



General Privacy Policy (effective from: 15 April 2026)



About us

If you are reading this privacy policy (“**Policy**”), it is because you have come into contact in some way with Virgin Active Italia S.p.A. (“**Virgin**”, “**we**”, “**our**”, “**us**”), with its registered office at Corso Como 15, 20154 Milan, Tax Code and VAT Number 03641880962, which operates the *fitness* and *wellness* centres listed on its website www.virginactive.it providing its services to customers with a focus on innovation and enjoyment.

We provide this Policy in our capacity as **the Data Controller** of your **Personal Data**. We invite you to read it carefully as it contains important information on the protection of your **Personal Data** to help you better understand how we process your data, for what purposes, and how you can control your information.

To this end, at the end of this document, you will find the **Definitions**, which refer to more detailed explanations of the terms in capital letters.



What data we collect and process

The types of **Personal Data** we collect depend on how you interact with us. The following categories may be provided directly by you or by third parties:

- **Identification data:** any data that identifies you, such as your first name, surname, tax reference number, ID card or passport details, and your account details (e.g. your username).
- **Contact data:** any information that allows us to contact you by any means, such as postal and email addresses, mobile phone number, push notifications, social media accounts. This category also includes IDs shared by social media platforms (e.g. Meta) that allow us to show you our adverts. Social media platforms act as **joint controllers** with us when we use their commercial targeting services.
- **Data compiled:** any information you enter into our **forms**, including those contained in the Virgin fitness services membership agreement.
- **Images:** images or videos of you when you visit our **Clubs**, attend **Events** or when you sign up and become a Virgin member (when you sign up at the Club, we take a profile photo of you for immediate recognition when you pass through the turnstiles).
- **Access data:** your presence at a specific **Club** at a specific time based on your Virgin membership ID check-in, the completion of our **forms**, or via images.
- **Location data:** determined by entering an address, a city, a postcode or a **Club**, or when you consent to sharing your location via your **IP address** or the **Device's** GPS. We do our utmost to ensure that this Information is not used to deduce your Sensitive Data.
- **Device data:** your **IP address**, the date, time and URL requested, **unique identifiers** and other information such as your **browser** or **device** type, the website you came from (referrer), the information you viewed and any other actions you took on our **Pages** or **Apps**. This information is collected using **Cookies**, **SDKs** and **other tracking technologies** present on your **browser** or **device**. You can find the full list of **cookies** and **SDKs** in the footer and in the privacy settings of our **Pages** and **Apps**. You can restrict our collection of your location by changing your **browser** or **device** settings, as set out in the ‘How to control your data and manage your choices’ section below.
- **Payment data:** certain payment details (e.g., IBAN) provided to facilitate the monthly payment of your subscription fee, the purchase of merchandise or other Services, or to pay Virgin membership fees for yourself or a third party, including your credit/debit card details which, where available, you may add and save to your profile within the App to make future purchases. Please note that when payment is made by credit/debit card, your credit/debit card details are processed solely by payment gateways/financial institutions acting as independent **data controllers**, and we only see confirmation that the payment transaction has been completed.
- **Sensitive Data:** primarily data relating to your health (for example, your medical certificate, height, weight and/or other data relating to physical activity, as well as measurements relating to your body composition that we record via the App, etc.). This information is provided directly by you as a requirement for registration or through the use of our **Services** (for example, to record your workouts).
- **Data derived from your activity:** information based on your online and offline interactions with our **Forms** and **Services**

(for example, whether you are interested in specific group courses, training days or time slots; when you contact us by email, telephone regarding our products or request further information, we will collect and retain a record of your contact details, your communications and our responses) which enable us to create inferred data through their **Combination and/or Cross-referencing**. We do not infer information based on your Sensitive Data.

