

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF PARTICIPANTS IN THE "PENNY VOLLEY CUP" AND "PENNY VOLLEY-CHAMPIONS-LEAGUE" SPORTS EVENT

Pursuant to Art. 13 of Regulation 2016/679 (also known as GDPR) on the protection of personal data and in relation to your personal data, the processing will be based in accordance with the principles of fairness, lawfulness and transparency, as well as the protection of your privacy and the protection of your rights.

We therefore wish to inform you of the processing of your personal data carried out within the framework of the "Penny Volleyball Cup" and "Penny Volleyball-Champions-League" sporting event (hereinafter, also jointly, the "Event") dedicated to all employees of Penny Market S.r.l. and employees of foreign companies belonging to Penny International (hereinafter, also jointly, the "Employees").

IDENTITY AND CONTACT DETAILS OF THE JOINT DATA CONTROLLERS

Penny Market S.r.l. a s. u. subject to the direction and coordination of Rewe Zentralfinanz eG, with registered office in Strada Padana Superiore 11, 2/b, 20063 Cernusco sul Naviglio (MI), Tax Code: 01737790186, VAT No.: 12619750156 (hereinafter "Penny")

Zona Eventi S.r.l. Società Sportiva Dilettantistica with registered office in Viale Argonne, 40, Milan (MI), VAT No.: 06489370962 (hereinafter "Zona Eventi")

The aforesaid Italian companies as Data Controllers, jointly determine the purposes and means of the processing, as better specified in **point A** of this information notice.

In this context, therefore, these companies act as Joint Data Controllers, pursuant to Article 26 of the GDPR and in accordance with a specific internal agreement signed by the parties, which governs their respective responsibilities and obligations (hereinafter "Joint Data Controllers" or "Companies").

The essential content of the agreement, subject to specific request, is available to you at Penny and may be requested by writing to eserciziodirittiprivacy@penny.it.

DATA CONTROLLERS

Penny will autonomously determine the purposes and means of processing better specified in **point B** of this information notice.

Zona Eventi, on the other hand, will autonomously determine further purposes and means of processing better specified in **point C** of this information notice.

In these contexts, therefore, the Companies will operate as **autonomous data controllers**.

CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)

For all matters relating to the processing of your personal data, you may contact Penny's DPO at the following email address: **dpo-penny@kinast.eu**.

DEFINITION OF PERSONAL AND HEALTH-RELATED DATA

For the purposes of the GDPR, Personal data means: “*any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity*”;

For the purposes of the GDPR, health-related data is defined as: “*personal data relating to the physical or mental health of a natural person, including the provision of health care services, which reveal information relating to his or her state of health*”.

DATA SOURCES

The data are collected not only directly from the person concerned (i.e., directly provided by you), but also during the course of the Event.

A. PROCESSING IMPLEMENTED BY PENNY AND ZONA EVENTI AS JOINT CONTROLLERS

1. Processing Activities

1.1 Categories of processed personal data

Registration for the Event is exclusively for Employees in force (hereinafter referred to as "Participants"). In order to ensure registration, participation and management of the Event, the Joint Controllers will process:

- **common data of the Participants:** by way of example but not limited to: name, surname, date and place of birth, fiscal code, details of identity document, residence, e-mail address, mobile phone number, documentation useful to ascertain eligibility for non-competitive sporting activity, name of the team they belong to.

- **Participants' special data:** data relating to the state of health that may be contained in medical certificates for non-competitive sporting activity or in self-certification of fitness for sporting activity. This documentation, which is compulsory for those who play sport with clubs affiliated to the National Sports Federations and CONI, will therefore be handed over by the Participants to Zona Eventi and will be processed exclusively by the latter.

1.2. Purpose of Processing

The processing shall be carried out by the Participants for the purposes related to the registration, participation and management of the Event, including but not limited to: formation of the list of Participants and teams, rankings, sharing of updates and informative material (such as, for example, delays, changes, changes of regulations), online publication of match results.

Registration for the Event takes place only through the Zona Eventi channels (website www.pennyvolleycup.it and - reserved area http://www.zonagoal.com/area_riservata/area_riservata_penny.php, e-mail pennyvolleycup@zonaeventi.com).

Penny shall only verify periodically that all Participants are employees of the Companies involved in the Event.

Such data, anonymised and aggregated, may also be used for statistical purposes including, for example, surveying the percentage of men and women registered for the Event or the number of registered participants from each Region. These analyses are aimed at the general evaluation of the Event.

