



## **BENFICA TV PRIVACY POLICY**

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### **1. SCOPE**

Benfica TV, S.A., NIPC 508517494, headquartered at Estádio Sport Lisboa e Benfica, Avenida Eusébio da Silva Ferreira, 1500-313 Lisbon ("Benfica TV"), carries out all types of television and television operator activities, specifically aimed at Sport Lisboa e Benfica fans and for Club matters, its sports activities and its business universe, including the organization of the respective administrative and technical services and the production, recording, broadcasting, and transmission of programs, images, and television content, by any means allowed.

Within the scope of its activity, Benfica TV processes the personal data of various data subjects under its freedom of speech and information, concerning, namely, people interviewed by Benfica TV journalists before and after sports events, commentators invited by Benfica TV to participate in television programs dedicated to commenting/discussing sports events, as well as

participants in contests/competitions or any other type of dynamics promoted by Benfica TV in the respective television programs.

To know the Benfica Group's Privacy Policy, where you can find a detailed list of the entities that compose the Benfica Group, [click here](#).

This Privacy Policy is intended to help people from whom we process data (hereinafter "Data Subjects") understand what personal data we collect, how and why we use it, to whom we disclose it, and how we protect their privacy.

Accordingly, Benfica TV adopts the conduct and implements the necessary mechanisms to ensure strict compliance with the legislation relating to the protection of personal data that is, at all times, in force, namely Regulation (EU) No 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of such data ("GDPR") and Law 58/2019, of August 8, which ensures the execution of the GDPR in Portugal.

## **2. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?**

Benfica TV, S.A. is responsible for processing the personal data of the data subjects, which it does under the terms best described in this Privacy Policy.

References in this Privacy Policy to "Benfica TV", "we", "us" or "our" mean the following Benfica Group entity: Benfica TV, S.A., NIPC 508517494, headquartered at Estádio Sport Lisboa e Benfica, Avenida Eusébio da Silva Ferreira, 1500-313 Lisboa. This entity, with whom you have established a relationship and who in the appropriate context determines the purposes and means of processing the personal data, is for this purpose considered the data controller, under the terms of the GDPR.

## **3. WHAT IS PERSONAL DATA?**

Personal data means any information of any nature, regardless of its support, including sound and image, relating to an identified or identifiable individual ("data subject"). A person is considered identifiable if he/she can be identified directly or indirectly, namely by reference to an identification number or more specific elements of his/her physical, physiological, psychic, economic, cultural, or social identity.

#### 4. WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSES?

Benfica TV collects and processes the personal data necessary for the processing purposes previously defined.

- **Categories of personal data we process, purposes, and grounds**

WHEN YOU PARTICIPATE AS A COMMENTATOR IN BENFICA TV PROGRAMS (INVITATION-BASED)			
CATEGORIES OF PERSONAL DATA PROCESSED	TYPES OF DATA	PROCESSING PURPOSES	BASIS OF LAWFULNESS
Identification Data	First name, middle name, last name, date of birth	Management of participation in Benfica TV program	Execution of participation in Benfica TV program / Pursuit of Benfica TV's legitimate interests
Voice and Image	Image, voice		
Directory Data	phone number (mobile), e-mail		

WHEN YOU ARE INTERVIEWED BY OUR JOURNALISTS (BEFORE AND AFTER SPORTING EVENTS)			
CATEGORIES OF PERSONAL DATA PROCESSED	TYPES OF DATA	PROCESSING PURPOSES	BASIS OF LAWFULNESS
Voice and Image	Image, voice	Exercise of the journalistic function and freedom of information	Pursuit of Benfica TV's legitimate interests

WHEN YOU PARTICIPATE IN COMPETITIONS/CONTESTS OR ANY OTHER TYPE OF DYNAMICS OF BENFICA TV (IN THE CONTEXT OF A BENFICATV TELEVISION PROGRAM)			
CATEGORIES OF PERSONAL DATA PROCESSED	TYPES OF DATA	PROCESSING PURPOSES	BASIS OF LAWFULNESS
Identification Data	First name, middle name, last name, date of birth	Management of participation in Benfica	Execution of the participation in the competition / contest

Directory Data	Address or place of residence, telephone number, telephone number (mobile), e-mail	TV's contest/competition	
Voice and Image	Voice		

Benfica TV is especially concerned with the protection of the rights of minors, and therefore the collection of personal data of people under the age of 18 requires, in most cases, the consent of the respective holders of parental responsibilities. Benfica TV ensures that it complies with the provisions set out in Law No. 74/2020, of November 19, which transposes into national law Directive (EU) 2018/1808 of the European Parliament and of the Council, of November 14, 2018, amending Law No. 27/2007, of July 30, which approves the Television and Audiovisual Services on Demand Law, and Law No. 55/2012, of September 6, on the promotion, development, and protection of the art of cinema and cinematographic and audiovisual activities.

