



CASAS DO SPORT LISBOA E BENFICA PRIVACY POLICY

1. WHY?

Within the scope of its activity, Casas do Sport Lisboa e Benfica process personal data of various data subjects, namely members, supporters, and their families. The Casa do Benfica of which you are a member or with which you have established a relationship with will be the controller processing your personal data (hereinafter "Casa do Benfica").

This Privacy Policy aims to help people whose data are processed (hereinafter "Data Subjects") understand what personal data we collect, how and why it processed, to whom the data may be disclosed, and how we protect their privacy.

In this regard, Casas do Benfica adopt 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 April 27, 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 No. 58/2019, of August 8, which ensures the execution of the GDPR in Portugal.

By filling out our forms and providing data directly or indirectly to us, as well as navigating our websites, your knowledge and accept of the conditions of this Privacy Policy and any other specific terms, policies, and conditions.

2. WHAT IS PERSONAL DATA?

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

3. WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSES?

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

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

CATEGORIES OF PERSONAL DATA	TYPES OF DATA
Identification Data	Full name, date of birth, gender, ID Card number, nationality, photograph, marital status, occupation, additional data
Directory Data	Address (main), telephone number (landline), telephone number (mobile), e-mail, additional data
Bank Details	International Bank Account Number (IBAN)
Other Government Issued Identifiers	social media identifiers, NIF, NISS, health user number, complementary data

Casa do Benfica processes this data in accordance with the applicable legislation, for various purposes, including:

PROCESSING PURPOSES	BASIS OF LAWFULNESS
Management of the relationship with Casa do Benfica members (a) Registration of members in Casa do Benfica (b) Sending information requested by Casa do Benfica member (c) Managing contacts, information, or complaints (d) Invoicing (such as payment of membership fees) (e) Customer Support	<ul style="list-style-type: none">○ Execution of Contract and pre-contractual proceedings○ Compliance with legal obligations○ Consent
Sale of Sport Lisboa e Benfica products (a) Sale of products and articles related with Sport Lisboa e Benfica (merchandising) (b) Sale of tickets to attend competitions in which Sport Lisboa e Benfica's professional teams participate (c) Intermediation of membership adhesions to Sport Lisboa e Benfica	<ul style="list-style-type: none">○ Execution of Contract and pre-contractual proceedings○ Compliance with legal obligations
Compliance with legal obligations	<ul style="list-style-type: none">○ Compliance with legal obligations

Response and reporting to judicial orders, administrative requisitions, or information requests submitted by public authorities with their own or delegated powers	
Direct Marketing (a) Information or marketing actions, in particular for the sending of communications for direct marketing purposes, namely through the use of automated calling and communication systems that do not depend on human intervention (automatic calling machines), fax machines, or electronic mail (e-mail), including SMS (short message services), EMS (enhanced messaging services), MMS (multimedia messaging services), application notifications and other similar types of applications) (b) Disclosure of campaigns, promotions, publicity, and news about the Casa do Sport Lisboa e Benfica's products and/or services (c) Disclosure of campaigns, promotions, advertising, and news regarding Sport Lisboa e Benfica's products and/or services (d) Member consumption metrics, namely with a view to developing customization mechanisms	<ul style="list-style-type: none"> ○ Consent ○ Legitimate interest of the controller
Exercise of Casa do Benfica's rights Collection of debts: either in the judicial plan (in common or arbitral courts), or in the extrajudicial plan (cases in which personal data may be ceded to Casa do Benfica representatives and advisors, such as lawyers, solicitors, and/or accountants)	<ul style="list-style-type: none"> ○ Execution of Contract ○ Compliance with legal obligations
Events (a) Organization and promotion of sports training programs (b) Organization and promotion of non-sports programs	<ul style="list-style-type: none"> ○ Consent

Casa do Benfica is especially concerned with the protection of the rights of minors, so the collection of personal data of minors under 18 years of age is dependent on the consent of the respective holders of parental responsibilities, provided under the terms and by the means defined by Casa do Benfica.

4. HOW LONG WILL YOUR PERSONAL DATA BE STORED?

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. 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 the data were collected, as identified above.

