



## SPORT LISBOA E BENFICA

### PRIVACY POLICY

#### 1. OBJECT

- 1.1. Sport Lisboa e Benfica, as the entity responsible for the processing of personal data that it collects through the computer platforms it makes available — namely, the website “www.slbenfica.pt” (Benfica’s official site) and any other applications available for use on computers, tablets, mobile phones, or other devices (hereinafter, “Platforms”) — adopts the conduct and implements the necessary mechanisms to ensure the strict compliance with the legislation on personal data that is, at all times, in force, namely Law no. 67/98, of October 26 (in the wording that it has been given by the Rectification no. 22/98, of November 28 and by Law no. 103/2015, of August 24), Law no. 41/2004 of August (in the wording that it has been given by Law 46/2012 of August 29) and the 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 on the free movement of such data.
- 1.2. For this purpose, Benfica approves and implements a Privacy Policy, which is an integral part of the Terms of Use (available [here](#)), endowing the Platforms with the necessary functionalities to exercise the rights of the user as the holder of personal data and regardless of their nationality or place of residence, as well as implementing security mechanisms that protect said personal data against illegal intrusion and improper access.
- 1.3. This Privacy Policy establishes the rules governing the treatment of the personal data of the user of the Platforms, since its collection — namely through the Contact Center (707 200 100); in the stores selling Benfica items (merchandising), including the store located at Estádio da Luz, Casas do Benfica and the online store; in the Benfica Museum - Cosme Damião; on the Benfica official site and the computer applications —, conservation, use, transmission, until its elimination, and also the prior consents to this treatment and the purposes hereof.
- 1.4. In the context of the Privacy Policy, the expression “Benfica” means and includes, unless expressly stated otherwise, all legal persons that, at all times, are part of and form the Benfica Group, namely, the club Sport Lisboa e Benfica, Sport Lisboa e Benfica - Futebol, SAD, Sport Lisboa e Benfica, SGPS, S.A., Sport Lisboa e Benfica – Multimédia, S.A., Benfica Estádio – Construção e Gestão de Estádios, S.A., Parque do Benfica – Sociedade Imobiliária, S.A., Clínica do SLB, Lda., Benfica TV, S.A., Sport Lisboa e Benfica – Seguros, Mediação de Seguros, Lda., Benfica Foundation.



- 1.5. Without prejudice to the provisions of the law, Benfica reserves the right to modify, replace and/or revoke, in whole or in part, its Privacy Policy, and unless otherwise noted, the modifications take effect after their disclosure in the Platforms.
- 1.6. The user may, at any time, read the updated version of the Privacy Policy clicking [here](#).
- 1.7. The Privacy Policy may be complemented with specific terms of use from each Platform, which are equally binding.

## 2. PROCESSING OF PERSONAL DATA

- 2.1. In the scope of the Privacy Policy, the following definitions apply:
  - a) “Personal Data”, the user information (namely, full name, ID number, tax number and, when associated with any of these, gender, location data, usage data of the Platforms), that is collected by Benfica or transmitted by any commercial partner;
  - b) “Processing”, operation or set of operations carried out on Personal Data, by automated or non-automated means, such as collection, registration, organization, structuring, preservation, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of disclosure, comparison or interconnection, limitation, erasure or destruction comparison or interconnection, limitation, deletion or destruction;
  - c) “Profile Definition”, any form of automated processing of Personal Data that consist in using those data to evaluate certain personal aspects of the user, namely to analyze or predict aspects related with the personal preferences and interests;
  - d) “Control Authority”, the independent public authority established by the State responsible for monitoring the application of the legislation on the protection of personal data to defend the fundamental rights and freedoms of natural persons regarding the Processing and to facilitate the free movement of such data in the European Union.
- 2.2. Sport Lisboa e Benfica is the entity responsible for the Processing of Personal Data collected through registration and/or user activity on the Platforms or through personal, face-to-face, telephone, mail or postal contact and can be contacted by the user by postal mail (by sending a letter addressed to the “Data Protection Officer” and send it to the following address: Av. Eusébio da Silva Ferreira, Estádio do Sport Lisboa e Benfica, Porta n.º 18, 1500-313 Lisboa) or by e-mail (by sending an e-mail to the following e-mail address: [dpo@slbenfica.pt](mailto:dpo@slbenfica.pt)).



