



## LEGIA WARSZAWA S.A.

Łazienkowska 3, 00-449 Warsaw  
tel. +48 22 318 20 00  
fax +48 22 318 20 01  
info@legia.pl | legia.com

### PRIVACY POLICY OF LEGIA WARSZAWA S.A.

#### 1. What is the purpose of the Privacy Policy?

Legia Warszawa S.A. ("**We**" or "**Legia**") pays special attention to the protection of privacy and personal data. Our priority is to process your personal data in a safe and lawful manner, in particular in accordance with the Regulation 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 on the free movement of such data, and repealing Directive 95/46/EC („**GDPR**").

In this Privacy Policy ("**Privacy Policy**") we inform and explain how we use the personal data we collect or that are made available to us.

Your personal data may be processed by us if, for example, you have been at a Legia match, you have been or are our client, you have a Legia fan card ("Fan Card"), you have used our website, you have contacted us about other matters, etc.

Basic information related to the processing of your personal data by us in connection with the activities of the FanStore can be found here: <https://sklep.legia.com/polityka-prywatnosci/>.

**We provide you with basic information about the processing, including the purposes and legal basis for the processing of your personal data at the time or in connection with the collection of your personal data. This Privacy Policy is only intended to supplement this information.**

**It may be the case that we process your personal data for purposes other than those indicated in this Privacy Policy, in which case the information about the processing you received from us at the time or in connection with our collection of your personal data is binding.**

In this Privacy Policy we have also included information concerning the rights you have as a result of the fact that we process your personal data, as well as how you can exercise these rights.

#### 2. Who is the controller of your personal data? How to contact us?

The personal data controller is Legia Warszawa S.A. with its registered seat in Warsaw, address: Łazienkowska 3 street, 00-449 Warsaw.

Legia appointed data protection officer ("DPO") – Tomasz Rutkowski.

You can contact our DPO us by traditional post, by sending an e-mail to daneosobowe@legia.pl or by phone +48 882 094 963.

#### 3. What are the purposes of processing your personal data?

We provide you with basic information about the processing, including the purposes for which your personal data is processed, at the time it is collected from you. Notwithstanding the above, below you will find information on the most common cases where we process your personal data.





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Name of the purpose	Description of the purpose	Legal basis for personal data processing
<b>Pre-contractual actions (including inquiries)</b>	Taking, at your request, actions necessary before concluding an agreement concerning Legia's services, in particular an agreement to purchase a ticket or a pass (including a VIP pass); this applies in particular to presenting Legia's offer, conducting talks in order to conclude an agreement.	Personal data is necessary in order to take steps prior to entering into a contract (Art. 6 sec. 1 letter b) of the GDPR)
<b>Conclusion and performance of a contract</b>	Conclusion and performance of a contract for the services provided by Legia, in particular regarding: <ul style="list-style-type: none"><li>– purchase of a ticket/pass (allowing you to participate in a mass event, i.e. the match for which you bought the ticket);</li><li>– your participation in Legia's loyalty programs such as CashBack;</li><li>– the purchase and maintenance of your FanCard, including handling each of your orders and purchases using the FanCard, including handling electronic payments and delivery of the purchased goods.</li></ul>	Personal data is necessary for conclusion and performance of a contract (Art. 6 sec. 1 letter b) of the GDPR)
<b>Inquiries, complaints, requests</b>	Handling and responding to your inquiries, complaints or requests by Legia.	Personal data is necessary for performance of a contract (Art. 6 sec. 1 letter b) of the GDPR) or fulfilment of Legia's legitimate interest consisting in opportunity to consider and respond to your inquiry, complaint or request (Art. 6 sec. 1 letter f) of the GDPR) or fulfilment of a legal obligation related to the handling of your complaint (Art. 6 sec. 1 letter c) of the GDPR)

