



**PRIVACY POLICY STATEMENT**

**PURSUANT TO (EU) 2016/679 ("GDPR") REGULATIONS AND APPLICABLE NATIONAL LEGISLATION CONCERNING THE PROTECTION OF PERSONAL DATA**  
(ver. 00-06 / 2018)

	<p><b>DEFINITION OF "DATA"</b></p> <p>"Data" means:</p> <ul style="list-style-type: none"> <li>- <b>Non-sensitive data:</b> personal data processed by Companies during Site navigation following user registration, such as name, surname, gender, place/country and date of birth, contact language, e-mail address and password, information about products/services purchased and any other data (such as tax code and payment information) required for the purchase and issue of <b>tickets</b> and/or <b>season tickets</b> and other data (photograph, residence, address) required in order to issue the <b>Supporter Card (Cuore Rossonero Card)</b>;</li> <li>- <b>Browsing data:</b> information acquired from computer systems and software procedures that is used to ensure routine operation of the Site; this information is not collected in order to be associated with identified data subjects but may, through processing and association with data held by third parties, allow identification of users; this category of data includes IP addresses or domain names of computers used by users who connect to the site, URI addresses (Uniform Resource Identifier) of requested resources, the time of the request, the method utilized to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters related to the operating system and the IT environment of the user.</li> <li>- <b>Data related to dispositions:</b> when purchasing tickets to enter the stadium or issuing and/or revoking a Supporter Card, data may also be processed relating to penal or administrative dispositions entailing a ban on entry into stadiums, if so communicated to AC Milan S.p.A. and/or Milan Entertainment S.r.l. by the competent authorities; this scope also includes judicial data that may be processed by Companies concerning offenses and crimes committed by persons who access the Stadium and who breach the Code of Conduct adopted by the Companies.</li> </ul>
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	<p><b>DATA SOURCE AND CATEGORIES OF DATA COLLECTED c/o THIRD PARTIES</b></p> <p>Data is collected from the data subject in person (and thereby directly made available by you) while navigation the Site and any other sites in which this Privacy Notification is published, as well as within the scope of services and products provided by them. Data relating to dispositions, on the other hand, may be communicated to the Company by competent authorities or other football clubs in application of the Code of Conduct required in order to take part in football events.</p>
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	PURPOSES OF PROCESSING		LAWFULNESS OF PROCESSING		DATA RETENTION PERIOD
	<p><b>Website Navigation:</b> navigation data is only used to obtain anonymous statistical information about Site usage and to verify correct operation and are stored for the time defined by pertinent legislation. Navigation data may be used to ascertain responsibility in the event of possible computer crimes against the Website.</p>		<p>Legitimate interest of the companies.</p>		<p>Navigation data is deleted immediately after processing or made anonymous.</p> <p>In the event of judicial litigation, if and when still existing, navigation data is kept for the entire duration of such action until the terms for appeals are attained.</p>
	<p><b>Registration in the confidential area of the Site and creation of the account:</b> non-sensitive data is used to compile the online form, where personal details are indicated (e.g. name, surname, date and place of birth, gender, e-mail). This data is required in order to activate authentication credentials (email + password) which the data subject will then use to access all areas and services of the Website exclusively for registered users.</p>		<p>Required in order to execute a request by the data subject or fulfil contractual obligations.</p>		<p>For the duration of the contract and thereby until the user closes the account.</p>



