants by the Organiser, etc.);
- ⇒ data relating to the entity (agency, company, association, other) that organised the Event or offered the data subject participation in the Event and, if applicable, the relationship it has with the data subject;
- ⇒ data relating to the services requested or used by the data subject;
- ⇒ data collected by the video surveillance system.

It should be noted that the applicable regulations provide for special protection for "Special categories of personal data" [Article 9, para. 1, defines special categories of data: "*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*"]. As a rule, the systematic processing of such categories of data is not foreseen, however this may be necessary in the context of certain services requested by the data subject, in respect of which the data subject themselves spontaneously communicate such data; to the latter regard, particular attention is paid in collecting only the data and in carrying out only the processing necessary to satisfy legitimate requests of the data subjects and only if pertinent and necessary in relation to the purposes indicated below; in some cases the nature of the event may highlight information that falls within the aforementioned special categories (e.g.: events organised by associations of a political or religious nature), in such cases Fiorentina will be careful not to store such information in such a form as to make evident personal data belonging to the special categories, unless the same are already manifestly made public by the data subject or by other subjects authorised to do so.

2. PURPOSE OF PROCESSING and legal bases

Only those processing activities 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 EU Reg. 2016/679, are listed in Article 6, para. 1 and, for special categories of data, in Article 9, para. 2*]:

- a. fulfil contractual and accounting and tax obligations arising from the contractual relationship involving the data subject as a user of the services purchased by the event organiser on his or her behalf [*legal basis: performance of a contract - Article 6, para. 1 lett. b EU Reg. 2016/679*];
- b. administrative and operational management of the event, where delegated to Fiorentina, (logistics, stewarding, drawing up lists of participants, etc.); in this context the contact details provided may be used for communications relating to the planning of the event involving the data subject, [*legal basis: legitimate interest consisting in the efficient organisation of the activities Article 6, para.1 lett. f - performance of a contract- Article 6, para.1 lett. b-c*];

- c. fulfil obligations arising from current legislation (laws, EU regulations); fulfilment of provisions issued by the Judicial Authority, the Financial Administration, inspection bodies *[legal basis: compliance with a legal obligation - Article 6, para.1 lett. c EU Reg. 2016/679];*
- d. control of the compliance with the rules and regulations in force at the Rocco B. Commisso Viola Park and/or the Artemio Franchi Stadium communicated to the data subjects by the organiser of the Event and/or by Fiorentina at the time of access to the structure and/or highlighted on notices and signs displayed inside the structure; *[legal basis: the purpose is to protect a legitimate interest consisting in the protection of the assets and the efficient organisation of the activities Article 6, para.1 lett. f];*
- e. access control and security of the premises and guests *[legal basis: the purpose is to protect a legitimate interest consisting in the protection of assets and the efficient organisation of activities Article 6, para.1 lett. f];*
- f. satisfaction of any requests made by the data subjects themselves, *[legal basis: data subject's legitimate interest, which is subject of the request Article 6, para.1 lett. f and data controller's legitimate interest consisting in the efficient organisation of activities Article 6, para.1 lett. f];*
- g. protecting any legitimate interest, ascertaining, asserting or defending a right *[legal basis: consistent with the purpose of the data processing Article 6, para.1 lett. f - Article 9, para. 2 lett. f EU Reg. 2016/679].*

4. PROCESSING MODALITIES and data retention

In relation to the above-mentioned purposes, the processing of personal data may take place using paper, computer and telematic tools, while always guaranteeing absolute confidentiality, relevance and not exceeding the purposes described above, in terms of data recording and retention periods. Without prejudice to the provisions of the rules on the retention of administrative documents, after the end of the event, the data will 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, personal data which are

- ↳ Processed for the purposes referred to in letters a and c of item 3 above will be stored in accordance with Articles 2220 and 2946 of the Italian Civil Code
- ↳ Processed for the purpose referred to in letter b of item 3 above, unless further notice is given, will be retained for the period necessary to prove the fulfilment of contractual obligations towards the event organiser
- ↳ Processed for the purposes referred to in letters d and e of item 3 above will be retained, unless further notice is given, for the period necessary to detect any violations (maximum 7 days); data relating to detected violations will be retained until the possible consequences of the violation have been exhausted
- ↳ Processed for the purpose set out in letter f will only be retained if necessary, in connection with the other purposes set out in item 3 above
- ↳ Processed for the purpose referred to in letter g will be retained until the fact or event giving rise to the need for protection has exhausted all possible effects.

