

## **JUVENTUS CAMP PRIVACY POLICY**

*in accordance with Article 13 of Regulation (EU) 2016/679*

This privacy policy describes the processing of personal data entered or collected on the website [camp.juventus.com](http://camp.juventus.com) (“Website”), or provided through other channels, for the purposes of and during participation in the initiatives presented through the Website (hereafter, the “Juventus Camps”).

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### **1. Definitions**

**Application.** Application means a programme or a service managed by Juventus (or on behalf of Juventus) which can be displayed in various environments and online, mobile or other platforms, including those managed by third parties, allowing us to interact directly with users.

**Special categories of personal data.** Special categories of personal data means 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.

**Personal data.** In accordance with Regulation (EU) 2016/679, “any information relating to a data subject, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

**Parents.** The term parents means those who exercise parental responsibility over the Minor.

**IP Address.** The IP address is associated with the access point through which the internet connection is made and it is usually controlled by the user's Internet Service Provider (ISP).

**Data Subject.** The data subject is the natural person to whom the personal data refer, identified or identifiable, namely the person who can be identified indirectly, by referring to distinctive elements or information or by cross-referencing multiple elements of personal data.

**Juventus Camps.** Summer football courses, in groups, of weekly/two-weekly duration organised by Juventus and offered via the Website.

**Minors.** Persons who have not yet reached eighteen years of age.

**Data Processor.** The data processor is a natural or legal person who carries out the processing of personal data on behalf of one or more data controllers and is authorised to execute the data processing solely in accordance with the instructions provided by the data controller.

**Data Protection Officer.** The Data Protection Officer (DPO) is the person envisaged by Art. 37 of Regulation (EU) 2016/679. The DPO is a person designated by the data controller or data processor to provide support and monitoring, advice, training and information on the application of the Regulation itself. The DPO cooperates with the Authority and serves as a point of contact, including for the data subject, for matters related to personal data processing.

Data Controller. The natural or legal person who determines the purposes and means of personal data processing.

Website. The website [camp.juventus.com](http://camp.juventus.com)

## **2. Data Controller and Data Protection Officer (DPO)**

The Data Controller is Juventus F.C. S.p.A. with registered office in Via Druento 175 - 10151 Turin (hereafter "Juventus").

Juventus has appointed a Data Protection Officer (DPO), who can be contacted at the following e-mail address: [privacy@juventus.com](mailto:privacy@juventus.com).

## **3. Type of data collected**

Juventus collects personal data and special categories of data likely to reveal the state of health.

In particular, in order to be able to carry out activities necessary for managing relationships with those who participate in the initiatives presented through the Website, the following categories of personal and special data are collected:

- details of the transaction made when purchasing a Juventus Camp package on the Website, including information on the purchased services; information on the payment methods, name, surname, email address and telephone number of the Purchaser, name, surname, email address and telephone number of the Parent, identification details of the participant Minor (name, surname, date and place of birth, tax code, address); data of the Participant collected after the conclusion of the contract necessary to provide the services (including height and weight details necessary to determine the size of the kit and details of age and role necessary to form homogeneous training groups). The provision of the data is an essential prerequisite (for mandatory data) or a useful element (for optional data) for entering into and managing the contract for the provision of services related to the Juventus Camp and for all consequent operations;
- images (photos and/or videos) taken and/or recorded during the Juventus Camps by the Data Controller;
- usage, viewing and technical data, including the device identification code or the IP address of the user, the time when the user visits the Website, uses our applications or opens our e-mail messages;
- data relating to the state of health of the participant Minor at the Camp, collected from medical certification and through the compilation of the registration form or following an accident;
- data relating to the state of health of the Minor or of relatives in cases of cancellation of the camp regulated in the General Terms and in the Early Cancellation (if signed).

## **4. Purpose of processing, nature of provision, legal basis and duration of processing**

- The processing of personal data (including their registration in the Juventus databases) is aimed at achieving the following **purposes**:
  - a) to guarantee the correct performance of the services requested from Juventus via the Website and to provide assistance; therefore, to fulfil correctly and promptly all obligations deriving from the contractual relationship established (including technical training, administration of meals, entertainment in free time, provision of the kit). The legal basis for this processing is the need to execute a request received from the data subject or to comply with legal or contractual obligations. The data will be stored for the duration of the contractual relationship;**
  - b) for administrative and accounting purposes, to send communications to the user regarding transactions carried out with Juventus and the conclusion of the contract. The legal basis for this processing is the execution of contractual or legal obligations. The data will be stored for 10 years from the date it was collected;**
  - c) to comply with regulations and legal provisions, including tax laws, or to execute an order from a judicial authority or from the police or a supervisory body. The legal basis for this processing is compliance with legal obligations to which Juventus is subject. The data will be stored for ten years from the date it was collected.**

In all cases illustrated above in points a), b) and c), the personal data are necessary to pursue the aforementioned purposes; if the data subject does not intend to provide the necessary personal data based upon what has been stated above, this means that it will be impossible to conclude and execute the contract and to benefit from all services for which the provision of data is technically and contractually necessary.