<p><b>Purchase of products or services:</b> non-sensitive data (e.g. name, surname, e-mail address, residence address, telephone) are required in order to execute purchases, ensure shipment of purchased products (and related commercial invoices), notify the user about transactions made, purchase tickets for entry into the Stadium and purchase tickets for the Mondo Milan Museum.</p>	<p>Fulfilling contractual obligations.</p>	<p>Ten years from the date of purchase and/or termination of the effects of the contract.</p>
<p><b>Assistance for the data subject:</b> non-sensitive data is processed in order to recognize the data subject and thereby provide assistance in response to specific requests of the said party regarding products or services provided by the Company or in order to optimize the use of services and send service notices regarding the user's profile.</p>	<p>Execution of dispositions implemented after signing the contract in order to improve user services and meet user expectations.</p>	<p>Ten years from the date of purchase and/or termination of the effects of the contract.</p>
<p><b>Management of tickets – Purchase and issue of tickets and/or season tickets:</b> Non-sensitive data such as name, surname, gender, place/country and date of birth and tax number are processed in order to issue the ticket and/or season ticket and provides related services. Non-sensitive data and data relating to dispositions may also be used to forbid access to the Stadium.</p>	<p>Fulfilling contractual obligations.</p> <p>Compliance with a legal obligation to which the data controller is subject.</p>	<p>Five years from the purchase of the ticket and/or season ticket.</p> <p>In the event of judicial litigation, for the entire duration of such action until the terms for appeals are attained.</p>
<p><b>Ticket Management - Supporter Card Management (Cuore Rossonero Card):</b> the non-sensitive data required for the Cuore Rossonero Card is processed for in order to issue this card and provide the services connected with it, including sending service communications (even electronically) strictly connected with the contractual relationship and to advantages arising from it, as well as the management of specific user requests. Non-sensitive data and data relating to dispositions may also be processed in order to withdraw the Supporter Card or prevent the possibility of utilising the Cuore Rossonero Card to download and use tickets.</p>	<p>Fulfilling contractual obligations.</p> <p>Compliance with a legal obligation to which the data controller is subject.</p>	<p>Ten years from the end of the season to which the Cuore Rossonero Card refers for possible administrative checks and/or management of judicial litigation.</p> <p>In the event of judicial litigation, for the entire duration of such action until the terms for appeals are attained.</p>
<p><b>Ticketing management – Issue of passes:</b> non-sensitive data such as name, surname, place and date of birth, role and company of reference are requested and processed in order to issue passes for people who must access the stadium for service purposes.</p>	<p>Fulfilling contractual obligations.</p>	<p>For the duration of the current season</p>
<p><b>Application of the Code of Conduct:</b> non-sensitive data relating to dispositions concerning persons accessing the Stadium are processed to verify compliance with the Code of Conduct adopted by the Companies and prevent entry by persons in breach of this code. Data concerning persons who are not authorized to enter</p>	<p>Compliance with legal obligations to which the Companies are subject.</p>	<p>Data relating to dispositions implemented in relation to the Code of Conduct will be stored for 10 years from the date of collection in order to comply with obligations to evaluate the possible repetition of the offence.</p>






the Stadium are stored in a dedicated database.		
<b>Evaluation of requests for authorisation for Banners and/or Choreographies:</b> non-sensitive data are processed to analyse requests even by forwarding the contents of the banner to competent Authorities for the purpose of issuing permits for display or performing the choreography.	Compliance with legal obligations to which the Companies are subject.	Data is stored for the entire duration of the season.  In the event of judicial litigation, for the entire duration of such action until the terms for appeals are attained.
<b>Disclosure of data related to participation to specialist articles:</b> any non-sensitive data provided and images and/or personal experiences shared in the context of involvement in specialist articles dedicated to supporters and their stories (e.g. the "OP-ED Column") may be disclosed, following acceptance of a specific release/waiver, through publication on Internet sites including social networks, in print and/or any other means of dissemination.	Consent of the data subject.	Personal data, images and/or personal experiences shared are stored until consent is withdrawn.
<b>Participation in promotions, competitions and prize draws:</b> Non-sensitive data such as name, surname and e-mail of the natural or legal person and data required by specific regulations will be processed for involvement in the initiative.	Fulfilling contractual obligations.	Five years from the termination of the initiative.
<b>Legal obligations:</b> processing of data, including data related to dispositions, in order to fulfil the obligations defined by application regulations and legislation (laws, regulations, including sector-related items) on a national and supranational scale. For example: - communications to Police Headquarters to ascertain the existence of requirements in order to issue the Cuore Rossonero Card as per Ministerial Decree DM 15 August 2009. - the application of the Code of Conduct adopted by the Companies to prevent entry to persons in breach of this code. Data concerning persons who are not authorized to enter the Stadium are stored in a dedicated database.	Execution of legal obligations to which the Companies are subject.	Ten years from collection.  Data communicated to Police Headquarters for the issue of the Cuore Rossonero Card will be stored as indicated with reference to this Support Card.  Data relating to dispositions implemented in relation to the Code of Conduct will be stored for 10 years from the data of collection in order to comply with obligations to evaluate the possible repetition of the offence.
<b>Defence in court and recovery of extrajudicial expenses:</b> if necessary, ascertain, exercise or defend the rights of the Company in court or to recover claims against the data subject.	Legitimate interest of the Companies to defend themselves in court against the data subject.	In the event of judicial litigation, for the entire duration of such action until the terms for appeals are attained.
<b>Direct Marketing:</b> by way of example, sending, using automated contact (such as text messages, e-mails, social networks, instant messaging apps, push notifications) and conventional (such as telephone calls with operator and surface mail) methods for promotional and commercial communications relating to the products/services offered by the	Consent of the data subject.	Withdrawal of consent.





