

PRIVACY NOTICE PURSUANT TO EU REGULATION 679/2016 (“GDPR”)

Dear Friend,

F.C. Internazionale Milano S.p.A. (hereinafter, “*Inter*”), with registered office in 20124 Milan, Viale della Liberazione no. 16/18, share capital of Euro 19,195,313.34, fiscal code and number of registration with the Companies’ Register of Milan 80066310154, as Data Controller, provides you with this Privacy Notice pursuant to section 13 of the GDPR.

1. Data processed, purposes and legal grounds

Inter processes the personal data of the subjects involved in the processing (hereinafter, the “*Data Subjects*”) and in particular of the participants in the Inter Academy project – [Japan] (hereinafter, the “*Academy Project*”). The personal data are provided by the Data Subject / by the Data subject’s guardian or collected during the Academy Project, for the following purposes: a) requirements related to the Data Subject’s enrolment and attendance in the Academy Project and further purposes connected to the Data Subject’s enrolment and attendance in the Academy Project, such as providing information/material related to the Academy Project; b) administrative/accounting purposes deriving from enrolment in the Academy Project; c) statistical purposes on anonymised data; d) delivery of newsletters on the activities of the team “F.C. Internazionale” and promotional communications concerning discounts, offers, services, membership programmes and events of Inter and Inter Store; e) purposes of delivery of customer satisfaction surveys or questionnaires with regard to Inter’s products and services; f) profiling purposes; g) delivery of commercial and promotional communications concerning products and/or services from third-party companies partnering with Inter; h) for the purposes of capturing Data Subject’s image and voice for the creation of audio-visual and multimedia content (hereinafter, the “*Contents*”) that may be disseminated, in whole or in part, through any distribution channel or forms of remote dissemination to the public. The legal basis for the data processing is the execution of a contract (for the purposes referred to under letters a) and b)), and Data Subject’s consent (for the purposes indicated under letters d), e), f), g), h)). Please note that the personal data that may be processed by Inter for the purposes indicated under paragraph 1 letter a) above may include what is known as “sensitive” data related to the health status of the Data Subject. These data may be collected and processed by the Health Department of Inter, Partner and/or their consultants appointed as Data Processors for the pursuit of the medical profession, for purposes related to the management of the Data Subject’s participation in the Academy Project (including the completion of clinical and diagnostic tests required by applicable law and the fulfilment of insurance obligations).

2. Means of processing

Inter hereby informs you that: a) for the abovementioned purposes the Data Subject’s data shall be processed also by computer, electronic, hard-copy and manual means, in compliance with the confidentiality and safety rules provided by the law; b) in case of expressed consent to the profiling activity referred to under paragraph 1 letter (f) above, this will entail automated activity in order to assign the Data Subject to a category of subjects with similar characteristics (in terms of purchase preferences) on the basis of the services previously enjoyed, any market surveys that may have been completed, the relevant demographic class and any activities attended during the execution of the Academy Project.

3. Optional disclosure of data

The provision of the Data is optional. However, any refusal to provide the data for purposes relating to the enrolment and attendance in the Academy Project under paragraph 1 letters a) and b) shall make it impossible to enrol in the Academy Project and enjoy the related services. At the same time, taking into account the modalities of performance of the activities included in the Academy Project, refusal to provide consent to the processing referred to under paragraph 1 letter h) above shall make it impossible to enrol and participate in the Academy Project. Also, any later opposition to or revocation of the processing of personal data for the aforementioned purposes shall result in immediate withdrawal from participation in the Academy Project on the part of the Data Subject. The personal data related to the Data Subject’s health status shall be processed by the Health Department of Inter and/or any independent contractors only under express consent. The Data Subject’s consent is not required for processing anonymous data for the purposes provided in paragraph 1 letter c). Any refusal to provide consent to the data processing for the further purposes

referred to under paragraph 1), letters d), e), f) and g), namely for the delivery of newsletters on the activities of the team “F.C. Internazionale”, delivery of customer satisfaction surveys, profiling, shall not lead to any consequences except that it will be impossible to be informed about any market surveys and any customer satisfaction, marketing and promotional-advertising initiatives from Inter or companies partnering with Inter, as well as to receive commercial communications of interest.