5. BY WHOM THEY MAY BE PROCESSED

For the same purposes, the data may be processed on behalf of Fiorentina by the following categories of appointees and/or managers, always and only to the extent of what is actually necessary to perform their duties:

- ⇒ company management and executives;
- ⇒ event organisation and management staff, access control staff, - administration staff to manage administrative aspects,
- ⇒ other personnel (employees or freelance professionals) appointed directly by Fiorentina, always within the limits of the assignments received and the provisions of corporate procedures;
- ⇒ the Head of the Health and Safety/Security Department;
- ⇒ security and access control managers and officers;
- ⇒ with the exclusion of systematic access, personnel appointed for the management/maintenance of computer systems - system administrators;
- ⇒ companies/consultants, appointed as Data Processors pursuant to Art. 28 of EU Reg. 2016/679, who provide services necessary to the purposes referred to above 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, organisational/management consulting.

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

On a case-by-case basis, the data whose disclosure is mandatory in connection with the holding and participation in the event will be indicated by the organiser of the event itself, who has direct dealings with the data subject.

With the exception of certain cases arising from the organisational methods chosen for holding the event by the organiser, the disclosure of data is compulsory in relation to the purposes set out in points a – b – c – e above and cannot otherwise be pursued.

7. SCOPE OF DISCLOSURE - TO WHOM THEY MAY BE DISCLOSED

Personal data relating to the processing in question 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;
- ⇒ other entities, which provide services functional to the above-mentioned purposes;
- ⇒ limited to accounting and tax data to banks, credit institutions, data processing companies and credit card issuing companies, for activities strictly related to administrative management
- ⇒ the entity (agency, company, association, other) that organised the Event or offered the data subject participation in the Event

Of course, all disclosures are limited to the data necessary for the recipient entity (which will be the autonomous controller for all consequent processing) to achieve the legitimate purposes connected with the communication itself.

8. Transfer to non-EU countries

Personal data may also be transferred to persons located outside the European Union where this is necessary in connection with the above-mentioned purposes; in particular, to the country(ies):

- ⇒ in which the data subject is located
- ⇒ in which the Event organiser has its headquarters.

The transfer will always be carried out in full compliance with the law and exclusively for the above-mentioned purposes:

- ⇒ if one of the conditions set out in Article 49 of EU Reg. 2016/679 is met:
 - a) *the data subject has explicitly consented to the transfer;*
 - b) *the transfer is necessary for the performance of a contract concluded between the data subject and the data controller or for the execution of pre-contractual measures adopted at the request of the data subject;*
 - c) *is necessary for the conclusion or performance of a contract concluded between the data controller and another natural or legal person in favour of the data subject;*
 - e) *when it is necessary for the establishment, exercise or defence of legal claims;*
- ⇒ and/or to entities obliged to guarantee an adequate level of protection also by signing the standard contractual conditions indicated at European level (Commission Implementing Decision (EU) 2021/914 of 4 June 2021) or adopt and document other forms of adequate guarantee as provided for in Article 46 EU Reg. 2016/679

9. DISSEMINATION

Unless otherwise communicated to the data subject at the time of the invitation or at the time of participation in the event, the data will not be disseminated by Fiorentina; however, it must be pointed out that during events, especially if public or open to the public, third parties may also acquire television footage/recordings/photographs intended for broadcast, in which identifiable participants may appear.