Companies, including newsletters/mailling lists, or notification of corporate events, as well as customer satisfaction surveys, market surveys and statistical analysis.		
<b>Profiled Marketing:</b> of your preferences, habits, behaviour patterns and interests through analysis of purchases made using the Cuore Rossonero Card and/or the installation of cookies (e.g. navigation analysis, monitoring of selected products and the virtual shopping cart) in order to send customized sales communications promotional actions/offers and services tailored to your needs/preferences.	Consent of the data subject.	Withdrawal of consent (with the exception of data concerning details of purchases which is stored for 12 months from collection).
<b>Third party marketing:</b> marketing carried out by third parties (such as companies selling products and services in categories such as sports clothing and equipment, travel and vehicle services, food, household appliances, office machines, communication and television equipment and services, banking institutions, currency exchange, sports betting and personal hygiene), including Group companies, following the transfer of data. In particular, sending - using automated contact (such as texting and e-mail) and conventional (such as telephone calls with operator and traditional mail) methods - promotional and/or commercial communications and/or newsletters relating to third party products including Group companies, as well as carrying out market studies and statistical analysis.	Consent of the data subject.	Withdrawal of consent.
<b>Communication to Fondazione Milan Onlus (non-profit foundation):</b> communication of non-sensitive data such as personal and contact details to Fondazione Milan Onlus in order to send institutional communications and informative material via e-mail, telephone and/or printed mail related to the activities of Fondazione Milan Onlus.	Consent of the data subject.	Withdrawal of consent.
<p>Data processing is carried out electronically by means of collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Once the above storage terms have elapsed, Data will be destroyed or rendered anonymous, in keeping with technical cancellation and backup procedures.</p> <p>Kindly also note that the <b>Cuore Rossonero Card</b> has a microchip containing RFID technology, which allows the card to be read by the access turnstiles at the stadium from a distance varying between 1 and 10 centimetres. No data is stored at the turnstiles, which are only enabled to verify that the codes stored on the card match the costs for the event in question</p>		

	<b>DATA CONFERMENT</b>
	<p>Conferment of Data for the following purposes:</p> <ol style="list-style-type: none"> <li>a. <b>Website Navigation:</b> compulsory and necessary; failure to provide data may make it impossible to browse the Website;</li> <li>b. <b>Registration in the reserved area of the site and management of the account:</b> compulsory for registration with the site and use of services exclusively accessible through the reserved area; non-conferment does not affect free navigation of site pages that do not require registration;</li> </ol>