4. Dissemination and communication of data

The data shall not be disseminated, with the exception of the processing under paragraph 1 letter h) above. Within the organisation of the Data Controller, the data may be processed by the relevant offices entrusted with the execution of the processing activities (e.g., Administration, Commercial, Marketing, IT). In the performance of its activities and of its promotional-advertising, marketing, merchandising and sponsorship initiatives, Inter, as Data Controller, may communicate the Data Subject’s data to the third parties mentioned in Note 1 and appointed as Data Processors for the purposes of managing enrolment and attendance in the Academy Project or for any further purposes to which the Data Subject has provided consent. The complete list of Data Processors appointed by Inter can be easily consulted at no charge by sending a request to the email address indicated under paragraph 8 of this Privacy Notice.

5. Location and duration of data storage

Personal data shall be stored on servers located within the European Union. Inter may transfer personal data to companies belonging to the Inter/Suning group, some of which are based in the People's Republic of China, for the purposes of the planning and organising business activity carried out by Inter. With regard to the aforementioned country, there is no adequacy decision adopted by the European Commission. Before proceeding with the transfer of data towards third-party countries that are not members of the European Union for which there is no adequacy decision, Inter adopts all appropriate safeguards in accordance with applicable legislation, so that the data transfer is fully lawful and the rights of the Data Subject are safeguarded, even in the absence of consent. In particular, Inter adopts the system of standard contractual clauses approved by the European Commission for the transfer of Data to non-European Union countries. Any personal data collected for the purposes indicated under paragraph 1 (a) and (b) shall be retained for as long as necessary for the attendance in the Academy Project, and subsequently for a period not exceeding the statutory limitation period. Personal data collected for the purposes of processing indicated under paragraph 1 (d), (e) and (g) shall be retained until the Data Subject withdraws his/her consent to receiving commercial communications or requests the deletion of data, except for cases where the Data Controller needs to retain such data to defend its rights in relation to any disputes that are on-going at the time of the request, or upon formal request from public authorities. The Data collected for the purposes of processing indicated under paragraph 1(f) shall be retained until the Data Subject withdraws consent to the marketing activities described therein, or presents a request for deletion of such personal data, subject to the foregoing. The Data Subject’s data included in the Contents (such as voice, image and biographical data) shall be processed for as long as necessary, and to the extent necessary, for the use of the Contents as indicated in this privacy notice and in compliance with applicable law.

6. Data subject’s rights

The data subject has the right to: a) obtain the termination of processing for direct marketing purposes, including in relation to services identical to those already provided by our company (i.e., right of rejection); b) obtain information in relation to the purposes for which personal data are processed, to the period of processing and to the subjects to whom the data are communicated (i.e., right of access); c) obtain the rectification or updating of incorrect data concerning the Data Subject (i.e., right to rectification); d) obtain the deletion of data concerning the Data Subject in the following cases: (i) the data are no longer necessary for the purposes for which they were collected; (ii) the Data Subject has withdrawn his/her consent to the processing of data, if these are processed on the basis of his consent; (iii) the Data Subject has opposed the processing of personal data concerning him/her, in case these are processed for our legitimate interest; or (iv) the processing of data does not comply with the law. However, it is to be noted that the retention of data by Inter is also lawful if it is necessary in order to fulfil a legal obligation or to ascertain, exercise or defend a right in court (i.e., cancellation right); e) obtain that the personal data concerning the Data Subject are only stored without any further use in the following cases: (i) the Data Subject disputes the accuracy of the data, for the period that is necessary for allowing Inter to verify the accuracy of such personal data; (ii) the processing is unlawful but the Data Subject objects to our deletion of the personal data in any case; (iii) the

personal data are necessary for ascertaining, exercising or defending a right in court; (iv) the Data Subject has opposed the processing and verification and a decision about whether Inter's legitimate interest in the processing overrides that is pending (i.e., limitation right); f) receive in a commonly used and machine-readable and interoperable format all personal data concerning the Data Subject, if these are processed under a contract or on the basis of the Data Subject's consent (i.e., right to portability).

Please also note that you have the right to contact the Data Protection Authority in order to enforce your rights with regard to the processing of your personal data.

