

## PRIVACY

**POLICY ON PERSONAL DATA PROCESSING according to Article 13 of EU Regulation 2016/679, General Data Protection Regulation ("GDPR") and to Italian Legislative Decree no. 196/2003, Italian Data Protection Code ("Privacy Code")**

**Version – 25 May 20018**

Dear Sir, dear Madam,

The present policy is made available for the website [www.ticketone.it](http://www.ticketone.it), owned and managed by the company TicketOne S.p.A., having registered office in Milan, Via Vittor Pisani n. 19 (hereinafter, "**TicketOne**" or the "**Company**"), as Data Controller, and not also for third parties websites eventually consulted by the user through link.

The present information is also applicable to the processing of personal data through the following websites owned and/or operationally managed by TicketOne [shop.ticketone.it](http://shop.ticketone.it), [www.listicket.com](http://www.listicket.com), [sport.ticketone.it](http://sport.ticketone.it), [www.tosc.it](http://www.tosc.it), [www.ticket4art.it](http://www.ticket4art.it), and through the "TicketOne" apps of the Company. Future additions or amendments to the list will be properly notified to you. The website [www.ticketone.it](http://www.ticketone.it) and other websites corresponding to the indicated domain names, as subsequently modified or supplemented, and mobile apps will be hereinafter individually referred to as "**Website**".

The policy is addressed to all parties who interact with the pages of the Website, both those who use the Website without completing any registration, and those who, at the end of an appropriate procedure, register themselves to the Website and use the online services carried out through it. The present policy is provided according to the art. 13 of the GDPR and of the Privacy Code regarding personal data protection, as applicable in accordance with the GDPR, as well as according to the Recommendation n. 2/2001 that the European Authorities for the Personal Data Protection, convened in the Group established by the art. 29 of the Directive n. 95/46/CE, have adopted on 17th May 2001 in order to individuate some minimum requirements for the on line collection of personal data, and subsequent amendments and additions

### **Registration**

The information and the data requested in case of registration will be used both to allow You to access to the reserved area of the Website and use the on line services offered by TicketOne. The personal data of the registered users will be treated for the purposes and according to the modalities of the present information.

### **Orders**

In case an order is completed, some data - are registered, e.g. the IP address the transaction comes from, the time of the request, the type of browser used, etc.. This data might be used in order to verify the responsibility in case of hypothetical IT crimes to the Website and/or third parties, upon initiative of the inquiring authorities in charge by law.

### **Marketing**

Subject to your agreement, TicketOne may treat personal data provided by Your side for the shipment of advertising material on the products and/or services offered by TicketOne or by third parties.

### **Profiling**

Personal data provided by Your side during a purchase on the Website may be treated by TicketOne, subject to Your agreement, with the aim of profiling, that is the survey of your consuming habits through the identification of type and frequency of the purchases made by Your side, in order to send You advertising material on the services offered by TicketOne or by third parties having specific interest for You.

### **Soft spamming**

TicketOne may use, for the purpose of providing direct ticketing services through the Website, email contact information provided by Your side during a purchase session on the Website, also without Your agreement, according to art.130, paragraph 4, of the Privacy Code, only if the service provided is comparable to those subject of the previous sale (i.e. soft spamming). You may however oppose to this processing at any time by sending a request to TicketOne as indicated in the art. 10 below.

### **Cookie**

Various software solutions are used to optimise the online services. These solutions allow website usage to be analysed and valuable information about the needs of users to be gathered, so that the user-friendliness and quality of the online services can be continuously enhanced. In order to perform such analyses, aggregated and anonymous statistical data related to the browser used, the number of visits/page impressions and the browsing behaviour of the respective visitor are captured. The shortened IP address of the visitor may also be viewed in the course of data gathering and processing.