2. Legal basis of the Processing

The processing of the Participants' data for the purposes described above will be carried out in accordance with the condition of lawfulness set out in **Article 6(1)(b) GDPR**, the processing being necessary for the performance of a contract to which the Participant is a party or for the performance of pre-contractual measures taken in response to a request from the Participant.

The processing of data concerning health that may be contained in medical certificates for non-competitive sporting activity or in self-certification will take place in accordance with the condition of lawfulness set out in **Article 9(2)(g)** in conjunction with **Article 6(1)(c), GDPR**. The processing, in fact, is necessary for reasons of relevant public interest and is necessary to fulfil a legal obligation to which the Data Controller (Zona Eventi) is subject. In particular, reference is made to the Ministry of Health Decree of 8 August 2014 implementing paragraph 2 of Article 42-bis of Decree-Law No. 69 of 21 June 2013, converted, with amendments, by Law No. 98 of 9 August 2013, as amended.

3. Retention period

The data will be processed for the entire duration of the contractual relationship and will be retained for a further period of 1 year from the date of termination of the same, unless required for the defence of one's rights and legal obligations.

B. PROCESSING IMPLEMENTED BY PENNY AS AUTONOMOUS DATA CONTROLLER

1. Processing Activities

1.1 Categories of processed personal data

Penny, for the purposes described in the following paragraph, will process:

- **common data of the Participants:** by way of example but not limited to, personal identification data, personal details and images collected during the event.

1.2. Purposes of Processing

The processing shall be carried out by Penny for the following purposes:

a) to assert and defend its rights (including in court).

b) to transfer some personal data of the Participants to the company MAXFIVE GmbH (formerly Radio Max GmbH), Sponsor of the Event. The above will enable the Sponsor to contact the Participants, interview them and publish the interview on dedicated channels.

In this regard it should be noted that: i) Penny will transfer to the aforementioned company data such as mobile phone numbers, email addresses, images, relating to some Participants; ii) MAXFIVE is a company of the Group to which Penny belongs. The data, therefore, will not be transferred to any third-party company; iii) MAXFIVE will process the data transmitted as independent data controller, independently determining purposes and means.

c) publication and dissemination of the images of the Participants contained in the photos/videos taken during the Event on Penny's online channels. The provision of your personal data for this purpose is optional and the treatment will be carried out on the basis of your consent.

2. Legal basis of the Processing and legitimate interest

a) The processing carried out for the purpose referred to in point a) above will be based on the condition of lawfulness referred to in **Article 6, paragraph 1, letter f), GDPR**, i.e., the legitimate interest of the Data Controller and will be necessary to allow Penny its own judicial and/or extrajudicial protection.

b) The processing carried out for the purpose referred to in point b) above will be based on the condition of lawfulness referred to in **Article 6, paragraph 1, letter f), GDPR**, i.e. on the legitimate interest of the Data Controller and will be necessary in order to carry out these activities as an expression of one's freedom of economic initiative and the desire to publicize the Event.

The legitimate interest relates to the fact that the Data Controller has an interest in pursuing the purposes set out above using the means described. The treatments therefore appear among the reasonable expectations of the user who can freely choose whether to participate in the Event and, in any case, has the right to object.

The interest of the Data Controller is clear and legitimate. The limited and targeted use of the information and the voluntary participation in the Event also contribute to tipping the balance in favor of the legitimate interest of the Data Controller. The interest of the Data Controller, therefore, can be considered prevalent with respect to the interests or fundamental rights and freedoms of the interested party which require the protection of personal data (**Article 6, paragraph 1, letter f, GDPR**).

c) The processing carried out for the purposes referred to in point c) above will take place in accordance with the condition of lawfulness referred to in **article 6, paragraph 1, letter a), GDPR**, as the processing is based on the consent of the interested party

In this regard it is specified that:

- the consent of the Penny Market Srl employees has already been given at the time of hiring through the information on the processing of personal data relating to employees on the Zucchetti portal
- The consent of the employees of the other companies belonging to Penny International may be given with a separate and specific release pursuant to law n. 633 law of 22 April 1941 (Copyright) / information on the processing of personal data pursuant to the GDPR.

The consent may be revoked at any time according to the methods indicated in the paragraph "Your rights". The withdrawal of consent does not affect the lawfulness of the processing based on the consent before the withdrawal.

3. Retention Period

a) The data processed by Penny in order to defend one's rights will be kept for the entire duration of the judicial and/or extrajudicial proceedings and/or executive actions, until the time limits for appeal actions have expired, except for any further legal obligations.

b) the data processed by Penny for the purpose of transfer to MAXFIVE will be kept until the closure of the Event and, therefore, until the purpose for which they were collected is achieved.

c) the data processed by Penny for the purpose of publishing and disseminating the images will be kept in the archives of the Data Controller until the end of use, except for any further legal obligations.