7. Creation of Content

Subject to express consent, Inter and its affiliates may also capture, including through third parties, the Data Subject's image and voice and use such images (and the name of the Data Subject) to create the Content relating to the Academy Project as referred to under paragraph 1(h). Inter shall have the possibility, but not the obligation, to reproduce the Contents as many times as considered necessary and to distribute it for promotional, commercial and commemorative purposes. Inter shall have the possibility, but not the obligation, to: (i) reproduce and/or transfer to other formats (format shifting) and/or reproduce in temporary and/or permanent copies, in any manner and/or form, with any reproduction procedure, the images and/or any personal data contained therein; (ii) process and/or edit, re-edit, in whole and/or in part, by any means and on any medium, images and personal data; (iii) publish, perform, represent, transmit, communicate to the public, make available to the public, distribute, rent and/or lend, and in any case use the Contents in any form, in whole and/or in part; (iv) use the images and/or the personal data, alone and/or together with those of others, in any form and/or manner, through any media and/or means of communication to the public (including television media, websites and social media of any kind), in any network, public and/or private, in whole and/or in part; (v) print and/or publish and/or distribute the images, the relative contents and/or the personal data, alone and/or together with those of others, in any type of editorial product; (vi) use the Contents and/or the personal data in communications of any kind from Inter and/or its assignees, as well as for advertising and/or promotional purposes for the services and products offered by Inter; transfer the Contents to third parties for promotional purposes. The Data Subject shall not have the right to claim any remuneration in connection with such uses.

8. Data controller's contact details

The Data Controller pursuant to art. 24 of the GDPR is F.C. Internazionale Milano S.p.A., with registered office in 20124 Milan, Viale della Liberazione no. 16/18, share capital of Euro 19,195,313.34, number of registration with the Companies' Register of Milan 80066310154. The Data Controller can be contacted for any requests or reports at the following: UFFICIO DEL TITOLARE DEL TRATTAMENTO DATI – 20124 Milan, Viale della Liberazione no. 16/18 - TEL. +39 02 82719080. Inter has appointed a Data Protection Officer (also known as DPO) pursuant to section 37 et seq. of the GDPR, who is domiciled for the position at the address of F.C. Internazionale Milano S.p.A. and can be contacted at the email address privacy@inter.it for any matter concerning the data processing. By sending an email to privacy@inter.it, the Data Subject can also exercise any rights referred to under paragraph 6 of this Privacy Notice.

Note 1: a) Mailing Companies, b) Shippers, c) Couriers, d) Companies that generally carry out packaging, delivery and transport of correspondence; e) Companies and/or associates that manage on-site operations related to the Academy Project; f) Subsidiaries and affiliated companies pursuant to art. 2359 of the civil code; g) Football Schools; h) Companies affiliated with Inter; i) Partner hotels; l) consultants of Inter; m) companies that conduct sports marketing activities and activities in collaboration and/or co-marketing with Inter n) companies that produce audio-visual and multimedia content. An updated list of the above-mentioned companies (i.e., Data Processors pursuant to section 28 of the GDPR) is available at the registered office of Inter and may be consulted by sending a request to the email address privacy@inter.it.

CONSENT FORM

The undersigned _____, on his/her own behalf or in his/her capacity as guardian for the Data Subject _____, hereby authorises the processing of his/her data or the Data Subject's data for the purposes referred to under paragraph 1, letters a) and b) of the Privacy Notice, and in addition

- to the processing of any sensitive data of the Data Subject by the Health Department of Inter and/or their consultants appointed as data processor for the pursuit of the medical profession, for purposes related to the management of the Data Subject's participation in the Academy Project (including the completion of clinical and diagnostic tests required by applicable law and the fulfilment of insurance obligations) → *SUCH CONSENT IS NECESSARY FOR THE CORRECT MANAGEMENT OF THE ENROLLMENT AND ATTENDANCE IN THE ACADEMY PROJECT*;
- to the processing of his/her own data and the Data Subject's data for the delivery of newsletters on the activities of the team "F.C. Internazionale" and promotional communications concerning discounts, offers, services, membership programmes and events of Inter and Inter Store (paragraph 1, letter d) of the Privacy Notice);
- to the processing of his/her own data and the Data Subject's data for the delivery of opinion surveys and questionnaires on the Data Subject's satisfaction with regard to products and services offered by Inter (paragraph 1, letter e));
- to the processing of his/her own data and the Data Subject's data for profiling activities, such as analysing the Data Subject's preferences through automated means in order to improve our commercial offerings (paragraph 1, letter f));
- to the processing of his/her own data and the Data Subject's data for the delivery of commercial and promotional communications concerning products and/or services of Inter's third-party partner companies (paragraph 1, letter g));
- to the processing of his/her own data and the Data Subject's data for the capture of the Data Subject's image and voice for the creation of Contents that may be disseminated, in whole and/or in part, through any distribution channel or forms of remote dissemination to the public, as further indicated under paragraph 7 of the Privacy Notice (paragraph 1, letter h)) → *SUCH CONSENT IS NECESSARY FOR THE CORRECT MANAGEMENT OF ENROLLMENT AND ATTENDANCE IN THE ACADEMY PROJECT*