

## PRIVACY POLICY

### 1. DATA CONTROLLER

Your personal data will be processed by FC BARCELONA, with registered address at Calle Arístides Maillol, S/N, 08028 Barcelona (Spain) and with Tax ID No. G-08266298.

### 2. PURPOSES

Your data will be processed for the following purposes:

| PROCESSING                       | PURPOSE   | LEGITIMATE BASIS AND DURATION   |
|----------------------------------|---|---|
| <b>PURCHASE</b>                  | <p>Your data will be processed to manage the purchase of the requested products.</p> <p>We will also process your data, where applicable, to:</p> <ul style="list-style-type: none"><li>a) Send tickets</li><li>b) Contact you (if necessary), by telephone and/or by electronic means such as SMS or email to deal with any incident or management related to your purchase.</li><li>c) To monitor potential fraudulent transactions, which may involve the disclosure of data to providers with expertise in fraud prevention and management, in accordance with section 3 of this Privacy Policy.</li></ul> <p>It is also possible for you to purchase tickets for third parties (event attendees), in which case we will process the third party's details in order to send the tickets and/or contact them if necessary.</p> <p>In any case, by providing us with the details of these third parties, the buyer guarantees that they have informed us and that they are authorised to do so.</p> | <p>Contractual Relationship and Legitimate Interest (for fraud monitoring)</p> <p>Your data will be kept for 5 years after the tickets are purchased.</p> |
| <b>INFORMATION AND CONTACT</b>   | <p>Your data will be processed to manage your request for information and contact via the form provided.</p> <p>In addition, if necessary, we will contact you directly to manage your request.</p>   | <p>Consent</p> <p>The data will be processed as long as you do not withdraw your consent</p>  |
| <b>COMMERCIAL COMMUNICATIONS</b> | <p>In addition, you may grant us consent through the boxes enabled for this purpose, to receive:</p> <ul style="list-style-type: none"><li>- The information Newsletter of the Culers programme, which will always be personalised and adapted to your interests.</li><li>- Additional information related to FC BARCELONA, such as, for example, opinion surveys, invitations to events or products from the Club itself such as discounts or promotions for tickets to matches, merchandising, digital products, etc.</li></ul>   | <p>Consent</p> <p>The data will be processed as long as you maintain your user account or you choose to withdraw your consent [sic].</p>                  |

|   |  |   |
|---|--|---|
|   | <p>- Information, discounts or promotions from third parties with which FC BARCELONA may maintain a business or collaborative relationship, such as the FC BARCELONA Foundation or the sponsors of the Club, who may carry out actions specifically aimed at the Culers.</p> <p>All our communications will always be personalised and tailored to your interests, as described below.</p> <p>Likewise, all communications will be sent by electronic means, such as SMS/MMS, instant messaging applications or email.</p>   |   |
| <p><b>PROFILE OF OUR USERS</b></p>                                | <p>We create profiles for users who interact with us both electronically and physically. These profiles help us to offer better services, tailored to the preferences of our customers, providing quality and personalised content. For more information about this processing, please refer to section 4 of this privacy policy.</p> <p>We hereby also inform you that we carry out the processing on the basis of legitimate interest. It is in FC BARCELONA's interest to get to know its users in a way that allows us to better target the advertising messages they receive about our products and services. The benefit that this generates for the Club is that it saves on advertising costs. The benefit for the users is that they do not receive indiscriminate advertising about products and services that are not of interest to them.</p> <p>For more information about legitimate interest, please refer to section 6 of this privacy policy.</p> | <p>Legitimate interest</p> <p>The data will be processed as long as you have accepted commercial communications or until such time that you object to the processing.</p> |
| <p><b>ADVERTISING ON SOCIAL MEDIA OR THIRD PARTY SERVICES</b></p> | <p>There are certain social networks, applications or third party websites that allow the sending of commercial communications or advertising targeted to specific or targeted users.</p> <p>With this information, the social network or application verifies whether the user has an account on its platform, allowing FC BARCELONA to carry out what is known as "<i>Custom audience</i>" with those users who have registered as Culers and who have therefore agreed to receive commercial communications from FC BARCELONA in accordance with what is indicated above in this policy, and who in turn have an account on this social network or application, thus being able to show advertising directly on them.</p> <p>This type of activity can be carried out in various media, including social networks such as Facebook (<i>Custom audience</i>), Twitter (<i>Tailored audiences</i>) or Google (<i>Customer Match</i>).</p>                         | <p>Legitimate interest</p> <p>The data will be processed as long as you have accepted commercial communications or until such time that you object to the processing.</p> |

Furthermore, these social networks or applications allow the sharing of user data to find or identify what are known as “similar audiences”, i.e. users who have a profile similar to that of FC BARCELONA users on the aforementioned social network or application, but who are not FC BARCELONA users.

These types of activity are usually carried out especially through social networks such as Facebook (*Lookalike audience*), Twitter (*Tailored audiences*) or Google (*Similar Audiences*). In this case, as the advertising does not directly affect the actual own users, the basic data of all users are used, even those who have not agreed to receive commercial communications.

In relation to the data provided to these third parties, we consider it important that our users know that only their email address or telephone number will be communicated, and that it will be communicated in encrypted form guaranteeing the confidentiality and security of their data. The whole process is secured through the tool provided by the platform itself, and which will allow the platform to identify you in its database.