C. PROCESSING IMPLEMENTED BY ZONA EVENTI AS AUTONOMOUS DATA CONTROLLER

1. Processing Activities

1.1 Categories of processed personal data

Zona Eventi, for the purposes described in the following paragraph, will deal with:

- **common data of the Participants:** by way of example but not limited to, personal identification data, personal details.

1.2. Processing purposes

The treatment will be carried out by Zona Eventi in order to assert and defend one's rights (also in court).

2. Legal basis of the Processing and legitimate interest

The processing carried out for the purpose referred to in the previous point will be based on the condition of lawfulness referred to in **Article 6, paragraph 1, letter f), GDPR**, i.e., the legitimate interest of the Data Controller and will be necessary to allow Zona Eventi its judicial and/or extrajudicial protection.

The legitimate interest is related to the fact that the Data Controller has an interest in pursuing the purposes set out above using the means described. The treatments therefore appear among the reasonable expectations of the user who can freely choose whether to participate in the Event and, in any case, has the right to object.

The interest of the Data Controller is clear and legitimate. The limited and targeted use of the information and the voluntary participation in the Event also contribute to tipping the balance in favor of the legitimate interest of the Data Controller. The interest of the Data Controller, therefore, can be considered prevalent with respect to the interests or fundamental rights and freedoms of the interested party which require the protection of personal data (Article 6, paragraph 1, letter f, GDPR).

3. Retention period

The data processed for the purpose of defending one's rights will be kept by Zona Eventi for the duration of the judicial and/or extrajudicial proceedings and/or enforcement actions, until the time limit for appeals has been exhausted, except for any further legal requirements.

RECIPIENTS OR CATEGORIES OF RECIPIENTS FOR THE PROCESSING ACTIVITIES DESCRIBED UNDER A. - B. - C.

The transmission of data to third parties is carried out for purposes that coincide with those for which the data were collected.

Personal data relating to the processing in question, for the purposes described above, may, therefore, be communicated or made known:

1. to those persons within each Controller's organisation who need it because of their duties or hierarchical position. Such persons are the those authorised to process the data under the direct authority of each Data Controller (hereinafter "Authorised Persons"). The number of Authorised Persons will be limited to a maximum, in relation to their job description, and they will only have access to the data relevant to that job description, i.e., all Authorised Persons will not have free access to all its data. The Authorised Persons shall also be properly instructed to avoid loss, destruction, unauthorised access or unauthorised processing of the data;
2. to third parties to which each Data Controller outsources certain activities and that consequently provide certain instrumental services, however related, to the processing and purposes described above, such as, for example, companies that provide services dealing with the management of websites and/or social pages, the information system, the photo/video shooting service. These subjects, who have received special instructions in this regard, may have access to the personal data of the data subjects in their entirety or in part, depending on their particular roles and purposes aimed at facilitating and improving our services. They therefore carry out processing on behalf of each Data Controller and are authorised to process the data as Data Processors in accordance with Article 28 of the GDPR;
3. to security, inspection, judicial, police authorities and, in general, to all those subjects to whom the right to access the data is recognised by specific provisions of law or by a provision issued by an authority empowered to do so by law. In other words, to all those subjects to whom the transfer of data is necessary for the fulfilment of obligations provided for by laws or regulations. These subjects will process the data as autonomous data controllers;
4. the companies belonging to the REWE Group of which Penny is part (such companies may also be located abroad, however, within the European Union) that are authorized to process the data for internal administrative purposes.

DATA TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

Data are stored on servers located within the European Union.

Without prejudice to the foregoing, such transfer, where applicable, will only take place in compliance with the conditions provided for by the GDPR and will be governed, depending on the recipients, by recourse to standard contractual clauses adopted by the European Commission or, alternatively, on the basis of an adequacy decision of the Commission and/or any other instrument permitted by the reference legislation.

YOUR RIGHTS

The GDPR grants the Participant the following rights in relation to his/her personal data, which he/she may exercise within the limits and in accordance with the provisions of the legislation. It should be noted that for processing activities carried out in their capacity as Joint Data Controllers (paragraph A), the parties, in accordance with the provisions of the aforementioned contract of joint ownership, have established that **Penny Market S.r.l. is the Joint Data Controller to whom the Participant should contact in order to exercise his/her rights and, therefore, he/she should contact the aforementioned company in the manner described below:**

Pursuant to Article 15 of the GDPR, you may request information about your personal data processed by us. In particular, you may obtain information regarding the purposes of the processing, the categories of personal data, the categories of recipients to whom your data have been or will be disclosed, the expected storage period, the existence of the right of access, rectification, erasure, restriction or objection, the right to lodge a complaint with a supervisory authority, if the data are not collected from the data subject all available information on their origin, transfers to third parties or international organisations and the existence of automatic decision-making processes, including profiling and, where applicable, meaningful information on the logic used.