- **Third-party data:** any Identification Data, Contact Data or Data compiled relating to a person other than yourself, such as parents, doctors, friends, spouses, guests, partners, children, etc., which we may process for the provision of our **Services**. If you provide us with third-party data (for example, guests, payment details for gifting a subscription, or details of a third-party payer for your subscription), you act as an independent data controller and will be responsible for having shared such information with us. We therefore ask you to verify in advance that such third party has legally authorised you to share this information with us (i.e. that you have been previously and duly authorised by such third parties to share their information with us or for any other legitimate reason), as you will be required to fully indemnify us (granting the broadest possible indemnity in favour of Virgin) against any dispute, complaint, claim and/or claim for damages that may arise from the processing of **Personal Data** of such third parties in breach of data protection law.
- **Joint Data:** any contact information shared by **Business Partners** (e.g., social media, co-branding companies, etc.) whom we ask to send or display our advertisements to their users based on certain criteria/interests. These so-called micro-targeting and/or retargeting activities generally do not involve the direct collection of **Personal Data** by us. Instead, they usually enable us to obtain **aggregated data** on the effectiveness of such adverts or lead to the registration of new members via our **forms**. In accordance with European legislation, when carrying out these activities, both we and our **Business Partners** make every reasonable effort to verify the legitimacy of the data (including joint controller agreements) prior to its use. You may request further information regarding our list of active **business partners** and the obligations of the respective parties by writing to Virgin's Data Protection Officer, i.e. the person responsible for assisting us in complying with privacy regulations and monitoring compliance ("**Data Protection Officer**" or '**DPO**'), who is available to provide any information regarding the processing of your personal data at the following address dpofat@virginactive.it.

The way you interact with us determines the types of data we collect and the purposes for which we process them, as set out in *the table* below. You are not obliged to provide us with any data, but if you do not do so when requested or if you provide incorrect or untrue data, this will affect some or all of our purposes and **Services**.

Digital user

If you visit our **Pages** and/or **Apps**, we process your data as set out below.

 Purpose	 Data	 Legal basis	 Fully automated means	 Retention period	 Recipients
To respond to your enquiries addressed to Virgin in any way (for example, via the Website, by email, chat, instant messaging via WhatsApp, phone calls and/or by completing any online or paper form)	Identification data, Contact details, Data compiled	 Your request	No	Completion of your request	Staff, Service providers, Authorities.
To provide our Services (e.g., e-commerce, Events) and related support, including assistance and contact activities, including via the App (e.g., through in-app messages and push notifications), connected to the activation, use and the improvement of the Services purchased.	Identification data, Contact details, Data compiled, Location data, Device data, Payment data, Data derived from your	 Contract / terms and conditions	No	Fulfilment of the contract	Staff, Service providers, Authorities.

Send marketing communications /relational and general surveys (via email, telephone, text message, instant messaging, push notifications, including on the App, etc.).	Identification, Contact data, joint Data, aggregated data	 Consent	No	2 years or up to when the consent to marketing is not withdrawn.	Staff, Service providers, Business partners
Classification of marketing communications based on objective criteria rather than inferred ones (e.g., gender, location and purchases).	Identification data, Location data, aggregated data	 Our legitimate interest in sharing relevant content that does not bother	No		Staff, Service providers, Business partners
To personalise our Services , including providing content that may be useful to you, including based on responses provided in surveys, which may be linked to your profile to update your preferences and improve the personalisation of the Services and the content displayed.	Identification data, Location data, Compiled data, Aggregated data , Data derived from your activity, Device data, Access data.	 Consent	No	1 year or until consent is withdrawn	Staff, Service providers.
To carry out retargeting on social media (e.g. Meta) and other display platforms.	Contact data, Device data, Data derived from your activity.		Yes		Staff, Service providers, Business partners
To analyse and improve our Services and create new services and features	Location data, Data compiled, Aggregated data , Data derived from your activity	 Our legitimate interest in creating and maintain Services that are truly useful to you	No	1 year for Personal Data 5 years for aggregated Data	Staff, service providers.