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<b>Legal obligations</b>	<p>Fulfilment of the Legia's legal obligations pursuant to generally applicable laws, including in particular:</p> <ul style="list-style-type: none"><li>– the legal obligations of Legia as an organiser of a mass event in the form of a football match, which includes in particular video and sound surveillance of the stadium during the match as well as collection and storage of Your name, family name and national identity number (PESEL);</li><li>– obligations arising from accounting and tax regulations;</li><li>– obligations to consumers.</li></ul>	<p>Personal data is necessary for fulfilment of a legal obligation of Legia (Art. 6 sec. 1 letter c) of the GDPR)</p>
<b>Ensuring safety of matches involving Legia and efficient organisation and conduct of a mass event</b>	<p>Ensuring safety of matches involving Legia and efficient organisation and conduct of a mass event – in the extent not required by mass event safety regulations</p>	<p>Personal data is necessary for fulfilment of Legia's legitimate interest consisting in necessity to ensure safety of matches involving Legia (Art. 6 sec. 1 letter f) of the GDPR)</p>
<b>Legal claims</b>	<p>Establishment and exercise of legal claims by Legia or defence against legal claims.</p>	<p>Personal data is necessary for fulfilment of Legia's legitimate interest consisting in possibility to establish and exercise legal claims by Legia or defend legal claims made against Legia (Art. 6 sec. 1 letter f) of the GDPR)</p>
<b>Evaluation of satisfaction with Legia's products and services</b>	<p>Evaluation of satisfaction with our products and services and the quality of customer service.</p>	<p>Personal data is necessary for fulfilment of Legia's legitimate interest consisting in possibility to evaluate satisfaction with Legia's products and services (Art. 6 sec. 1 letter f) of the GDPR)</p>
<b>Analysis (among others statistical and concerning relevant characteristics of recipients of our services and products)</b>	<p>Analysis conducted in order to better prepare our offer or information or to ensure a more effective reach to a selected group of recipients and in connection with affiliate marketing conducted by the Legia.</p>	<p>Personal data is necessary for fulfilment of Legia's legitimate interest consisting in possibility to analyse relevant characteristics of recipients of Legia's services and products (Art. 6 sec. 1 letter f) of the GDPR)</p>

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<b>Use of the website</b>	Processing of personal data of users using the website (including their IP address or other identifiers collected through cookies or other similar technologies) for statistical purposes and/or for the provision of electronic services consisting in making available to users the content gathered on the website	Personal data is necessary for fulfilment of Legia's legitimate interest consisting in possibility to examine users' activity on the website in order to improve the functionalities used on the website (Art. 6 sec. 1 letter f) of the GDPR) and/or personal data is necessary for performance of a contract (Art. 6 sec. 1 letter b) of the GDPR)
<b>Information about the club's activities, marketing activities</b>	Providing information about the club's activities, the functioning of the stadium, ticket sales and marketing of Legia's services and products, and sometimes also the sponsors and partners of Legia and entities associated with Legia, i.e. Fundacja Legia Soccer Schools and Fundacja Legia, including the provision of information and offers prepared especially for you on the basis of an analysis of your shopping history and other information (e.g. birthday discounts offers to be used in time around your birthday, offers addressed solely to you in connection with your specific characteristics, e.g. place of residence, gender, age group, etc.).	Personal data is necessary for fulfilment of Legia's legitimate interest consisting in possibility to provide information about the club's activities and direct marketing (Art. 6 sec. 1 letter f) of the GDPR)  To some extent, the processing of your personal data will be based on your consent. (Art. 6 sec. 1 letter a) of the GDPR)
<b>FanStore activity</b>	We may also process your personal data in connection with the activity of FanStore. Basic information related to the processing of your personal data by us in connection with the activity of the FanStore is available at [ <a href="https://sklep.legia.com/polityka-prywatnosci/">https://sklep.legia.com/polityka-prywatnosci/</a> ].	
<b>Social media</b>	We also process personal data in connection with our social media activities. You can find more information in this respect on our pages on individual portals such as Facebook or Instagram.	