## **5. IN PARTICULAR, THE USE OF YOUR DATA WITHIN THE SCOPE OF BENFICA TV'S TELEVISION ACTIVITY**

The use of your image and/or voice and/or biographical elements under the terms identified above may include the broadcasting and rebroadcasting of the same in the context of your participation in Benfica TV's television journalistic programs in associated contests, by any means, form, and support, without temporal or territorial restrictions, including in live broadcasts and in eventually deferred broadcasts, online availability, and archive.

Benfica TV may, in the broadest terms permitted by law and always within the scope of its freedom of expression and information, broadcast and rebroadcast your image and/or your voice and/or your biographical elements, anywhere in the world and without restrictions, having the right to re-record, edit, broadcast, use, fix, and transform your image and/or your voice in all media and in all formats currently known or that may be invented (including, but not limited to television channels, websites, social networks, streaming programs, etc. ), anywhere in the world and without restriction.

## **6. HOW LONG DO WE STORE PERSONAL DATA?**

The personal data collected are processed in strict compliance with the applicable legislation and stored in a specific database created for this purpose.

The period for which data are stored and retained varies according to the purpose for which the information is used. There are, however, legal requirements that require data to be retained for a certain period, namely under the Law of Television and Audiovisual Services on Demand, approved by Law no. 27/2007, of July 30, as amended in the meantime ("Television Law"). Thus, and whenever there is no specific legal requirement, the data will be stored and maintained only for the period necessary for the purposes for which they were collected, as identified above.

## 7. WHAT ARE THE RIGHTS OF THE DATA SUBJECTS?

Under the applicable legislation, the data subject may exercise, at any time, the following rights:

**Right of access:** Benfica TV ensures that means allowing data subjects to access the personal data that belongs to them.

Additionally, Benfica TV ensures the existence of procedures, under the terms of the Television Law, to allow the data subject to exercise the **right to view** the material in question (this right shall be exercised by the data subject himself, by his legal representative or by his heirs)

**Right to rectification:** Benfica TV ensures the existence of means that allow data subjects to rectify their personal data if it is incorrect/inaccurate, or to complete it if it is incomplete.

Additionally, Benfica TV ensures the existence of procedures, under the terms of the Television Law, which allow data subjects to exercise the **right to rectification**, whenever in the scope of the television program services, untrue or erroneous references have been made to the data subject. This right shall be exercised by the data subject, by his/her legal representative or by his/her heirs. The right to rectification must also be exercised within 20 (twenty) days following the broadcast of the program. However, this right may not be exercised if the statements are made by the person concerned and with direct speech.

**Right to erasure "Right to be forgotten":** Benfica TV ensures the existence of means that allow data subjects to request the erasure of their personal data when any of the following circumstances occur:

- When the data are no longer necessary in relation to the purposes for which it was collected or otherwise processed
- When the data subject withdraws consent on which the processing of data is based and there is no other legal ground for the processing
- When the data subject exercises the right to object to the processing and there are no overriding legitimate grounds for the processing
- When personal data has been unlawfully processed
- When the data must be erased for compliance with a legal obligation for which the controller is subject or
- when the data has been obtained in the context of the offer of information society to minors

Without prejudice to the above, the **right to erasure** should always be exercised within a framework of balance with Benfica TV's exercise of freedom of expression and information in the exercise of its journalistic activities.

**Right to object:** Benfica TV ensures the existence of means that allow data subjects to object to specific personal data processing for specific purposes listed below, without prejudice to directives or laws in force:

- Freedom of expression and information, for the pursuit of a legitimate interest of Benfica TV or a third party
- Guarantee that the purpose of the processing is compatible with the purpose for which the data was initially collected

**Right to restriction of processing:** Benfica TV ensures the existence of means that allow data subjects to request the restriction of the processing of their personal data

**Right to data portability:** Benfica TV ensures the existence of means that allow data subjects to request that a copy of their personal data be sent to another controller. This data is transmitted in a digital and structured format.