- The processing of data relating to state of health, provided in the context of operations essential to ascertain the physical fitness to participate in sporting activities (such as medical certifications and registration form), for the administration of meals, to manage accidents, or to exercise the right of withdrawal in the circumstances of cancellation regulated by the General Terms and by the Early Cancellation (if signed), is aimed at achieving the following purposes:
  - d) for participation in sporting activities, to comply with obligations deriving from the contractual relationship and to comply with the requirements laid down by law, for insurance purposes and for health assistance purposes. In accordance with the regulations in force, data likely to reveal the state of health, being a special category of personal data, may only be processed with the explicit consent of the data subject for the specified purposes. The provision of data is necessary and any refusal to provide those data may result in the total or partial failure to execute the contract. The legal basis for this processing is consent. The data will be stored for ten years from the termination date of the contractual relationship.
- In respect of the legislation in force on personal data protection in the context of Regulation (EU) 2016/679 and the choices of the data subject, the Parent's email address may be processed for the following purposes:
  - e) for sending commercial communications relating to products and/or services similar to the Summer Camps or closely related to the Summer Camps (such as, for example, initiatives reserved to Participants and/or their relatives). The legal basis for this processing is the consent of the data subject (in this case, the Parent). Those data will be stored for 24 months from the date of consent, unless they are erased earlier if the Minor exceeds the age established for participating in the Camps.
- Furthermore, the Participant's personal data, including the individual's voice, image and portrait, acquired by way of photographs and/or videos and recording of the same during participation in the Juventus Summer Camp, may be processed, subject to consent:
  - f) for publishing purposes in relation to publishing initiatives created by the club's official communications offices (in any language), for archiving purposes, for commercial purposes (such as to create a DVD as a memory for Participants at the Juventus Camp), for promotional and advertising purposes, with freedom of use on any medium: promotional material, periodic publications or magazines, internet, social media, TV, etc. These data (photo and/or video images) will be disseminated in any form on the Website, on social networks, mobile apps, TV, and on any other means of communication, ensuring that rights relating to honour and reputation are respected.

In all the cases illustrated above at points d), e) and f), the data may be processed only if specific consent is granted for each of the purposes listed above. Any failure to indicate consent will be considered a refusal.

By providing optional consent, therefore, the data subject specifically acknowledges and authorises these processing activities. In any case, even if the data subject has given consent to pursue the aforementioned purposes, he/she will be free to withdraw that consent at any time, by sending a clear communication to that effect to Juventus to the following e-mail address: [privacy@juventus.com](mailto:privacy@juventus.com). Any refusal will not have any consequence on the provision of the service and participation at the Juventus Summer Camp.

## **5. Categories of recipients, communication and dissemination of data**

For the purposes listed above, the personal data collected may be communicated and/or processed:

- by employees and collaborators of Juventus, in their capacity as officers authorised to process (known as "Processing Officers"), as part of their respective duties and in compliance with the instructions received. Those individuals must, in any case, comply with obligations of secrecy and confidentiality;
- by external trusted entities to which Juventus assigns a number of activities or part of them, according to the provision of the services offered via the Website (e.g. hosting services, companies that deal with maintaining the Website and the Applications, project managers, programmers, system engineers and database administrators, or whose activity is connected to, instrumental to or in support of Juventus (e.g. entities to which Juventus may entrust customer care activity; entities involved in the organisation and administrative and technical management of the services, companies that perform communication services by way of automated systems). In this case those entities will be appointed as Data Processors or will in any event be designated as entities authorised to process the data in accordance in the forms and methods envisaged by the legislation in force;
- by all entities (including Public Authorities) that have access to the personal data by virtue of regulatory or administrative measures in the capacity of autonomous controllers;
- by banks and companies that manage national and international payment circuits through which online payments are made for the products purchased via the Website in the capacity of autonomous controllers;
- by insurance companies that provide accessory cover connected with the services purchased in the capacity of autonomous controllers.