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### Social media links

On Legia's website there are links to external social networks (YouTube, Facebook, Twitter, Instagram, Google+). The functions assigned to each link, in particular the transfer of information and personal data, are only activated when you click on the link. In this case, the so-called plugins of the individual social networks are activated and your browser establishes a direct connection to the servers of the social network and you are redirected to the website of the social network. The portal provider will receive information that you have visited our site before visiting the site of this portal (even if you are not registered or logged in to this portal). Such information (including your IP address) will be sent directly from your browser to the social networking servers (usually located in the United States) and stored there. If you are logged in, this portal will immediately associate your visit to the portal with your account on the portal.

If you do not wish your personal data to be transferred to social networking providers, do not click on the links of these social networking sites. If you do not wish the provider to link your visit to this portal to your profile, make sure that you have logged out of the portal beforehand.

More information about the processing of personal data by individual portals can be found on their websites.

### 4. To whom do we provide your personal data?

Apart from Legia's staff, your personal data may be provided by us to the following entities:

- a. service providers to Legia, in particular, IT service providers, including the maintenance and operation of our website and providers of IT systems used for the maintenance and operation of systems used to distribute tickets for matches or to make purchases from Legia, entities whose access to your personal information is necessary in connection with your participation in the Cashback World program, entities providing accounting, legal, auditing, consulting, advisory, insurance, security and delivery services, destruction or archiving of documents, agencies providing marketing services to Legia, as well as online payment processors, banks;
- b. entities from the capital group of Legia, i.e. Fundacja Legia Soccer Schools and Fundacja Legia.

Your personal data will also be made available to public authorities, including courts, upon their legitimate request or for the purpose of defending or exercising legal claims, or if such obligation arises under the law, or to entities entitled to obtain such personal data under the law on the organisation of mass events, e.g. the Polish Football Association, the entity managing the games in which Legia participates, or Police.

### 5. Do we transfer your personal data outside the European Economic Area or to international organisations?

In principle, your personal data will not be transferred outside the European Economic Area ("EEA") or to international organisations.

In certain cases, we may transfer your personal data to so-called third countries. The level of personal data protection outside the EEA differs from that provided by Polish and European law. We therefore only transfer your personal data outside the EEA if necessary and with an adequate level of protection of your personal data. You have the right to obtain copies of standard contractual clauses or other appropriate safeguards for the transfer of personal data outside the EEA through Legia.





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### 6. For how long do we store your personal data?

We store your personal data for the period necessary to achieve purposes for which we are processing them.

We will store your personal data:

- In the case of personal data processed in connection with a contract to which you are a party and for the purpose of performing the contract, we will process your personal data for the duration of the contract concerned (according to its type), in particular, (i) during the validity period of the Fan Card, (ii) for the duration of the pass, (iii) for the period necessary to process your order, purchase a ticket or handle a complaint or other type of request, (iv) during your participation in the loyalty program, (v) for the duration of the negotiations concerning the conclusion of a contract for the sale of a VIP pass, however, we may extend the above mentioned periods by the statute of limitations for your or our claims arising from the law, if the processing of these personal data is necessary for the purpose of establishing or exercising these claims, as well as for the purpose of defending against such claims, and by periods of judicial, arbitration, administrative etc. proceedings relating thereto;
- We will process your personal data for the period necessary to provide our service and enable you to enter and participate in Legia match as a fan and to fulfil the legal obligations related to your entry into Legia match as a fan (e.g. your image recorded by the surveillance system required by law will be stored for at least 30 days but not longer than 90 days).

In addition, your personal data may be stored longer if Legia is required to do so by the competent authorities.