	<ul style="list-style-type: none"> <li>c. <b>Online purchase of products and services, assistance for data subject:</b> compulsory to ensure fulfilment of contractual obligations of the data controller as regards the data subject (such as shipment of goods purchased through the online store, release/ mailing of the Cuore Rossonero Card);</li> <li>d. <b>Management of tickets – Purchase and issue of tickets and/or season tickets, Management of Supporter Card (Cuore Rossonero card), Issue of Passes and Application of the Code of Conduct:</b> compulsory and necessary for issuing tickets and/or season tickets, badges and passes, as well as to meet the contract and allow access to the Stadium; any refusal to provide data or incompleteness may make it impossible for the Companies to provide services in their entirety and to comply with legal obligations;</li> <li>e. <b>Evaluation of requests for authorization for Banners and/or Choreographies:</b> compulsory obtain clearance for display of banners: incomplete compilation of the form will not allow your request to be assessed and it will not therefore be possible to display the banner;</li> <li>f. <b>Disclosure of data related to participation to specialist articles:</b> optional and non-conferment will not entail any consequences other than the impossibility of taking part in the specialist sections and, in this context, to share personal images and/or experiences;</li> <li>g. <b>Participation in promotions, competitions and prize draws:</b> compulsory, non-conferment will not entail any consequences other than the impossibility of taking part in promotions, competitions and prize draws;</li> <li>h. <b>Legal obligations:</b> it is compulsory to allow the data controller to fulfil the obligations defined by applicable regulations and laws (laws, regulations, including by sector) on a national and supranational scale;</li> <li>i. <b>Defence in court and recovery of extrajudicial expenses</b> compulsory to ensure the legitimate interest of the data controller to defend itself in court and/or recover a claim against the data subject;</li> <li>j. <b>Direct Marketing, Profiled Marketing, Third Party Marketing</b> optional and non-conferment will not entail any consequence other than not being able to receive promotions, discounts and commercial communications, including those appropriate to your needs/preferences, and to be informed about any marketing initiatives promoted by third party companies, including those belonging to the Group;</li> <li>k. <b>Communication Fondazione Milan Onlus</b> optional and non-conferment will not entail any consequence other than not being able to receive institutional communications and informative material about the activities of Fondazione Milan Onlus.</li> </ul>
	<p><b>RECIPIENTS OF DATA</b> Data may be divulged to persons acting as <b>processing managers</b>, including particular:</p> <ul style="list-style-type: none"> <li>a. Authorities and supervisory and control bodies and, in general, public or private entities having a right to request such data. In particular, for <b>Ticket Management - Supporter Card Management (Cuore Rossonero Card), Application of the Code of Conduct</b> and <b>Evaluation of requests for authorisation for Banners and/or Choreographies</b>, the Security Operative Unit (G.O.S.), State Police and Police Headquarters;</li> <li>b. Other football clubs for the <b>Application of the Code of Conduct</b>;</li> <li>c. Lawyers, accountants, auditors;</li> <li>d. Other Group Companies for the purposes indicated above.</li> </ul> <p>Data may be processed, on behalf of the data controller, to allow the performance of the activities described above by persons appointed as <b>data processing managers</b>, including, in particular:</p> <ul style="list-style-type: none"> <li>a. Companies that offer e-mailing services for marketing purposes;</li> <li>b. Companies that handle website maintenance;</li> <li>c. Companies that deal with goods shipment services;</li> <li>d. Companies that provide support in carrying out market studies;</li> <li>e. Companies that manage the online store and handle shipping and invoicing of products;</li> <li>f. Companies, including Group companies, which perform intercompany services.</li> </ul>
	<p><b>TRANSFER OF PERSONAL DATA</b> Data will not be disclosed and will not be transferred to non-EU countries. If this should occur, in order to ensure a suitable level of Personal Data protection, the transfer will only be made on the basis of suitability decisions approved by the European Commission or the adoption, by our companies, of the Standard Contractual Clauses required by the European Commission.</p>
	<p><b>AUTHORISED DATA PROCESSING SUBJECTS</b> Data may be processed by employees of company departments responsible for achieving the foregoing purposes who have been expressly authorized to process such data and have received appropriate operating instructions.</p>



	<p><b>RIGHTS OF THE DATA SUBJECT - COMPLAINTS TO THE CONTROL AUTHORITY</b></p> <p>Companies can be contacted by e-mail at <a href="mailto:privacy@acmilan.com">privacy@acmilan.com</a>, whereby data subjects:</p> <ul style="list-style-type: none"><li>• ask the data controller to confirm the existence or otherwise of data processing concerning them and, if so, to obtain access to such data as well as to information about processing, such as: purposes, the categories of personal data, recipients or categories of recipients to whom data may be communicated, the filing period, the existence of an automated decision-making process and the logic used, as well as the existence of appropriate assurances in the event of data transfer to a non-EU country;</li><li>• obtain updating, correction, integration or cancellation of data, as well as processing restrictions;</li><li>• oppose entirely or in part: a) for reasons associated with their specific circumstances, the processing of data for the legitimate interests of the Companies; b) to the processing of personal data concerning them for the purposes of direct marketing and/or profiled marketing carried out using automated (such as text messages, e-mails, social networks, instant messaging apps, push notifications) and conventional (such as phone calls with operator and traditional mail) contact methods;</li><li>• to receive data in a widely used, structured format that can be read by an automatic device, and, if technically feasible, transmit them to another data controller without impediments ("right to data portability");</li><li>• withdraw any consent granted at any time.</li></ul> <p>Data subjects also have the right to send a complaint to the competent Supervisory Authority.</p>
	<p>In addition, the Companies have appointed a Data Protection Officer (DPO), a specialist figure responsible for monitoring the procedures adopted by our Companies to protect data. You can contact our DPO by writing to <a href="mailto:dpo@acmilan.com">dpo@acmilan.com</a>.</p>