The data are analysed for the following purposes, in particular:

- counting the number of visitors
- tracking those areas of the website that are particularly attractive for the respective visitor
- analysing where visitors are from, in order to optimise the services provided
- adapting recommendations to specific target groups

This process involves the use of cookies. Cookies are small text files that websites visited by users send to their terminals, where they are stored before being transmitted back to the same sites on their next visit. For further information about definition of cookie, terms of use and opting out, please check our **cookie policy**.

Please find below the list of the main software solutions deployed (by clicking the respective provider below, the user will be redirected to the opt out option):

- AT Internet [www.xiti.com/it/optout.aspx](http://www.xiti.com/it/optout.aspx)
- Criteo [www.criteo.com/it/privacy/](http://www.criteo.com/it/privacy/)
- Google [www.google.com/settings/ads](http://www.google.com/settings/ads)
- Facebook [www.youronlinechoices.com/it/le-tue-scelte](http://www.youronlinechoices.com/it/le-tue-scelte)
- Il Sole 24 Ore [du.ilsole24ore.com/utenti/privacyfiles/informativa\\_cookies.html](http://du.ilsole24ore.com/utenti/privacyfiles/informativa_cookies.html)
- CTS EVENTIM AG & Co. KGaA [isi-tracking.eventim.com/optout\\_itt?language=it](http://isi-tracking.eventim.com/optout_itt?language=it)
- Google Analytics [tools.google.com/dlpage/gaoptout?hl=it](http://tools.google.com/dlpage/gaoptout?hl=it)
- Tag Commander [www.commandersact.com/it/](http://www.commandersact.com/it/)
- Twitter [twitter.com/personalization](http://twitter.com/personalization)

Please note: Opting out is done using a cookie. If that cookie is deleted, the opt-out option must be reactivated.

To check further types of software solutions provided on the website, and related opt out options, we invite you to read our **cookie policy**.

### **INFORMATION FOR THE PROCESSING OF PERSONAL DATA according to the art. 13 of the GENERAL DATA PROTECTION REGULATION AND ACCORDING TO THE PRIVACY CODE.**

The registration to the Website owned and managed by TicketOne and the eventual subsequent use of the services rendered by TicketOne through the Website, including the reservation, purchase, issuing and ticket shipment (so-called "ticketing service") and the information service on the events on sale, the sale opening dates and further information on such events will involve the processing of personal data regarding You. Therefore, according to the prescriptions of the EU Regulation 2016/679, General Data Protection Regulation (so-called "GDPR") and the Privacy Code regarding data protection, if and to the extent applicable, herewith

we intend to inform You that the Company, as owner of the Website and Data Controller, will treat the personal data regarding You under the following conditions.

### **Art. 1. Type of personal data**

In addition to everything else provided in the above paragraphs (in particular under the item “Orders”, “Profiling” and “Cookie”), please be informed that through the Website and the use of the related functionalities and/or sign up for the services set out therein we can collect and process for the following purposes:

- common personal data and identifiers, such as name, surname, address or other contact details, date of birth;
- data related to or arising from the use of the Website, such as IP addresses or personal computer domain names used by users connecting to the Website, URI addresses (*Uniform Resource Identifier*) of requested resources, time of request, method used for the submission of the request to the server, dimension of the file obtained in reply, code number indicating the status of the request provided by the server (successful completion, error, etc.) and other parameters related to the operating system and the user’s IT environment;
- data related to the order and to the purchasing process;
- data related to preferences shown with reference to or in occasion of certain purchases and/or as a result of the sign up for specific services (such, for example, for the “Ticket Alert” service)

For the purposes indicated in the present information, the Company does not collect personal data attributable to a Customer that the GDPR qualifies as “special categories” (such as, for example, data revealing racial or ethnic origin, religious, philosophical or other beliefs, political opinion, associations or other religious or philosophical organisations membership or trade union membership and data revealing the health status of the interested subject) or data on criminal convictions and offences.