If you visit our **Clubs** (for example, as a guest of another member, with a Guest Pass, or because you are interested in visiting our Clubs as a potential member), we process your data for the same purposes as above and, therefore, as if you were a digital user, as well as for the additional purposes described below:

 Purpose	 Data	 Legal basis	 Fully automated	 Retention period	 Recipients
To monitor and protect our Clubs , staff , guests and members. In this regard, a specific privacy notice for this processing is displayed at the Clubs, and specific signs/notices indicate the presence of CCTV cameras (e.g. "CCTV under CCTV surveillance")	Identification data, Images (CCTV), access Data	 The legitimate interest, both ours and that of our members, in ensuring the security of our premises and our physical safety and our guests	No	24 hours	Staff, Service providers, Authorities.
Please sign in using our forms at the entrance for security and compliance purposes (e.g. in the event of an evacuation)	Identification data, contact details, Data compiled, access Data	  Your access request and our compliance with health and safety	No	3 months	Staff, Service providers, Authorities.
Protecting you and us in the event of accidents	Identification data, Contact details, Data compiled, Sensitive data.	 Protecting your vital interests and ourselves in the event of legal proceedings legal	No	For as long as necessary	Staff, Service providers, Authorities.

Member

If you become a Virgin customer (i.e. a “member”), we process your data as if you were a digital user or a visitor (and, therefore, for the purposes described above), in addition to the purposes described below:

 Purpose	 Data	 Legal basis	 Fully automated	 Retention period	 Recipients
To provide our main Services (e.g. access to Clubs , classes) and related support.	Identification data, Contact details, Data compiled, Payment data, third-party data	 Contract / terms and conditions	No	Fulfilment of the contract	Staff, Service providers, Authorities.
To register you and recognise you as a member of a Club	Images	 Contract / Terms and Conditions	No	Contract fulfilment	Staff, Service providers, Authorities.
To receive your feedback/comments on our staff and to allow you to participate in Club initiatives	Identification data, Data compiled	 Your request	No	Processing of your request	Staff, Service providers, Authorities.
Provision of our ancillary services (e.g., App , personal training services, Club access wristband, synchronisation and sharing of your training data with your Device , body composition monitoring, booking of medical appointments for the issuing of a suitable medical certificate	Identification data, Contact details, Data compiled, Payment details, Third-party data, Sensitive data (e.g. medical certificates for membership activation and suspension)	 Your request and Contract / terms and conditions	No	Completion of your request	Staff, service providers (e.g. Flexer and Exerp), business partners (e.g. doctors, device manufacturers, affiliated medical practices, etc.).
Protecting you and us (including in the event of accidents)	Identification Data, access Data, Images, Sensitive data, including third-party data	Consent (via our Forms or your Device) / conducting or defending legal proceedings	No	As long as you are a Member	Staff, Service Providers, Authorities
Sharing of information about your subscription based on agreements (e.g. for the provision of benefits, welfare, etc.) entered into by you and us with business partners (as described in our Privacy Notice for Service Providers and Business Partners)	Identification data, Data derived from your activity, joint Data	 Our legitimate interest, as a due diligence operator, within the scope of the agreement with the Business Partner	No	Duration of the agreement with the Business Partner .	Staff, Business partners

Providing loyalty programmes (e.g. Virgin Active Loyalty Programme) in accordance with our terms and conditions (e.g. vouchers, discounts on Personal Training or free sessions, VIP experiences, access and events, free upgrades).	Identification data, Contact data, Data compiled, access Data (Sensitive Data is not used)	 Your enquiry	No	As long as you are a Member	Staff, Service Providers, Business Partners (e.g. reward providers), Authorities.
To personalise our Services, including providing you with any Content that may be useful to you (see "Digital User" above), based on your interests and your training history (e.g. personalised training programmes or subscription upgrades to your subscription).	Identification data, Location data, Data compiled, Aggregated data, Activity-derived data, Device data, access Data	 Consent	Yes. We may use analytics tools to evaluate your data, but we do not make decisions based solely on automated systems.	As long as you are a Member	Staff, Service Providers

Whether you are a digital user, a visitor or a member, we process the data you provide in accordance with applicable laws and regulations.