5. WHAT ARE THE RIGHTS OF THE DATA SUBJECTS?

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

Right of access: Casa do Benfica ensures the existence of means allowing data subjects to have access to the personal data that belongs to them

Right to rectification: Casa do Benfica ensures the existence of means that allow data subjects to rectify their personal data, if it is incorrect/inexact, or complete it if it is incomplete

Right to erasure “Right to be forgotten”: Casa do Benfica ensures the existence of means that allow data subjects to request the erasure of their personal data when any of the following circumstances occur:

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| <ul style="list-style-type: none">• 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 |
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Right to object: Casa do Benfica 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:

- Performance of public interest tasks for the pursuit of a legitimate interest of the said controller or a third party
- Guarantee that the purpose of the processing is compatible with the purpose for which the data was initially collected, including the definition of profiles
- Sending marketing communications or processing of data for targeted advertising, based on the legitimate interests of Casa do Benfica

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

Right to data portability: Casa do Benfica 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

Data subjects may exercise their rights by written request addressed to Casa do Benfica to the address or the official email address of Casa do Benfica.

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 legitimacy of processing, by the above-mentioned means. 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 means of administrative or judicial appeal, the data subject has the right to submit a complaint to 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 Casa do Benfica, under the applicable legislation and this Privacy Policy.

6. WHAT SECURITY MEASURES ARE ADOPTED?

Casa do Benfica implements a set of procedural and technological measures to ensure the safety of the processing of personal data carried out by Casa do Benfica or by companies hired by it. Procedures and security controls are defined at both physical and digital levels, to ensure data integrity and access control, and that only authorized users have access to the data.

Casa do Benfica adopts measures to safeguard the security of personal data, including protection against illegitimate access, appropriation, tampering and/or unauthorized disclosure,

unlawful destruction, and dissemination of malicious software (computer viruses), adopting the appropriate technical and organizational measures for this purpose.

Any communication or message sent by the User by e-mail, the transmission of files, the inclusion of data, or any other form of unsolicited communication and, provided it does not contain instructions to the contrary, shall be considered non-confidential and free of any restrictions of use.

7. UNDER WHAT CIRCUMSTANCES IS DATA COMMUNICATED TO OTHER ENTITIES?

For the purposes of integrated management of members and control of the Sport Lisboa e Benfica brand, we inform you that your personal data will be communicated to other entities of the Sport Lisboa e Benfica Group¹.

Casa do Benfica uses other entities for the rendering of certain services. This provision of services may involve access, by these entities, to personal data of the data subjects, these entities acting as processors. Any processor of Casa do Benfica will process the personal data of the data subjects in name and on behalf of Casa do Benfica, under the strict obligation to follow our instructions. Casa do Benfica 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 the processors. Casa do Benfica may also transfer personal data to third parties when it deems such 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, Casa do Benfica undertakes to take all reasonable measures to ensure the actual protection of the personal data it handles.

¹ Within the context of this Privacy Policy, the Benfica Group is composed of the following companies: Sport Lisboa e Benfica Clube, NIPC 500276722; Sport Lisboa e Benfica – Futebol, SAD, NIPC 504882066; Sport Lisboa e Benfica – Multimédia, S.A., NIPC 505564424; Benfica FM, S.A. NIPC 514631228; Benfica Estádio – Construção e Gestão de Estádios, S.A., NIPC 505813378; Parque do Benfica – Sociedade Imobiliária, S.A., NIPC 506807410; Clínica do Benfica, Lda. NIPC 508205360; Benfica TV, S.A., NIPC 508517494; Sport Lisboa e Benfica – Seguros, Mediação de Seguros, Lda. NIPC 508797404; Identiperímetro Sociedade Imobiliária, S.A. NIPC 508992770; Red Up Sports, Lda. NIPC 514395931; Fundação Benfica NIPC 509259740. All headquartered at Estádio Sport Lisboa e Benfica, Avenida Eusébio da Silva Ferreira, 1500-313, Lisboa.

Casa do Benfica 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, Casa do Benfica 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).

8. CONTACT US

You may contact Casa do Benfica for further information about the processing of your personal data, as well as any questions related to the exercise of your rights under the applicable legislation and those referred to in this Privacy Policy, through the official contacts of Casa do Benfica.

You can also contact the Department of Casas do Benfica of Sport Lisboa e Benfica through the following contacts:

Telefone: 217219543

e-mail: casas.benfica@slbenfica.pt

Address: Estádio do Sport Lisboa e Benfica, Departamento das Casas do Benfica, Av. Eusébio da Silva Ferreira – Porta 18, 1500-313 Lisboa

9. HOW CAN YOU FIND OUT ABOUT ANY AMENDMENTS TO OUR PRIVACY POLICY?

Casa do Benfica reserves the right, at any time, to make changes or updates to this Privacy Policy. We suggest that you check this Privacy Policy regularly to be aware of any changes.

Last update date: 18/01/2021