### **Art.2. Legal ground and purpose of the processing**

The processing of the personal data (including their registration in the data sheets of the Company) is based on the existence of a contractual or legal obligation or, according to the circumstances and as further detailed in the following paragraph, on the existence of a legitimate interest of TicketOne or on its consent, optional and revocable at any time, and it is aimed exclusively at reaching the following purposes:

**a) to perform contractual obligations (Article 6 (b) GDPR)** – for the purpose of granting the registration to the Website and the **correct provision of the services requested to TicketOne** through the Website and/or through forms and tools provided therein, including the ticketing service and the newsletter service, and, therefore, filing in a correct and punctual way any obligations arising from the relevant pre-contractual and contractual relationships entered into with You. **Administration and accounting purposes** related to and arising from the contractual relationship entered into with You, also with regard to the eventual transmission by e-mail of commercial invoices by TicketOne and/or companies associated to it in the provision of the ticketing service (including, by way of example, the reimbursement procedure of the corresponded price and the issue of a credit note as a consequence of the cancellation of a purchased event) are expressly included. The service provided by the Customer Care and, therefore, the processing of user’s personal data for the management and sending of replies to requests of assistance related to one or more of the services offered on the Website falls within the scope of this processing purpose and legal ground;

**b) to perform legal obligations (Article 6 (c) GDPR)** – for the fulfilment of obligations arising from national and/or European laws or regulations in force, in particular, in the Tax and public security areas, in the area of “secondary ticketing” and from provisions of the competent entities and authorities.

**c) on the basis of a legitimate interest of TicketOne (Article 6 (d) GDPR)** consisting of legal defence of a right or interest under any competent authority or entity, expressly included therein for the purpose of credit recovery; in order to allow the direct offer by TicketOne of products or services similar to the ones already purchased (so-called soft spamming), with limited reference to the email address that You provided in the context of purchasing of a service through the Website, unless You oppose to such processing; for the organisational management of the event purchased or of the related services such, by way of example, to inform about possible cancellations or delays of the date of the purchased event, about how to access or participate to the event, how to submit a request for reimbursement in case of event cancellation; for the

identification of the satisfaction level of the customers with the quality of provided services and with the activity carried out by TicketOne and the statistical analysis and market research performed on aggregate data;

**d) on the basis of Your consent (Article 6 (a) GDPR)** – for purposes closely connected with the activity carried out by TicketOne, such as:

d).1 for sending advertising material on TicketOne's and/or third parties' products and/or services, through -automated system, such as e-mail, fax, sms or MMS, or by traditional means (paper mail) (so-called **marketing purposes**.)

d).2 for the elaboration of Your commercial profile through the survey and processing of Your choices and buying behaviour on the Website, aimed both to monitor the satisfaction level of the customers in order to ensure a better satisfaction of their needs, and to send – through automated systems, such as e-mail, fax, sms or MMS or by traditional means (paper mail) – advertising material related to TicketOne's products and/or services having specific interest for You (so-called **profiling purposes**).

### **Art. 3. Provision of data and consequences in case of missed provision**

The provision of the data for the purposes indicated at points a) (**performing of contractual obligations**) b) (**performing of legal obligations**) and c) (**TicketOne's legitimate interest**) of Article 2 above is purely optional. However, since the processing for such purposes is necessary in order to allow the registration to the Website and to consent to TicketOne to carry out the services offered through the Website, including the ticketing service and the newsletter service, Your missing, partial or incorrect provision of data will prevent, according to the circumstances, the registration to the Website and the use of the online services offered by TicketOne through the Website and, in general, the execution of the contractual agreement entered into and/or the fulfilment of the obligations provided by the contract or by the applicable law or the process of Your specific requests or, further, will lead to the impossibility for the Company to ship to You generic information regarding products or services similar to the ones that were already purchased by You, will prevent the carrying out of market research, also intended to assess the user's satisfaction level and therefore improve the services or anyhow pursue its legitimate interests (i.e. legal defence).