Furthermore, we process your data to comply with requests from the authorities, as well as to prevent fraudulent and illegal behaviour or activities that could compromise you, our security, the Services, Members and third parties generally present in our Clubs. These scenarios include the creation (within our management system) of *inactive* records relating to individuals (*members*) who, due to previous and established serious breaches of our Internal Regulations displayed in every Virgin Active Club, can no longer access our services after having been duly informed by us; furthermore, debt recovery activities also fall within this category. These processing operations are based on legal obligations incumbent upon us and on our legitimate interest. With the exception of the retention periods/criteria described in the tables above or the mandatory periods defined by law, we may process your data for these purposes for a period not exceeding 10 years from the termination of your contractual relationship with Virgin.

Where your data is

Your data may be stored, accessed, used, processed and disclosed outside your jurisdiction, including within the European Union, the United States of America or any other country where our service providers and sub-processors are located, or where their servers or cloud computing infrastructure may be hosted. We endeavour to ensure that the processing of your data by our Recipients (as defined in the tables above and who typically act as data processors) complies with applicable data protection laws, including the Italian laws to which we are subject. Where required by Italian and/or European Union data protection law, transfers of your data to Recipients outside the European Union will be subject to appropriate safeguards (such as the European Union's standard contractual clauses for data transfers between the European Union and non-EU countries), and/or other legal bases under European Union legislation. For further information on the appropriate safeguards we have implemented in relation to data transferred to third countries, please write to: dpo[at]virginactive.it. Apart from these cases, your data will not be disclosed to third parties (except to individuals, bodies or authorities to whom disclosure is mandatory under the provisions of law or regulations).

How you can control your data and your choices

Depending on how you contacted us, you may request at any time to:

- **Access your Personal Data:** we will provide the data we hold about you, such as identification details, contact details, preferences expressed, etc., together with the version of this Policy you received, when you provided it and the source of the data (if, for example, it was provided to us by a third party);
- **Exercise your right to data portability:** we will provide you with an interoperable file containing your data (CSV, JSON or HTML file);
- **Correct your Personal Data:** for example, you may ask us to amend your email address or telephone number if they are incorrect and/or out of date; in this regard, we encourage you to keep your contact details up to date at all times, so

that you can always receive service communications relating to your Club and/or membership;

- **Restrict the processing of your Personal Data:** for example, where you believe that the processing of your data is unlawful or that processing based on our legitimate interest is not appropriate;
- **Delete your Personal Data:** for example, when you no longer wish to use our **Services** or no longer want us to retain your data (subject to Virgin's right to retain data to comply with legal obligations);
- **Update your preferences for processing based on your consent:** you may ask us not to send you promotional communications and/or not to personalise our **Services**, including **Content that may be of interest to you**. More specifically:

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- Withdraw your consent for the purposes for which we collected it by writing to the contact details provided in the section *"How you can control your data and your choices"*;
 - Stop receiving promotional communications by clicking on the links contained in the text you have received;
 - Set your preferences regarding data collected by **your browser** and **device**;
 - If you wish to opt out of push notifications, you can withdraw your consent at any time, depending on the **browser** or **Device** you are using, following the instructions provided therein;
 - Block the sharing of some of your data within **programmatic advertising** platforms that allow us to send you **content that may be useful to you**, using the [AdChoices](#) tool; those provided by the [Digital Advertising Alliance](#) or the [European Interactive Digital Advertising Alliance](#) in Europe.
 - Block the sharing of certain **unique identifiers** via your **Device**. For iOS devices: you can enable the "Limit Ad Tracking" setting by going to Settings > Privacy > Advertising and selecting/tapping "Limit Ad Tracking". On the same page, you can also reset your advertising ID (known as the IDFA). For Android devices: enable the "Opt out of ad personalisation" setting by going to Settings > Privacy > Advanced > Ads and selecting/tapping "Opt out of ad personalisation".
 - Block the processing of **other tracking technologies** (e.g. pixels) in our email communications via your email application. For example, in Outlook, blocking such tracking is disabled by default, unless you click "Download images".