**Right to reply:** Benfica TV ensures the existence of procedures, in accordance with the Television Law, that allow the data subject to enjoy the **right to reply** whenever, in the scope of television program services, references have been made to him/her, even indirectly, that may affect his/her reputation or good name. This right shall be exercised by the data subject, by his/her legal representative or by his/her heirs. The right of reply must be exercised within 20 (twenty) days following the broadcast of the program. However, this right may not apply if the statements are made by the person concerned and with direct speech.

## **8. EXERCISE OF RIGHTS**

Data subjects may exercise their rights by written request addressed to Benfica TV to the e-mail address [dpo@slbenfica.pt](mailto:dpo@slbenfica.pt) or to the address Estádio Sport Lisboa e Benfica, Av. Eusébio da Silva Ferreira, 1500-313 Lisboa.

In accordance with the applicable legislation, you are also guaranteed the right to withdraw your consent for the processing of the data for which consent is the basis of lawfulness of the processing, through the above-mentioned contact details. To this end, you have the right to withdraw your consent at any time, which shall not, however, invalidate the processing carried out until that date based on the consent previously given.

Without prejudice to any other administrative or judicial appeal, the data subject has the right to submit a complaint with the national supervisory authority (CNPD) or any other competent supervisory authority under the law, if the data subject considers that the data are not being processed lawfully by Benfica TV, under applicable the applicable legislation and this Privacy Policy.

## **9. WHAT SECURITY MEASURES ARE ADOPTED?**

Benfica TV implements a set of procedural and technological measures to ensure the safety of the processing of personal data carried out by Benfica TV or by companies hired by it.

## **10. UNDER WHAT CIRCUMSTANCES IS DATA COMMUNICATED TO OTHER ENTITIES?**

Benfica TV uses other entities for the rendering of certain services. This provision of services may eventually imply access, by these entities, to the personal data of the data subjects (acting as processors).

Any processor of Benfica TV will process the personal data of the data subjects in name and on behalf of Benfica TV under the strict obligation to follow our instructions. Benfica TV shall ensure that such processors provide enough guarantees that appropriate technical and organizational measures are taken so that the processing complies with the requirements of the applicable legislation and ensures the safety and protection of the rights of the data subjects, under the data processing agreement concluded with processors.

Benfica TV may also transfer personal data to third parties (such as tax authorities, courts, police) as part of its freedom of expression and information, and/or when it deems such data communications necessary or appropriate (i) considering the applicable legislation, (ii) in compliance with legal/regulatory obligations/judicial orders, or (iii) to answer requests from public or governmental authorities, as well as (iv) in the scope of partnerships it has established.

In any of the situations mentioned above, Benfica TV undertakes to take all reasonable measures to ensure the actual protection of the personal data it handles.

Benfica TV undertakes to ensure the security and integrity of data in the cross-border transfer (outside the European Economic Area) and to inform data subjects of this transfer whenever it occurs. Additionally, Benfica TV is responsible for implementing the necessary mechanisms to obtain the lawful basis to execute any cross-border transfer, whenever applicable (for example, the celebration of the Standard Contractual Clauses approved by the European Commission).

## **11. QUESTIONS AND REQUESTS FOR INFORMATION**

You may contact the Data Protection Officer ("DPO") of the Benfica Group for further information about the processing of your personal data, as well as any questions related to the exercise of your rights under applicable law and those referred to in this Privacy Policy, through the following contacts:

E-mail: [dpo@slbenfica.pt](mailto:dpo@slbenfica.pt)

Address: Estádio Sport Lisboa e Benfica, Av. Eusébio da Silva Ferreira, 1500-313 Lisboa

## **12. HOW CAN YOU LEARN ABOUT ANY CHANGES TO OUR PRIVACY POLICY?**

Benfica TV reserves the right, at any time, to make modifications or updates to this Privacy Policy, and these changes will be duly updated at <https://www.slbenfica.pt/politica-de-privacidade-benfica-tv>. We suggest that you check this Privacy Policy regularly to be aware of any changes.

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