

1. WHICH DATA ARE PROCESSED

- > data provided by the data subject (person who registers on the website and proceeds with a purchase, hereinafter “data subject”);
- > data relating to purchases made on the site;
- > administrative data linked to payments, other data concerning payments completed by the data subject;
- > data provided by the data subject in relation to any complaints and reports.

The legislation outlines specific protections for data related to criminal convictions and offences and/or special categories of data, such as: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, and data concerning health, sex life or sexual orientation. These types of data can only be processed with the consent of the data subject. Generally, there is no expectation that data falling within these categories will be captured. However, over the course of interactions with the data subject, particularly in the context of procedures related to complaints or other contact after purchase, the data subject may communicate these forms of personal data. With regard to this point, particular attention is paid to capturing only the data and carrying out only the processing that is necessary to fulfil the requests of the data subject and only where relevant and necessary for the purposes outlined below.

2. DATA SOURCE

Personal data may be provided and updated:

- by the data subject themselves;
- through intermediaries authorised by the data subject (family members, institutions, companies, associations, others) as part of the sales and delivery process for the purchased items;
- from sources freely accessible to anyone.

3. WHY DATA ARE PROCESSED - purpose of processing

Data processing will be carried out for the following reasons:

- a) to allow the data subject to purchase products from the site while ensuring their safety;
- b) to fulfil obligations deriving from laws, regulations or Community legislation; to fulfil contractual, accounting and fiscal obligations; to manage the sales process and related administrative obligations (receipts, refunds, etc.);
- c) to comply with provisions issued by the judicial authority and public bodies with such power;
- d) to manage personal data, addresses and the company's internal statistical calculations;
- e) to protect legitimate interests, to assert or defend rights if necessary;
- f) to fulfil the requests of the data subject;
- g) Unless otherwise advised by the data subject, the email address provided for the purchase will be used to send courtesy notifications and/or information/offers concerning products and services similar or related to the purchased item, for direct marketing activities, promotional activities, to send information or advertising materials, for invitations to events, offers and individual or personalised advertising.

3.1 WHY DATA CAN BE PROCESSED - legal basis for processing

Data may be processed for the purposes indicated below:

- > as necessary to fulfil any obligations arising from a contract involving the data subject, and any related legal obligations (in particular for the purposes outlined above in point 3a, b and c);
- > as necessary to pursue the legitimate interests of the data controller, including the successful organisation and planning of activities and improvements to services, the protection of assets and credit, the processing of personal data for direct marketing purposes while *always taking into account the reasonable expectations of the data subject based on the relationship with the data controller* (in particular for the purposes outlined in point 3g);
- > as necessary to assert or defend rights in court or to assess whether there is the need to protect particular rights in court.

4. HOW DATA ARE PROCESSED - processing methods

For the aforementioned purposes, the processing of personal data may be carried out on paper, via computerised or electronic means and shall include operations or a series of operations that are necessary to achieve the purposes that may apply at any given time, while always ensuring complete confidentiality, relevance and non-excess in relation to the purposes described above. Specifically, the data provided by the data subject will be included in the Fanatics Italy s.r.l databases and communicated to ACF Fiorentina S.r.l for the purposes referred to in point 3g above.

5. RETENTION PERIOD

Personal data, except where stipulated by retention rules for administrative records, will be retained only for the time allowed/imposed by current legislation that is applicable to the specific purpose for which the data are processed. Specifically:

- profiling data, if permitted by the data subject, and data processed for marketing purposes (email addresses and other contact details) will be held for 18 months after the last contact or message with the data subject or until they withdraw their consent, after which their information will be anonymised and used for statistical purposes;
- credit card details necessary to verify purchases will be kept for 90 days, the maximum period within which complaints can be made. This also protects the data subject.