In this regard, you may contact Penny at www.penny.it in the appropriate section accessible at <https://eserciziodirittiprivacy.penny.it>.

Pursuant to Article 16 of the GDPR, you may request the immediate correction of inaccurate data, or the supplementation of your personal data stored with us by means of www.penny.it in the appropriate section reachable at <https://eserciziodirittiprivacy.penny.it>.

Pursuant to Article 17 of the GDPR, you may request the deletion of your personal data held by us, provided that the processing is not necessary for the exercise of your right to freedom of expression and information, for the fulfilment of a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims.

You can request the deletion of your data at www.penny.it in the appropriate section at <https://eserciziodirittiprivacy.penny.it>.

Pursuant to Article 18 of the GDPR, you may request a restriction of the processing of your personal data if you dispute the accuracy of the data, if the processing is unlawful, if, although the data controller no longer needs the data for the purposes of processing, the personal data are necessary for the establishment, exercise or defence of a legal claim. Furthermore, pursuant to Article 18 of the GDPR, the data subject has the right to obtain the restriction of processing if he or she has objected to the processing pursuant to Article 21(1) of the GDPR.

You may request the restriction of processing by e-mail (eserciziodirittiprivacy@penny.it) or, alternatively, by post (Penny Market S.r.l., Strada Padana Superiore 11 n. 2/B, 20063, Cernusco sul Naviglio - MI -).

Pursuant to Article 20 of the GDPR, you may request that the personal data you have provided be received by you in a structured, commonly used and machine-readable format, or you may request that they be transferred to another data controller. You may exercise this right via the website www.penny.it in the appropriate section at <https://eserciziodirittiprivacy.penny.it>.

Pursuant to Article 7(3) of the GDPR, he may revoke the consent given at any time, without affecting the lawfulness of the processing based on the consent given before revocation. This right may be exercised by e-mail (eserciziodirittiprivacy@penny.it) or by post (Penny Market S.r.l., Strada Padana Superiore 11 n. 2/B, 20063, Cernusco sul Naviglio - MI -).

Right to object

Pursuant to Article 21 of the GDPR, you have the right to object at any time to the processing of personal data concerning you pursuant to Article 6(1)(f) of the GDPR.

Pursuant to Article 22 of the GDPR, you have the right to object to a decision based solely on automated processing.

You may exercise this right by e-mail (eserciziodirittiprivacy@penny.it) or, alternatively, by post (Penny Market S.r.l., Strada Padana Superiore 11 n. 2/B, 20063, Cernusco sul Naviglio - MI -).

Furthermore:

Pursuant to Article 77 of the GDPR, you have the right to lodge a complaint with a supervisory authority. He/she may contact the supervisory authority of the place where he/she usually resides, works, or where the alleged breach occurred.

All information concerning the Data Protection Supervisor (GPDP) is available at <https://www.garanteprivacy.it>.

You have the right to contact the Data Protection Officer (DPO) for all matters relating to the processing of your personal data. The DPO can be contacted as indicated in the section on the Data Protection Officer.

COOKIES IN WWW.PENNYVOLLEYCUP.IT

1. LIST OF COOKIES

A cookie is a small piece of data (text file) that a website, when visited by a user, asks the browser to store on the user's device to remember their information, such as their preferred language or login details. These cookies are set by us and referred to as first-party cookies. In particular, we use:

Strictly necessary cookies

Only technical cookies are used to the extent strictly necessary for the correct and efficient use of the site.

2. Legal basis and purpose of processing

The legal basis for the processing of strictly necessary cookies is **Art. 6(1)(f) GDPR**. The purpose of using strictly necessary cookies is to operate the site. Furthermore, certain functions cannot be offered without the use of cookies. For this, it is necessary for the browser to be recognised even after a page change. User data collected through technically necessary cookies are not used to create user profiles.

3. How to deactivate cookies via the browser configuration

Most browsers are already set to accept cookies by default. You can change your browser settings so that it only accepts certain cookies or no cookies at all. We would like to point out, however, that you may no longer be able to use all the functions of the site if cookies are disabled in your browser settings.

The user can also use the browser settings to delete cookies already stored in the browser. It is also possible to set the browser to inform the user before cookies are stored. As different browsers may differ in their functions, we ask you to use the respective browser's help menu for setting options.