With reference to the purposes of the processing indicated at points d).1 and d).2 (**consent**) of Article 2 mentioned above (marketing purposes and profiling purposes), we point out that the provision of Your data is purely optional and that the related processing is based on consent, optional and subject to withdrawal at any time. The lack of provision will not determine any consequences with respect to the registration to the Website and to the use of the services offered by TicketOne through the Website, including the opportunity to purchase through the Website, and will only determine the consequences described below.

- Lacking your consent for processing of the data for the purposes indicated at point d).1) of Article 2 above (marketing) You will not receive advertising material related to the products and/or services offered by TicketOne and/or third parties;
- Lacking your consent to the processing of Your data for the purposes indicated at point d).2 of Article 2 above (profiling) our Company will not be allowed to elaborate Your commercial profile, through the survey of Your choices and buying behaviour on the Website (also aimed to granting a major satisfaction of the needs of the customers and the continuous improvement of the services offered), as well as to send You advertising material on products and/or services of TicketOne and/or third parties, of Your specific interest.

Without prejudice to the above, it is intended that, in case of not acceptance by Your side of the agreement to the processing of Your personal data for the purposes set forth at point d) of Article 2 above, our Company will anyway be able to use Your data only in order to correctly meet the obligations arising from the laws in force as well as to comply to the obligations arising from the contractual relationship between You and the Company and/or for the pursuing of a legitimate interest, as indicated at points a), b) and c) of the Article 2 above.

In any case, You will be able to revoke the consent possibly given for the purposes set forth at points d).1) and d).2 of Article 2 above (marketing purposes and profiling purposes) at any moment, by accessing to "My

TicketOne” section, “My Data” area of the Website or through the “Privacy Settings” box, available during the purchase procedure.

Please be aware that **any subsequent withdrawal of consent will not be of prejudice for the lawfulness of the processing carried out before withdrawal.**

Moreover, with respect to the purpose set forth at point c of Article 2 above (so-called soft-spam), we remind You that You may object to the processing of Your data, by sending an email to the following address: [privacy@ticketone.it](mailto:privacy@ticketone.it).

#### **Art. 4. Profiling - Processing modality**

As indicated at paragraph 2 point d).2, TicketOne may carry out profiling activity on users.

Such purpose of the processing is pursued by collecting and treating individual data and/or identifiers (personal details, contact details) and associating or crossing them with interest or purchasing preferences (in relation to, e.g. musical genres, artists, events and, in general, to the type of purchases or the sign up for certain services) and/or other macro-indicators, such as geographical distribution, age group, sex (male or female).

The data can be (i) provided directly from the user in the context of the registration to a specific service and, therefore, for the purpose of receiving information related to their interests, or (ii) collected and processed on the basis of browsing preferences, also through cookie and other identifiers (crossed with the above other data), or on the basis of interests shown during the purchasing or registration process, also through the use of specific algorithms.

Profiling may be carried out also on the basis of aggregate data inferred from individual personal data. Nevertheless, it is not possible to exclude that the data used for such purpose, even in aggregate form, allow the identification of data subjects.

The processing of the personal data regarding You will basically be effected through electronic, also – automated ways, according to the modalities and with the instruments eligible to grant the safety and the confidentiality of the data. In particular, there will be the adoption of all the technical, IT, organizational, logistical and safety procedural measures, so that an adequate protection level of the data as prescribed by law is granted, allowing the access only to the persons authorised to carry out the processing by the Controller or by the Processor appointed by the Controller. The information received and the processing modalities will be coherent and not exceeding compared to the kind of services rendered.

The data will also be managed and protected in an environment whose access is under constant control.

#### **Art. 5. Data communication and disclosure**

Your data can be communicated to the following categories of subjects (“recipients”):

- a) to all those parties (including the Public Authorities) having access to the personal data according to law or administrative provisions;
- b) to third companies whose services are proposed or sold through the Website (and, in particular, to companies or promoters of concerts, shows, sport or any other events whose tickets are sold through the Website), as far as it concerns the management and verification of the entrance and the entrance titles at the events;
- c) to banking institutions and to companies managing the national or international payment circuits the on line payments of the products bought through the Website are effected through;
- d) to all those public and/or private parties, individuals and/or legal entities (Bailiffs, Chambers of Commerce, Law Chambers and Offices, etc...), should the communication be necessary or functional to the correct filing of the contractual obligations arose, as well as of the by-law obligations.