- In order to pursue our legitimate interests, i.e. to establish and exercise our claims or to defend against claims - for the period of limitation of your claims against us or our claims against you under the law (e.g. the limitation period for business-related claims is 3 years, and the general limitation period for claims is 6 years); the above mentioned periods of storage of personal data may change along with the amendment of generally applicable laws) or the statute of limitations of tax obligations related to business events (purchase of services or goods) to which you were a party and for the duration of court, arbitration, etc. proceedings related to such claims.
- To pursue our legitimate interests, i.e. to answer your question, complaint, request or suggestion - for the period necessary to answer, not exceeding 30 days, however, we may extend this period by the statute of limitations for your or our claims under the law, if processing of this personal data is necessary to establish or exercise claim, as well as to defend against such claims.
- For the purpose of fulfilling our obligations under the law (e.g. accounting or tax or product liability regulations) - for the period resulting from such regulations (e.g. for billing purposes your personal data will be stored for 5 years starting from the end of the calendar year in which the contractual tax payment deadline expired).
- If you object at any time for reasons related to your specific situation - to the processing of your personal data on the basis of our legitimate interest (based on Art. 6 sec. 1 letter f) of the GDPR), including profiling, we will cease processing your personal data, unless Legia demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

### 7. What are your rights?

As Legia processes your personal data, you have a number of rights as described below.





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To exercise these rights or to obtain additional information in this regard, we encourage you to contact us, in particular by e-mail: [daneosobowe@legia.pl](mailto:daneosobowe@legia.pl).

If you request Legia to exercise your rights, in case of reasonable doubt about your identity, Legia may request additional information necessary to confirm your identity.

Legia will respond to requests without undue delay, possibly within one month of receiving the request.

If Legia demonstrates that your requests are manifestly unjustified or excessive, in particular due to its continuing nature, Legia may:

- a. charge a reasonable fee, taking into account the administrative costs of providing information, communicating or taking the requested action; or
- b. refuse to act on the request.

### (1) Information concerning the right of access to personal data

You have the right to request access to your personal data, including in particular information on whether Legia is processing your personal data and the scope of personal data held by Legia, the purposes of the processing of personal data, the categories of recipients of your personal data, the planned period of storage of personal data, your rights concerning personal data, as well as information on the sources of obtaining your personal data by Legia, if they were not collected from you. You also have the right to obtain a copy of your personal data, provided that obtaining the first copy of your personal data is free of charge, and obtaining any subsequent copy may involve payment of a reasonable fee taking into account the administrative costs of preparing such a copy of the personal data.

### (2) Information concerning the right to request the rectification of personal data

You have the right to request the immediate rectification of inaccurate personal data or, taking into account the purposes of the processing, supplementation of incomplete personal data.

### (3) Information concerning the right to request erasure of personal data (right to be forgotten)

You have the right to request immediate erasure of your personal data if one of the following circumstances applies:

- a. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b. you have raised an effective objection to processing;
- c. personal data were unlawfully processed;
- d. personal data must be erased in order to comply with a legal obligation;
- e. you have withdrawn your consent to the processing of personal data and your personal data has been processed on the basis of your consent and there is no other legal basis for processing it,
- f. personal data were collected in connection with the offer of information society services referred to in Art. 8 sec. 1 of the GDPR.

However, you will not be able to exercise your right to erase your personal data if, among other things, such personal data is necessary to establish or exercise claim or to defend against claim.





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### **(4) Information concerning the right to request a restriction of personal data processing**

You have the right to request restriction of the processing of your personal data, for example when:

- you question the accuracy of your personal data processed by us - in this case, you may request that the processing be restricted for a period of time to verify the accuracy of your personal data;
- in your opinion, the processing of your personal data by us is unlawful, but at the same time you object to the erasure of this personal data by requesting that its use be restricted instead;
- we no longer need your personal data for our purposes, but you need it to establish, exercise your claims or defend against claims;
- you have objected to our processing of your personal data due to your specific situation - in this case you may request that the processing be restricted until it is determined whether our legitimate interests in processing personal data take precedence over the grounds for your objection.

If the processing of your personal data is restricted, we will only be able to store it and, in addition, use it for the purpose of establishing, exercising or defending a claim, to protect the rights of another natural or legal person or for important public interest reasons of the European Union or a Member State. We will only be able to take other actions if you have given your consent.