- 2.3. Benfica does not collect Personal Data automatically, but only when they are voluntarily supplied by the user, which is the case when and if the user registers on the Platforms or completes a form online or in the stores.
- 2.4. The user may visit the Benfica official site anonymously, although in doing so, such use will be limited to the resources available for that form of navigation.
- 2.5. When registering on the Platforms, the user may be asked to enter his full name, date of birth, e-mail address, gender, county and country of residence, and other relevant information.
- 2.6. By providing Personal Data to Benfica under the terms described in the Privacy Policy and providing the respective consents, you are giving Benfica your consent to use this information for the purposes referred to in the next chapter.
- 2.7. The Personal Data receive a lawful, fair and transparent processing to the user, collected for specific purposes, explicit and legitimate, and appropriate, relevant and limited to what is necessary for the purposes for which they are treated, exact and updated whenever necessary.
- 2.8. Benfica takes all appropriate measures to ensure that inaccurate data, considering the purposes for which they are processed, are erased or rectified without delay.
- 2.9. The Personal Data are store in Benfica's computer systems and stored there for different periods of time, depending on the purpose for which they are intended and taking into account legal criteria, the need for and the minimization of the storage time, and by default such storage is maintained as long as the user does not exercise his right to delete them and as long as the purposes of its Treatment remain.
- 2.10. The Processing is carried out in a manner that guarantees the security of Personal Data, including protection against illegitimate access, appropriation, unauthorized tampering and/or disclosure, improper disposal and dissemination of malicious software (computer viruses), with Benfica adopting the appropriate technical and organizational measures to that effect.
- 2.11. In case of loss, misuse, alteration and unauthorized access and misappropriation of the personal data provided or transmitted by Benfica, the data owners will be notified within the legal deadlines.
- 2.12. In compliance with the legislation on the protection of personal data and with a view to ensuring the permanent observance of such legislation, as well as to receive the complaints, complaints, and suggestions that users wish to present in this regard, Benfica assigned a Data Protection Officer (DPO) who can be contacted directly by postal mail (by sending a letter addressed to "Data Protection Officer - Sport Lisboa e Benfica" and sending it to the following address: Av. Eusébio da Silva Ferreira, Estádio do Sport Lisboa e Benfica, Porta n.º 18, 1500-313 Lisboa) or by e-mail (by sending an e-mail to the following e-mail address: [dpo@slbenfica.pt](mailto:dpo@slbenfica.pt)).



