



**PRIVACY POLICY CONCERNING THE PROCESSING OF PERSONAL DATA  
PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION 2016/679 (“GDPR”) AND APPLICABLE NATIONAL  
LEGISLATION CONCERNING THE PROTECTION OF PERSONAL DATA**

**“CLIENTS’ PRIVACY POLICY”**

(ver. 00-06/2018)

Dear Mr/Mrs, please find below the information relevant to the “processing” of your personal data pursuant to the GDPR provided by **A.C. Milan S.p.A.**, as **Data Controller**, with headquarters in Via Aldo Rossi n. 8, 20149 Milan.

	<b>CATEGORIES OF PERSONAL DATA PROCESSED</b> Data” refers to the personal data processed by the Company for the stipulation and execution of the contractual relationship, such as those of Client’s legal representatives who sign the contract in the name and on behalf of the aforesaid, as well as client’ employees / consultants involved in the activities referred to in the contract.			
	<b>DATA SOURCE</b> Data are collected from the client during the pre-contractual negotiations and during the contractual relationship, or from third parties (by way of example but not limited to, common personal data collected from marketing information companies). The source of the data of suppliers’ employees / consultants involved in the activities referred to in the contract is the Client itself.			
	<b>PURPOSE OF THE PROCESSING</b>		<b>LEGAL GROUNDS</b>	<b>DATA RETENTION PERIOD</b>
Purposes related to the establishment and execution of the contractual relationship between the client and the Company, including the management of the personal data; the management of requests and / or purchase orders; contracts management, scouting, search for legal, corporate and reputation information and selection of clients		Execution of the contract for the Data of Clients’ legal representative.  Legitimate interest in the data of clients’ employees / consultants, involved in the activities referred to in the contract.		Contractual term and 10 years after termination. In the case of judicial litigation, for its entire duration, until the exhaustion of the terms of practicability of all appeals and/or a final judgement
Implementation of administrative and accounting obligations		Legal obligation to which the Company is subject to		
To verify, exercise and / or defend the rights of the Company before the Court, if needed		Legitimate interest		
Management of IT security and systems		Legitimate interest		
Data processing is carried out by using electronic and hard copy tools, by means of collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of the data. Once the data retention period expires, all Data will be destroyed or made anonymous, consistently with data deletion and backup procedures..				

	<b>DATA PROVISION</b> The provision of data is mandatory for the signing of the contract and / or for its execution. Therefore, refusal to provide the Data prevents from any contractual relationship and / or fulfillment of the resulting obligations.
	The data can be communicated to subjects operating as <b>data controllers</b> , among which, in particular: a. Supervisory and control authorities and bodies (eg Revenue Agency, Guardia di Finanza, SIAE); b. Other public entities (eg Lombardy Region, Municipality of Milan, Police Headquarters, Prefectures etc.) or private entities (eg Law firms, insurance companies, auditing companies, etc.) who are entitled to request the data. The data may be processed, on behalf of the data holder to allow the activities described above, by persons appointed as <b>data processors</b> , including, in particular:



	<p>a. Companies or professionals who provide support for the implementation and maintenance of IT system and business applications;</p> <p>b. Companies providing external services of electronic storage of administrative documentation;</p> <p>c. Companies, including companies belonging to the same group, that perform intercompany services.</p> <p>d. Companies responsible for providing IT, security and surveillance services</p>
	<p><b>SUBJECTS AUTHORIZED TO DATA PROCESSING</b></p> <p>The Data may be processed by employees of the company departments responsible for the pursuit of the aforementioned purposes, who have been expressly authorized to process such data and who have expressly authorized to process and have received appropriate operating instructions</p>
	<p><b>DATA TRANSFER</b></p> <p>The data will not be disclosed and will not be transferred to non-EU countries</p>
	<p><b>RIGHTS OF THE INTERESTED PARTY - COMPLAINTS TO THE DATA PROTECTION AUTHORITY</b></p> <p>By contacting the Company by e-mail at <a href="mailto:privacy@acmilan.com">privacy@acmilan.com</a>, data subjects shall have the right:</p> <ul style="list-style-type: none"><li>• to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: the purposes of the processing; the categories of personal data concerned; the recipients of categories of recipients to whom the data have been or will be disclosed; the envisaged period for which the personal data will be stored; the existence of automated decision-making, meaningful information about the logic involved, as well as the appropriate safeguards in the event of data transfer to an extra EU country;</li><li>• to obtain updating, correction, integration or cancellation of data, as well as processing restrictions;</li><li>• to oppose the processing in case of holder's legitimate interest;</li><li>• to receive the data in a structured, commonly used and machine-readable format, and, if technically feasible, to transmit those data to another data controller ("right to data portability");</li><li>• to revoke the consent given at any time;</li></ul> <p>The interested parties also have the right to file a complaint with the Data Protection Authority.</p>
	<p>Furthermore, the Data Controller has appointed the Person in charge of Personal Data Protection (DPO), a highly specialized professional, who will monitor the procedures enforced by our Company to protect his/her data. To contact the DPO can write to <a href="mailto:dpo@acmilan.com">dpo@acmilan.com</a></p>

Codice campo modificato