Personal data concerning the state of health may be processed, in respect of the law and the will of the data subject, by the following entities:

- by doctors and healthcare staff employed at the Juventus Camp to provide healthcare assistance for sporting activities;
- by persons who need to access the data for purposes accessory to the contractual relationship, within the limits strictly necessary for carrying out the accessory tasks or for providing accessory goods and services (for example: management company of the Website and online registration system, customer care service, insurers).

Juventus has appointed the company Holiday System S.r.l., based in Via del Garda 44-bis int. 15 – 38068 Rovereto (TN), tel. +39 0464 423854 fax +39 0464 401091, as manager of the Website and the IT platform for online registration, as well as provider of the service of managing registration and customer care activities, external Data Processor, which can be contacted by the data subject by writing to [camp@juventus-academy.com](mailto:camp@juventus-academy.com).

On the other hand, the personal data will not be communicated to third party companies for them to send commercial and marketing communications, for which additional and specific consent would be required. The personal data will not be disseminated except when recordings (photographs and/or videos) are taken of the camps, to be disseminated by the methods indicated in point 4, letter f) of this privacy policy, subject to express and prior consent issued by signing the specific disclaimer.

## **6. Method of data processing**

The data processing will mainly be performed using IT tools, in compliance with appropriate protective measures to guarantee data security and confidentiality. In particular, security measures of technical, IT, organisational, logistical and procedural nature have been implemented to prevent the loss of data, unlawful or inappropriate use of data, and unauthorised access to the same.

## **7. Possible indication by the data subject of third parties' personal data**

In specific cases where the user must provide data of third parties in the registration process to the camp or for the purposes of operational fulfilments connected to the camps, or for the exercise of the right of withdrawal indicated in the Early Cancellation, the indication of the data of that third party equates to certification of having received (from the interested party) authorisation to provide his/her data to Juventus, thus indemnifying and holding Juventus harmless from any claims or complaints that may be received by Juventus from that person.

## **8. Transfer of personal data to countries not belonging to the European Union**

In general, we manage and store personal data on servers located within the European Union. If personal data is stored in the cloud, the providers of that service, appointed as data processors, will be asked to store the data on servers located in the European Union.

If, as part of the processing described in this privacy policy, our activity involves the transfer of personal data to third parties located in countries outside the European Union other than Iceland, Liechtenstein and Norway or those countries for which the Commission has adopted an adequacy decision (<https://www.garantepriacy.it/temi/trasferimento-di-dati-all-estero>), we will adopt all organisational and contractual measures appropriate to safeguard the personal data, asking those third parties to sign a contract according to the standards of the European Union (namely in compliance with Commission Implementing Decision 2021/914 of 04/06/2021).

## **9. Privacy of Minors**

In conformity with the applicable laws, the Parent must provide consent to the processing of the Minor's personal data. The Parent is therefore the person entitled to exercise the rights granted by the regulation to data subjects in any case of processing of the Minor's data.

## **10. Rights of the data subject**

All data subjects have the right to contact the Data Controller to request access to their personal data and the rectification or erasure of the same or the restriction on processing relating to them or to object to their processing and to exercise the right to data portability (Articles 15 et seq. of EU Regulation 2016/679). The data subject also has the right to withdraw his/her explicit consent at any time, if provided, for the specific purpose of sending commercial communications, without prejudice to the lawfulness of the processing based on the consent provided prior to the withdrawal.

To exercise those rights, the data subject may:

- send a request via the contact form on the website [www.juventus.com](http://www.juventus.com)
- send an email to the address of the Data Controller: [privacy@juventus.com](mailto:privacy@juventus.com).

An updated list of Data Processors can also be requested from the aforementioned email address.

Furthermore, each data subject always has the right to lodge a complaint with the Data Protection Supervisory Authority in the forms, methods and within the limits envisaged by the legislation in force in accordance with Regulation (EU) 2016/679. In that case, the data subject should contact the DATA PROTECTION SUPERVISORY AUTHORITY. All useful information can be found on the website [www.garantepriacy.it](http://www.garantepriacy.it) and the forms can be accessed from this link:

<https://www.garantepriacy.it/home/modulistica-e-servizi-online>

## **11. Amendments to this privacy policy**

Occasionally, we may amend this privacy policy in order to include new technologies, industry practices and regulatory requirements, or for other purposes. We will inform the user with respective notification if such amendments are significant and we will obtain the consent of the user if envisaged by the laws in force.

**Last update:** 7 March 2022