6. TO WHOM DATA MAY BE COMMUNICATED - scope of communication

Personal data subject to the above processing may be communicated or made available to:

- > affiliated companies (parent companies, subsidiaries, investee companies, companies subject to the same auditing) for general administrative and accounting purposes;
- > other public bodies that can access the data in accordance with the law, regulations or Community legislation, within the limits of those rules;
- > banks, credit institutions, data processing companies and credit card issuers, limited to accounting and tax data only for activities strictly related to carrying out and managing administrative duties;
- > entities indicated by the data subject or by people acting on their behalf;
- > other entities (companies/consultants) which need access to certain data for ancillary activities for the purposes indicated above, within the limits that are strictly necessary to carry out the tasks entrusted to them, such as: information systems management, financial services, delivery services (shipping companies/couriers).

All communications described above are certainly limited only to the data necessary for the recipient entity/office (which will remain autonomous as a data controller for subsequent processing) to fulfil its duties and/or to achieve the outcomes intended by the communication, always in reference to the purposes stated above.

6.1 TRANSFER ABROAD

Personal data will only be transferred to third party sites outside of the European Union to the country in which the data subject resides or is located on the basis of the legal grounds outlined in point 3.1 and in compliance with current legislation.

7. DISTRIBUTION

Unless otherwise communicated to the data subject and/or in light of specific consent requests, personal data will not be disclosed.

8. COMMUNICATING AND UPDATING DATA - situations when communicating data is mandatory

Communicating and updating data is compulsory only for carrying out legal, contractual or tax obligations related to purchases made on the site (see 3a, b and c). Failure by the data subject to comply with this requirement would make it impossible to comply with their requests. Clearly, indications are always provided about the data that are required to be communicated for the purposes already described (via the forms on the website).

10. DATA CONTROLLER

The data controller for product sales and delivery processing (see 3a, b and c) is Fanatics Italy s.r.l, with registered office in Via Magistretti 10, 10128, Milan.

Co-controllers for data processing in relation to the registration process are Fanatics Italy s.r.l and ACF Fiorentina S.r.l a socio unico, with registered office in 50012 Bagno a Ripoli (FI) – Via Pian di Ripoli, 5 [<https://www.acffiorentina.com/it/altri/policy>], which coordinate marketing and sales initiatives, with Fanatics Italy s.r.l responsible for distributing this policy both in relation to ACF's ownership and in providing updates on registered users.

ACF Fiorentina S.r.l. has appointed a Data Protection Officer who is charged with the task of monitoring compliance with legislation on the protection of personal data. Their contact details are: rpd@acffiorentina.it

11 RIGHTS OF THE DATA SUBJECT

The data subject has the right:

- > to request access to, amendment or deletion of personal data from the data controller (if it is no longer required, is incomplete, incorrect or collected in violation of the law) or to limit or oppose the processing of their personal data;
- > to receive or transfer any information concerning them to themselves or a third party appointed by them in a structured format if the processing is carried out by automated (computerised) means;
- > to withdraw their consent at any time to data processing carried out on this basis (without prejudice to the lawfulness of the processing based on consent given prior to its withdrawal);

- > to lodge a complaint if the response to their requests is not satisfactory or if considered necessary with the Guarantor for the Protection of Personal Data (<http://www.garanteprivacy.it/>): Piazza Venezia 11, 00187, Rome; telephone switchboard: (+39) 06696771; email: protocollo@gpdp.it; certified mail: protocollo@pec.gpdp.it

To assert their rights, they can contact:

- > Fanatics Italy s.r.l at the email address customercare@fiorentinastore.com with regard to processing related to the website registration process and product sales;
- > Fanatics Italy s.r.l at the same address listed in the previous point and/or ACF Fiorentina S.r.l. at the email address infoprivacy@acffiorentina.it, by sending a certified letter to the address indicated above or by calling (+39) 05551259 and explaining the nature of the request or problem to the operator.

Data subjects should be aware that it will not be possible to respond to requests where there is uncertainty about the identity of the claimant.