Data regarding you will only be disclosed in an anonymous and aggregated ways for statistical or research purpose.

In addition to the above, in order to pursue the purposed set out in Article 2 above, personal data may be disclosed to third parties operating on behalf of TicketOne, such, by way of example and not limited to,

- to the companies or third parties providing printing, enveloping, shipment and delivery services of tickets purchased through the Website;
- to couriers and shippers responsible for the delivery of the products purchased through the Website;
- to companies, consultants or professionals eventually in charge of the set-up, maintenance, updating and, in general, the management of the hardware and software owned by TicketOne or used by the Company in order to provide its services;
- to companies or internet providers in charge of sending documentation and/or information material;
- to other companies belonging to the Group, located in Italy or abroad, within the European Union, that may process the data only as external data processors on behalf of TicketOne.

An updated list of the subjects appointed as data processors is available at TicketOne premises.

In any case personal data referred to in Article 1 will not be transferred to extra-EU Countries or outside the EEA.

#### **Art. 6. Data Controller and Data Protection Officer**

The Data Controller is the company TicketOne S.p.A., having its registered office in Milano, Via Vittor Pisani n. 19.

All instances and requests related to the processing of the personal data regarding You can be addressed to the Holder, to the following addresses:

- a) TicketOne S.p.A., via Vittor Pisani n. 19 - Milano (Italia);
- b) e-mail address: [privacy@ticketone.it](mailto:privacy@ticketone.it);
- c) fax number: (+39) 02.3922.670.

The Company has appointed a Data Protection Officer, who can be contacted for any issue related to the processing of personal data at the address above or via email at [privacy@ticketone.it](mailto:privacy@ticketone.it).

#### **Art. 7. Personal data retention**

The personal data regarding you will be archived only for the time necessary to grant the correct provision of the services offered by our Company and, in particular, according to the following:

- In case of cancellation, exclusion or revocation of the enablement for missed use of Your account on the Website, Your data will be archived for administration purposes for a period not higher than a quarter, with the exclusion of eventual specific by-law obligations regarding the archive of accounting documentation or for public safety purposes. In such cases, there will be the guarantee of the cancellation of the data also by Data Processors the data were eventually communicated to.
- In any case, it is intended that Your personal data will be processed for the purposes set forth at points d).1 (marketing purposes) and d).2 (profiling purposes) of Article 2 above for the period of time allowed by law and by the prescriptions of the Data Protection Authority (Supervisory Authority), and thus for a 24-month period as of the registration, when the consent for marketing purposes was originally given and/or the date of its renewal, and for a 12-month period as of the registration, when the consent for profiling purposes was originally given and/or renewed.

More in particular, please be aware that:

- after 24 months Your personal data shall no more be processed for the purpose set forth at point d).1 of Article 2 above; and
- after 12 months, Your personal data shall no more be processed for the purpose set forth at point d).2 of Article 2 above,

save that, should You newly give Your consent for one or both of such purposes, Your data, also related to orders history – as previously obtained and stored for the purposes set forth at points a), b) and c) of Article 2 above - may be used again for the profiling purpose set forth at point d) of Article 2 above.

- Without prejudice to the above, user's data will be processed and retained for the whole duration of the contractual relationships and, subsequently, for the time required by the applicable law on data protection and/or according to the related statutory or time limitation periods and, in general, for the time necessary for the exercise/defence of the rights of TicketOne in relation to claims raised by public authorities, public entities and private subjects.

