



AC MILAN

## PRIVACY POLICY FOR PERSONAL DATA PROCESSING

(pursuant to EU Regulation 679/2016 and the national regulations in force issued on 10 November 2010 – rev. 2023-01.19)

Pursuant art 13 and 14 of EU Regulation 679/2016 (hereinafter: **GDPR**) and of the national regulations in force regarding personal data processing, **AC Milan S.p.A.** and its controlled company **Milan Entertainment S.r.l.** with headoffices in Via Aldo Rossi, 8 20149 Milan (hereinafter, jointly and disjunctly: **the Companies**) are herewith supplying you the privacy policy relevant to the processing of the personal data requested for the stipulation, management and renewal of the agreement **CRN Card**.

### 1. Types of Data collected

The Personal Data requested for the stipulation and the management of the **CRN Card** contract and that will be subject to processing are: first name, surname, date of birth, photographic image, residence, address, gender, nationality, email address of the **Holder** of the Supporter's **Card** supplied upon the signing of the contract or subsequently during the relationship. If you are a minor, the data processed will be the name, surname, place and date of birth of the person who exercises parental responsibility. Legal data relative to criminal or administrative proceedings that lead to the Cardholder being prohibited from gaining access to Stadiums can also be processed, if communicated to AC Milan S.p.A. by the competent authorities. Data relating to violations of the "Regulatory Code of the transfer of access tickets to football events" enforced by AC Milan S.p.A may be processed.

### 2. Purposes of the processing

A.C. Milan S.p.A., as data controller, will process the data collected except in cases where explicit authorisations are required for the purposes of:

- a) executing the contractual obligations such as: the issue and renewal of the CRN Card and the provision of services connected to it, including service communications strictly related to the contractual relationship, benefits, privileges, dedicated services (such as, by way of non-exhaustive example, pre-sales, promotions on tickets for AC Milan's home matches, dedicated events, discounts on services and products), made available at AC Milan's discretion dedicated to **Card Holders**, as well as the management of your specific requests;
- b) the fulfillment of legal obligations to which AC Milan is subject such as, for example, communications to the Police Headquarters in order to ascertain the existence of the requisites pursuant to Ministerial Decree 15 August 2009, the application of the Regulatory Code for the transfer of access tickets to football events or the processing of judicial data to order the suspension / revocation of the **Card** and / or inhibit the possibility of uploading access tickets on the **Card** and / or to use them for various services;
- c) the pursuit of the Companies legitimate interests such as, for example, legal defense and extrajudicial debt recovery

The data collected are processed by AC Milan and Milan Entertainment S.r.l., as data controllers, only pursuant to your previous authorization for:

- d) **direct marketing**: sending by the Companies, via straight-through contact methods (such as text messages, e-mails, social networks, instant messaging apps, push notifications) and traditional methods (such as calls with operator and traditional mail), promotional and commercial communications relating to products / services offered and initiatives by the Companies and / or its Partners aimed at all AC Milan supporters, as well as surveying the degree of customer satisfaction, conducting surveys, market surveys and statistical analyzes;
- e) **soft spam**: sending to the e-mail address provided by you commercial communications relating to products or services similar to those already purchased. Each sending will allow you to refuse further mailings
- f) **profiled marketing**: of your preferences, habits, behaviour patterns and interests through analysis of purchases made using the CRN 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.
- g) **transfer of data to third parties for marketing purposes**: 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



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- h) **communication of the data to Fondazione Milan Onlus:** communication of the identification data to Fondazione Milan Onlus to send you institutional communications and information material relating to the activities of Fondazione Milan Onlus..

### 3. Processing procedure

Data processing is carried out as hard and soft copies and 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. Kindly also note that the CRN Card 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

### 4. Data Storage

Data are kept for the time necessary to fulfill the purposes indicated above and, in particular:

- for the purposes under 2, a), b) and c), for not more than 10 years from the end of the sports season to which the **Card** refers for any administrative checks and / or for the management of legal disputes. The data collected for the purpose of identifying the **Card Holder**, when there is the online procedure, will be deleted at the end of the procedure. In case of litigation, for the entire duration of the same, until the end of all appeals;
- for the purposes under 2, d) and f) of Direct Marketing and Profiled Marketing until the revocation of consent. The data are stored for 5 years from collection;
- for the purposes under 2, e) of soft spam for 5 years from the last purchase;
- for the purposes under 2, g) and h) until the revocation of the consent.

### 5. Provision of data

The conferral and processing of the data for the purposes under 2, a), b) and c) is mandatory for the issuance and renewal of the **Card** and for the execution of the contract; any refusal to provide the data, or provision of incomplete data can lead the Companies to being unable to fully issue the services and to comply with the legal obligations.

The provision of the data for the purposes under 2, d) e) f) g) and h) is optional and failure to provide it will have no consequence except for the impossibility for the Companies to carry out the activities described above.

### 6. Data Recipients

Data may be communicated to persons acting as processing managers, including particular: Authorities and supervisory and control bodies and, in general, public or private entities having a right to request such data and, in general, public or private subjects entitled to request the data. In particular the *Gruppo Operativo di Sicurezza* (G.O.S.), State Police and Police Headquarters for the appropriate fulfilment of law provisions.

### 7. Subjects entitled to the processing of the data

Data may be processed by employees of company departments responsible for achieving the foregoing purposes (affluent to Operations, Commercial, IT, Administration, Legal, Sporting areas and also pursuant to the purposes to be fulfilled based on the request of the data holder) who have been expressly authorized to process such data and have received appropriate operating instructions

### 8. Transfer of the data

The data could be transferred to those non-EU Countries who ensure an adequate level of data protection. The transfer of data will be made only on the basis of the decisions relevant to the level of suitability of the protection by the European Commission or the adoption by AC Milan of the contractual clauses prepared by the EU commission.

### 9. Rights of the data subject - Complaints to the control Authority

You may contact AC Milan via e-mail at [privacy@acmilan.com](mailto:privacy@acmilan.com), and

- 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;
- obtain updating, correction, integration or cancellation of data, as well as processing restrictions;
- 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



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messaging apps, push notifications) and conventional (such as phone calls with operator and traditional mail) contact methods;

- 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");
- withdraw any consent granted at any time.

Data subjects also have the right to send a complaint to the competent Supervisory Authority.

### **10. Data Controller and Data Supervisors**

The Data Controllers, for all the processing purposes expressed herein, (hereinafter "Data Controllers") are **AC Milan S.p.A.** and **Milan Entertainment S.r.l** with registered office in Milan, Via Aldo Rossi no. 8 – 20149.

The full list can be requested from the Data Controllers

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 [dpo@acmilan.com](mailto:dpo@acmilan.com).