### **(5) Information concerning the right to transfer personal data**

You have the right to receive, in a structured, commonly used machine-readable format, the personal data that you have provided to Legia and you have the right to transmit this personal data to another controller without hindrance from Legia, if:

- a. processing is carried out on the basis of your consent or on the basis of a contract with you, and at the same time
- b. the processing is carried out by automated means.

In the situation indicated above, you also have the right to request that the personal data be transmitted by Legia directly to another personal data controller, if technically possible.

### **(6) Information concerning the right to object to the processing of personal data**

You have the right to object at any time - for reasons connected with your specific situation - to the processing of your personal data if the legal basis for the processing is the legitimate interest of Legia. In this case, you should indicate the specific situation that you believe justifies our discontinuation of the processing of your personal data you have objected to.

As a result of an objection, Legia will cease processing your personal data unless Legia demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

If personal data is processed for the purposes of direct marketing, you may at any time object to such processing, including profiling, without having to demonstrate reasons related to your specific situation, and Legia is required to immediately cease such processing.







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### **(7) Information concerning the right to withdraw consent**

Whenever the processing of personal data is based on your consent, you have the right to withdraw it at any time. Withdrawal of consent does not affect the lawfulness of the processing of personal data which was carried out on the basis of consent before its withdrawal.

### **(8) Information concerning the right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with the competent supervisory authority - in Poland, with the President of the Personal Data Protection Office, if you believe that the processing of personal data concerning you is in breach of the provisions of the GDPR.

### **8. Is the provision of personal data a statutory or contractual requirement or a condition for concluding a contract? What are the possible consequences of not providing personal data?**

All personal data you provide voluntarily, but some of them are necessary for the performance of the contract concluded with you, in particular maintenance of the Fan Card, making and performance of orders and purchases of tickets or passes for matches (data allowing your identification, data necessary for delivery), fulfilment of obligations resulting from the law (e.g. PESEL number in the scope of obligations resulting from the regulations defining the rules of mass events), issuing appropriate tax documents (NIP number), and not providing them will make it impossible to perform these actions.

### **9. Information concerning automated decisions and profiling**

Legia uses profiling activities to carry out its marketing operations, i.e. it analyses information about you and assesses your purchasing preferences in order to provide you with an offer tailored to your characteristics or matching, in Legia's opinion, your needs and requirements.

In addition, Legia conducts profiling activities to monitor the Internet traffic of users of Legia's websites (in particular by identifying the websites from which users have accessed Legia's websites) in connection with affiliate marketing conducted by Legia.

### **10. Amendments to the Privacy Policy**

This Privacy Policy may be amended and updated. If you want to be kept up to date on how we process your personal data, please visit this page from time to time.

### **11. Information concerning cookies**

Cookies are text files that are stored on your computer when you visit websites such as our website.

Information concerning the cookies we use can be found here <https://legia.com/cookies>. Please note that you can disable the storage of cookies on your computer at any time by changing the settings of your browser.





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### 12. Information concerning on-demand audio-visual media service

In connection with the provision of on-demand audiovisual media services, in order to fulfill the information obligation under Article 47c and n. of the Act of 29 December 1992 on radio and television, including, in particular, providing users with easy, direct and continuous access to information enabling identification of the service and the entity providing the on-demand audio-visual media service, hereunder you will find detailed information in the above regard ([https://pliki.legia.pl/\[LEGIA\]%20Klauzula%20informacyjna\\_Audiowizualna%20us%C5%82uga%20medialna.pdf](https://pliki.legia.pl/[LEGIA]%20Klauzula%20informacyjna_Audiowizualna%20us%C5%82uga%20medialna.pdf)).

You can find the above file along with information to identify the service and the entity providing the on-demand audiovisual media service in the section called "Regulaminy" [*eng. Regulations*] at our official website legia.com.