#### **Art. 8. Consent and Consent Renewal**

Please note that **consent to the processing, where required and provided, may be withdrawn at any time** also in relation to processing activities for which consent was acquired prior to the publishing or delivery of the present Policy. **The withdrawal of consent is only valid for the future and will not affect the processing carried out before such withdrawal.**

Moreover, please pay attention to the fact that, during the purchase procedure, You may modify Your preferences on personal data processing, through the "Privacy Settings" box, by giving the consent to the data processing for marketing and/or profiling purposes, if not already given, or by revoking the previously given consent, if any.

Please remember that, should You not proceed to modify the preferences on data processing indicated in the above-mentioned box, by clicking on the "Save and proceed with payment" button, you will confirm such preferences. As a consequence, in the event that You have already given Your consent to the processing of Your data for marketing and/or profiling purposes, You will renew the consent previously given, to all effects, including the storage duration.

#### **Art. 9. Minors under 16**

The Website does not contain any information or functionality or service directly offered to users under the age of 16.

Minors shall not provide information without the consent of the holder of parental responsibility.

TicketOne therefore invites any user under the age of 16 to avoid any communication of personal data without prior authorisation by a parent or by the holder of parental responsibility. In case the Company will be notified the fact that personal data have been provided by a minor under the age of 16, the Company will immediately delete such data and request appropriate consent by the parents (or by the holder of parental responsibility), reserving the right to prevent any access to the service offered in the Website to any user who hid his/her minor age or who communicated personal data without consent by the parents (or by the holder of parental responsibility).

#### **Art. 10 Rights of data subjects**

As a data subject, You have the following rights:

- |                               |   |
|-------------------------------|---|
| <b>Right to access</b>        | You may ask whether or not Your personal data are processed and, if so, receive access to that data and to specific information on the processing, such as information on the purposes, on the categories of personal data concerned, on the existence of other rights as set out below. You may also request copy of Your personal data.                     |
| <b>Right to rectification</b> | You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, inaccurate personal data will be corrected and incomplete personal data will be completed.  |
| <b>Right to erasure</b>       | You have the right to have Your data erased without undue delay, if (i) such data are no longer necessary in relation to the initial purposes for which they were collected, (ii) You withdraw Your consent, on which the processing was based (unless there is another legal ground on which the processing is based), (iii) You object to the processing of |

Your data (as indicated below) and there is no other legitimate and prevailing reason for processing or you object to the processing of Your data for marketing purposes or for profiling purposes aimed at carrying out marketing activities, (iv) Your data are unlawfully processed, (v) personal data of a minor under the age of 16 have been collected in relation to an offer of services addressed to the information society.

Please note that the right to erasure does not apply if the processing is necessary for, among other purposes:

- For the performance of a legal obligation;
- For the establishment, exercise or defence of legal claims.

**Right to restriction of processing**

You have the right to obtain the restriction of the processing of personal data, in case of:

- the accuracy of personal data was contested within the period of time necessary to the Controller (the Company) in order to verify the accuracy of such data;
- the processing is unlawful and You request restriction instead of erasure of processing;
- You need the personal data in order to assess, exercise or defend a right;
- You object to the processing, as indicated below, and wait for the assessment on the prevailing of the legitimate interests of the Controller.

**Right to data portability**

You have the right to request and receive personal data in a structured, commonly used and machine-readable format and to transmit the data to another Controller in case the processing is based on consent or relates to special categories of personal data processed on the basis of consent or the processing is based on the execution of a contract and it is carried out by automated means.

You also have the right to obtain direct transmission of data from one Controller to another, where technically feasible.

It remains the possibility of obtaining the erasure of data, as indicated above.

**Right to object**

You have the right to object at any time to the processing based on a legitimate interest of the Controller, unless the Controller can demonstrate legitimate and mandatory grounds for processing that prevail on the interests, rights and fundamental freedoms of the data subject.

Moreover, You have the right to present a claim before the Supervisory Authority.

The above rights can be exerted with request made without any formality to the Controller. The request can be sent to the Controller via paper mail or e-mail to the following addresses: Via Vittor Pisani no. 19 – Milan (Italy), email: [privacy@ticketone.it](mailto:privacy@ticketone.it)

TicketOne S.p.A.