Remember that if you do not wish to receive advertising through social networks or third party platforms, you must restrict it through your user profile in each one, all in accordance with the privacy policies of each of the platforms.

These social networks and/or applications will provide us only with your data in an anonymous and statistical way, without us being able to re-identify you or learn about other new interests, unless you interact with us through one of our advertisements on the social network and/or application.

We hereby also inform you that we carry out the processing on the basis of legitimate interest. It is in the interest of FC BARCELONA to direct advertising messages towards segments of users who may be interested in our products and services. The benefit that this generates for the Club is that it saves on advertising costs. The benefit for the users is that they do not receive indiscriminate advertising about products and services that are not of interest to them.

For more information about legitimate interest, please refer to section 6 of this privacy policy.

If you would like to know how we have identified and carried out your legal assessment, please see section 6 of this privacy policy.

### **3. COMMUNICATION OF DATA**

Your data will not be transferred, sold, rented or otherwise made available to any third party, unless the user grants their consent, the assignment is necessary for the execution of certain services or FC BARCELONA has a legitimate interest to carry out such assignment after studying its legality. Likewise, certain FC BARCELONA service providers may access your data for the performance of certain ancillary activities for us, but in no case will they process the data for their own purposes and, always after signing the corresponding contract that guarantees the security and confidentiality of your data. Some of these suppliers may be located outside the European Union, as indicated in section 5 below.

### **4. AUTOMATED DECISIONS AND PROFILE CREATION**

As described below, FC BARCELONA will be able to profile you as a user, taking into account all the data provided by you.

This profile will take into account, for example:

- Your behaviour on the website, based on selected products, cursor movements, interests, preferences, products purchased.
- Behaviour when receiving our informative newsletters, e.g., which content is of interest to you based on newsletter opening and frequency of opening.
- Interaction you may have through other channels such as queries on our information channels or contact.
- Information you can provide us through satisfaction surveys.

Please note that for some services, we may process your personal data using automated means. This means that certain decisions are made automatically without human intervention, for example, segmenting you according to whether you are interested in certain sections of the website or are likely to use other services we may offer.

In the event that you have agreed to receive commercial communications, these may be adapted and personalised according to the interests of the users, either based on the products and services requested or on data that we can deduce or obtain from your browsing, interest in certain content and reaction to our communications, among others.

This personalisation is partially automated, in the sense that we determine the parameters of the personalisation, but it is the technological platform that generates the user profile. We do not send general communications that are not segmented using the above procedure, as we consider that it is in both our and the user's interest to send or receive relevant information, and because not segmenting would not alter the number of communications received, but only their content. In this regard, if you do not wish to be segmented, please do not subscribe to commercial communications.

In addition, the data that FC BARCELONA processes as a result of the interactions made by the user through our website when accessing through their third party username and password (Social Login): the user's name, email, date of birth and geographical location, as well as their tastes on social networks when the user consents and optionally, in order to offer a personalised experience related to the person's "likes".

### **5. INTERNATIONAL TRANSFERS**

FC BARCELONA, as an entity with international scope, has international suppliers that may provide their services from outside the EU, so it is possible that your data may be processed outside the European Union or the European Economic Area (e.g. data storage provider, etc.).

In any case, we will ensure that said data processing is always protected with the appropriate guarantees, which may include:

- EU-approved Standard Clauses
- Third party certifications

You can request more information about the guarantees taken in each case at any time by contacting our Data Protection Officer at [dpo@fcbarcelona.cat](mailto:dpo@fcbarcelona.cat)

## **6. PROCESSING BASED ON LEGITIMATE INTEREST**

In accordance with what is indicated in the second section of this Privacy Policy, FC BARCELONA may carry out processing based on legitimate interest. To assess legitimate interest, we weighed our own benefits as the data controller against the benefits of third parties. The conclusion is that our legitimate interest prevails over the rights and freedoms of users.

You may at any time request further information about the weighting of legitimate interests by contacting our Data Protection Officer at the address indicated in section 8 of this Privacy Policy. We also take this opportunity to remind you that you have the right to object to processing based on legitimate interest.

## **7. DURATION OF PROCESSING**

All the data provided will be processed during the period established in the second section of this Privacy Policy.

Without prejudice to these deadlines, your data may be kept in an anonymised form for statistical or market research purposes, where possible, or duly blocked in order to comply with any legal obligation of FC BARCELONA.

## **8. MORE INFORMATION AND EXERCISING YOUR RIGHTS**

You may request more information about the processing of your personal data at any time, as well as exercising your rights of access, rectification, deletion, limitation or portability, before the Controller of your data by contacting us at the address Calle Aristides Maillol, S/N, 08028 Barcelona (Spain), or else by email to [proteccio.dades@fcbarcelona.cat](mailto:proteccio.dades@fcbarcelona.cat)

You may also revoke the consent given or object to the processing of your data, provided that this is possible in accordance with the regulations in force. Without prejudice to the foregoing, the revocation of consent or objection to any processing may mean that we cannot provide certain services.

If you have any queries, questions or complaints about the way in which we process your personal data, you can contact our Data Protection Officer by email at [dpo@fcbarcelona.cat](mailto:dpo@fcbarcelona.cat) or by post by writing to Calle Aristides Maillol, S/N, 08028 Barcelona (Spain), with the reference "DPO". In the event that a response is not obtained within a reasonable period, a claim may be filed with the Spanish Data Protection Authority.