10 VIDEO AND PHOTOGRAPHIC RECORDINGS DURING EVENTS OPEN TO THE PUBLIC

During public events organised or sponsored by Fiorentina, or in which it participates, video and photographic recordings are made which may be disseminated and published for the purpose of raising the profile and publicising the event itself.

Although these video and photographic recordings are intended to capture the context, they may allow individuals present at the event to be identified; therefore, it is considered appropriate to make this notice available.

Video and photographic recordings obtained directly by the Data Controller, the organiser or from freely accessible sources (such as images taken by third parties and published by them, for example, on social media platforms) may be:

- > processed, primarily by computerised and electronic means, exclusively by the data controller's staff and associates
- > used exclusively for information and advertising purposes, for an indefinite period,
- > reproduced and modified without distorting their context or meaning, whilst always safeguarding decency and dignity, in order to adapt them to the intended use and the medium employed,
- > stored indefinitely in the data controller's historical archives, together with details of the event on the occasion of which they were collected.

UNDER NO CIRCUMSTANCES will the video and photographic recordings be used by the Data Controller in contexts that would undermine the personal dignity and decorum of any identifiable individuals captured on camera.

The legal basis for the processing lies in the Data Controller's legitimate interest, which consists of the desire to give the widest possible publicity to the public events it sponsors or organises; this is in light of the fact that particular care is taken to

ensure that footage is clearly contextual and not intended to enable the identification of participants (which may, however, occur incidentally), unless they are public figures or a specific consent form has been signed.

10.1. Video and photographic footage intended to depict the setting rather than specific individuals

Particular care is taken to ensure that footage is clearly contextual and not intended to allow the identification of participants (which may, however, occur incidentally), unless they are public figures. Video and photographic recordings, when clearly intended to depict the context of a public event rather than specific individuals, do not require a release form (Article 96 of Law No. 633/1941: ... 'The consent of the person depicted is not required ... [omission] ... when the reproduction relates to facts, events or ceremonies of public interest or which took place in public.').

10.2. Video and photographic recordings depicting specific individuals

During certain events, a photographer may be present who may also take photographs of individuals or small groups; such images do not fall within the exemptions set out in Article 96 of Law No. 633/1941; consequently, the staff involved may ask individuals to sign a specific consent form or verbally request their authorisation, whilst recording their response and their full name on video, so as to be able to document their consent; It is specified that such a recording will be deleted immediately should the individuals concerned give a negative response.

Without prejudice to the rights of the individuals concerned, in the event of an affirmative response, the recording will be retained together with the photographs to which it relates for the entire period during which the images are stored, processed and disseminated.

The purposes pursued by the data controller remain:

- > the publication of photographs and/or video footage on any media, in any format, for advertising and promotional purposes and to raise the profile and publicise the event [legal basis: consent of the data subjects]
- > to demonstrate the lawfulness of the Data Controller's actions and ensure compliance with current legislation [legal basis: compliance with legal obligations, Article 6(1)(c) of EU Regulation 2016/679]
- > to assert or defend a legal claim [legal basis: Article 9(2)(f) of EU Regulation 2016/679]

The provision of consent and, consequently, of data, is obviously optional; should consent not be given, there will be no consequences for the data subjects

Records of consent not intended for disclosure may be disclosed to public authorities (for the performance of their institutional functions, within the limits established by law and regulations) and to entities (companies, professionals, etc.) that provide services related to the purposes referred to above.

11. DATA CONTROLLER

The Data Controller is ACF FIORENTINA S.r.l.

ACF FIORENTINA S.r.l. 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@acfflorentina.it.

12. 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 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 on the basis of his or her consent, to receive in a structured, commonly used and machine-readable format the personal data concerning him or her and/or to obtain their direct transmission to another data controller, if technically feasible;
- > 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;
- > to lodge a complaint with a supervisory authority. Garante per la protezione dei dati personali (Italian Data Protection Authority) - Piazza Venezia 11, IT-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@acfflorentina.it, bearing in mind that it will not be possible to reply to requests where there is no certainty as to the applicant's identity.