

## PRIVACY POLICY

### 1. DATA CONTROLLER

Your personal data will be processed by FC Barcelona, with address at Arístides Maillol, s/n, 08028 Barcelona and with NIF (Número de Identificación Fiscal [Tax Identification Number]) G-08266298.

### 2. PURPOSES

Your data will be processed for the following purposes:

PROCESSING	PURPOSE	LEGITIMATE BASIS AND DURATION
<b>MEMBERSHIP APPLICATION</b>	We will process your application to review compliance with the necessary requirements in order to formalise the registration process as a member.	Execution of pre-contractual measures requested by the user.  The data will be processed throughout the duration of the relationship.
<b>COMMERCIAL COMMUNICATIONS</b>	In addition, you may grant us your consent by ticking the box enabled accordingly in order to receive commercial information from FC Barcelona.  All communications we send will always be personalised and tailored to your interests, as described below.  Likewise, all communications will be sent electronically, such as SMS/MMS, instant messaging applications, or email.	Consent  The data will be processed until you withdraw your consent.
<b>ADVERTISING ON SOCIAL NETWORKS OR THIRD-PARTY SERVICES</b>	Certain third-party social networks, applications and web pages allow commercial communications or advertising to be sent to specific or target groups of users.  With this information, the social network or application verifies if the user has an account on its platform, allowing FC Barcelona to perform what is known as "Custom audience" activities for users who have registered as Culer and, therefore, have agreed to receive commercial communications from FC Barcelona in accordance with the above provisions of this policy, and who in turn have an account with said social network or application,	Legitimate interest  The data will be processed while you agree to receive commercial communications or until you object to the processing.

	<p>making it possible to show advertising directly to them.</p> <p>This type of activity can be carried out using different media, predominantly Facebook (Custom audiences), Twitter (Tailored audiences) and Google (Customer Match).</p> <p>Furthermore, these social networks or applications allow user data to be shared in order to find or identify what is known as “similar audiences”, or those with a similar profile to FC Barcelona users on said social network or application, but who are not users of FC Barcelona.</p> <p>This type of activity is usually carried out through social networks such as Facebook (Lookalike audience), Twitter (Tailored audiences) and Google (Similar audiences). In this case, as it does not directly show advertising to users themselves, the basic data of all users, even those who have not agreed to receive commercial communications, are used.</p> <p>As for data provided to these third parties, we believe that our users should be aware that only their email address or telephone number will be disclosed and that these will be sent in encrypted form to guarantee the confidentiality and security of their data. The entire process is secured through the tool provided by the platform, which will allow it to identify you in its database.</p> <p>Remember that if you do not wish to receive advertising through social networks or third-party platforms, you must restrict this via your user profile, all in accordance with the privacy policies of each platform.</p> <p>These social networks and/or applications will only provide us with your data in the form of anonymised statistics and we will be unable to identify you again or learn about other new interests, unless you interact with us through one of our advertisements on the social network and/or application.</p> <p>We also inform you that we process data on the basis of legitimate interest. FC Barcelona seeks to orient advertising messages based on user segments that may be interested in our products and services. The benefit that this generates for the Club is the savings in advertising costs. The benefit for users is that they do not receive indiscriminate</p>	
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	<p>advertising about products and services that do not interest them.</p> <p>For further information about this legitimate interest, please refer to section 6 of this privacy policy.</p> <p>If you would like to know how we have identified and undertaken your legal assessment, please refer to section 6 of this privacy policy.</p>	
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### 3. DATA COMMUNICATION

Your data will not be transferred, sold, leased or otherwise made available to any third party, except for FC Barcelona service providers who carry out certain activities for us, but under no circumstances will they process the data for their own purposes. Some of these providers may be outside the European Union, as indicated in section 5 of the privacy policy.

### 4. PROFILING AND AUTOMATED DECISIONS

As indicated below, FC Barcelona will be able to profile your user account, taking into account all the information you provide.

This profile will consider, for example:

- Your behaviour on the website, based on products selected, cursor movements, interests, preferences, products purchased.
- Your behaviour when we send our informative newsletters, such as the content you find interesting, according to the newsletters that are opened and the frequency with which they are opened.
- Your interaction through other channels, such as enquiries via our information or contact channels.
- Information you may provide to us through satisfaction surveys.

We also advise you that we may process your personal data using automated methods for some services. This means that certain decisions are made automatically, without human intervention, such as, for example, segmenting your user profile based on the interest you show in certain sections of the website or your use of other services we may offer.

If you have agreed to receive commercial communications, they may be adapted and customised according to the users' interests, either based on the products and services requested, or based on the data we can deduce or obtain from your browsing, your interest in certain content or your reaction to our communications, among other behaviour.

Said customisation is carried out in a partially automated way, whereby we determine the customisation parameters, but the user profile is generated by the technological platform. We do not send general communications that have not been segmented through the previous procedure as we consider that it is in our interest and that of the user to send or receive relevant information, and because not segmenting would not alter the number of communications received, but rather

only the content thereof. Therefore, if you do not want your user profile to be segmented, please do not subscribe to commercial communications.

## **5. INTERNATIONAL TRANSFERS**

FC Barcelona and BLM, as organisations with international exposure, use international providers 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 (for example, the data storage provider, etc.).

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

- Standard Clauses approved by the EU
- Third-party certifications

You may request further information at any time regarding the guarantees adopted in each case, 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 stipulated in the second section of this Privacy Policy, [COMPANY] may carry out processing based on legitimate interest. To assess the legitimate interest, a weighting of the legitimate interest has been carried out in which the specific benefits as the data controller have been analysed, as well as the benefits of third parties, and in which it is concluded that our legitimate interest in the processing activity takes precedence over the interests, rights and freedoms of users.

You may request further information at any time regarding the weighting of legitimate interest 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 THE PROCESSING**

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

Notwithstanding said terms, your data may be stored anonymously for statistical or market research purposes, whenever possible, or duly blocked in order to comply with any legal obligation of FC Barcelona.

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

You may request further information at any time regarding the processing of your personal data, as well as to exercise your rights of access, rectification, erasure, restriction or portability, by writing to the Data Controller at Avda. Aristides Maillol, S/N, 08028, Barcelona (Spain), or by email at [proteccio.dades@fcbarcelona.cat](mailto:proteccio.dades@fcbarcelona.cat).

Likewise, you may revoke the consent granted or you may object to the processing of your data, provided this is possible in accordance with current regulations. Notwithstanding the foregoing, if you revoke consent or object to any processing, this may mean that we cannot provide certain services.

If you have any doubts, questions or complaints about the way in which we process your personal data, please contact our Data Protection Officer at the email address [dpo@fcbarcelona.cat](mailto:dpo@fcbarcelona.cat) or by

writing to us at Avda. Arístides Maillol, S/N, 08028, Barcelona (Spain), with the reference “DPO”. If you do not receive a response within a reasonable period of time, you may file a complaint with the Spanish Data Protection Authority.