### **3. PURPOSES OF PROCESSING**

- 3.1. The Platforms have as the main purpose to provide up-to-date information on the activities related to the Club and to the Benfica SAD, as well as to provide services to its members, supporters and the general public.
- 3.2. The Personal Data can be processed for the following purposes: conclusion of contracts; online shopping processing; management of the relationship with the members and supporters of Benfica; provision of services, such as the payment of member fees and the purchase of tickets and articles related to Benfica (merchandising); adapting services to the needs and interests of members and supporters; information or marketing actions, in particular for the sending of communications for direct marketing purposes, namely through the use of automated calling systems and communication that do not depend on human intervention (automated calling machines), fax machines and e-mail, including SMS (short message service), EMS (enhanced messaging service), MMS (multimedia message service), apps notifications and other similar applications; interaction on the platforms and social networks, using or reproducing the content publicly available where you have referred to or affix a tag/hashtag to Benfica, to Benfica's brands, products or services; sending complaints and suggestions; disclosure of institutional information about Benfica; campaigns, discounts, advertising and news about products and/or services of Benfica; execution of market studies and assessment surveys; Profile Definition, namely aiming to develop personalization mechanisms.
- 3.3. The Personal Data will also be used for:
  - a) Compliance with the Terms of Use and applicable law, in which case Personal Data may be assigned to the DPO;
  - b) Compliance with court orders, administrative requests or requests for information submitted by any public authority, with its own or delegated powers, in which case the Personal Data may be assigned to such entities;
  - c) The exercise of a right of Benfica with respect to the user for the collection of credits, either in the judicial field (before the common or arbitral courts) or in the extrajudicial system, in which cases Personal Data may be transferred to representatives and advisors of Benfica, as lawyers, solicitors and/or accountants;
- 3.4. To access some Platforms and/or Contents it is mandatory to provide the data requested therein, since without them it is not possible to provide the services requested by the user.
- 3.5. The credit card information provided by the user during the process of purchasing products, services and/or content made available by Benfica are only collected for this purpose, specifically, to process the payment, to



confirm the order and to issue the respective receipt/invoice, and are not used for any other purpose.

#### **4. RECIPIENTS OF PERSONAL DATA**

- 4.1. The Personal Data collected are to be processed by Benfica, in accordance with the purposes disclosed in the previous chapter, but may be transferred to third parties that are commercial partners of Benfica in the supply of goods and services provided to members, supporters and the general public.
- 4.2. In the formalization of the partnership relationship referred to in the preceding paragraph, Benfica shall require the commercial partner to strictly comply with the legislation in force, regarding the protection of the Personal Data assigned.
- 4.3. The Personal Data may also be transferred to third parties in the event of a sale, merger, consolidation, liquidation, reorganization or acquisition of any of the corporate entities that make up the Benfica Group.

#### **5. GARANTIES AND PROTECTION MEASURES**

- 5.1. Benfica guarantees the privacy and security in the transmission and storage of Personal Data, by using SSL cryptographic (Secure Sockets Layer) of all the information provided by the user.
- 5.2. Benfica implements and keeps in place the means and technical security measures that are within its reach to prevent unauthorized access and appropriation, loss, and misuse of Personal Data.
- 5.3. In the area of privacy and personal data protection, Benfica's obligations to the user, as the holder of personal data, are obligations of means (and not of result), which is why, when accessing the Platforms and the Contents, the user acknowledges and accepts, likewise, taking the risks inherent in such activity in the digital and electronic environment, such as illegitimate access, misappropriation, unauthorized tampering and/or disclosure, improper disposal and dissemination of malicious software (computer viruses);
- 5.4. The user also acknowledges and accepts that Benfica, its administrators, directors, and employees, shall not be liable for the unlawful acts committed by third parties, including other users, particularly those referred to in the preceding paragraph, even in cases in which such acts cause damages, whether of an economic or moral order.
- 5.5. Any communication or message sent by the user by e-mail, archives and files transfer, the inclusion of data or any other form unsolicited communications and, unless instructed otherwise, shall be deemed non-confidential and free of any restrictions of use.

#### **6. USER RIGHTS**



- 6.1. The following rights are granted to the user with respect to his personal data:
  - a) Access to Personal Data, as well as its correction or its erasure, namely, through the Platforms, in the account created by the user;
  - b) Limitation of Processing in respect of everything that concerns him, including the right to object to processing;
  - c) Revoke the consent at any time, however without compromising the lawfulness of Processing performed based on prior informed consent;
  - d) Portability of Personal Data when they are treated by automated means.
  - e) Complaint, either with the DPO or with the Control Authority.
- 6.2. The elimination of registration or user/client account, as well as the revocation of consent(s) in a specific Platform, only takes effect on that Platform, not being, therefore, efficient with respect to the registration or user accounts create, nor the consents provided on another Platform.

To download the Privacy Policy as a pdf file, click [here](#).