Contact the relevant Supervisory Authority, whose contact details are available [here](#).

In accordance with applicable data protection laws, we will respond to your request within one month of receipt (extendable by a further two months in cases of particular complexity). Please note that some of your rights may not be available (for example, the rectification of your data in CCTV footage) or may be subject to restrictions where permitted by applicable law.

You may exercise any of the rights listed above:

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- by writing to our Data Protection Officer ([dpo\[at\]virginactive.it](mailto:dpo[at]virginactive.it)) or to our Customer Service team via certified email ([servizioclientivai\[at\]pcert.postecert.it](mailto:servizioclientivai[at]pcert.postecert.it)), or by post to Virgin Active Italia S.p.A., with registered office at Corso Como 15, 20154 Milan, Tax Code and VAT Number 03641880962.
 - By writing to the third parties who have shared your data with us (e.g. **business partners**, social media platforms) via their email address or your account settings on their platforms.

In order to properly process your requests to exercise your rights, Virgin needs to identify you correctly within its systems and, to this end, we may ask you, where necessary, for additional information to help us identify you uniquely.



Recommendations for your correct use of third-party data

To protect the data of all our Members and Visitors, we would like to inform you that **taking photos or videos inside the changing rooms within our Clubs is prohibited; more generally, we recommend that you always act with respect for others**. For example, if you post on social media (or on any platforms you use) images or videos taken within the public areas of our Clubs and depicting other individuals (including other Members, Virgin employees and/or staff, or third parties in general), Virgin does not process the personal data in question in such cases, and you act as the independent data controller, assuming all related legal obligations and responsibilities. In this regard, you hereby grant us the fullest indemnity against any dispute, claim, or request for compensation for damage arising from processing, etc., that may be brought against Virgin (which, in such cases, is not the data controller). In any case, we urge you to always behave respectfully towards all such individuals, ensuring at all times that they do not object to being filmed by you, always informing them of how you will use the images depicting them and, above all, we recommend that you always seek their consent before publishing on social *media* any image that may depict them.

Furthermore, please note that **Virgin may not collect your data directly from you, but that it may be provided by third parties**; for example, this could happen if:

- one of our Members provides us with your personal data as the payer of the monthly membership fee and has therefore provided us with your credit card details or the bank account held in your name; this data may be collected at the time of our Member's registration or at a later date should a change of payment method be required;
- one of our Members invites you to our Clubs, offering you a trial lesson or a free day, or in the event that someone has purchased a membership for you;

In such cases, your personal data has been provided to Virgin by a third party (namely, our Partner who identified you as the payer, or the person you know who invited you to the Club, gave you a free trial day, or purchased a membership of which you are the beneficiary), who acts as an independent data controller and who, in these circumstances, is required to inform you

adequately that your data will be processed within the scope and for the purposes set out in this Policy. At any time, you may request information about the source of your data and/or request its erasure (where possible) by writing to the contact details provided in the section *“How you can control your data and your choices”*.

If you find yourself in this situation (and have therefore provided us with Third-Party Data), we recommend that you carefully read the section titled *“Third-Party Data”* in the section *“What data do we collect and process”*.

What is not covered by this policy

This Policy explains and covers the processing operations we carry out as **the Data Controller**. The illustrated icons are licensed under a [open licence](#) or [CC BY 4.0](#) by the University of Maastricht’s European Centre on Privacy and Cybersecurity (ECPC).

This Policy does not cover processing carried out by Virgin in the context of its relationship with employees and/or contractors in general, nor does it cover processing carried out within our Academy or by parties other than Virgin; in particular, it does not cover processing carried out by our **business partners** acting as independent **Data Controllers**, including that carried out by social media platforms within our **Pages** and **Apps**. In this regard, we accept no liability for the processing of your data not covered by this Policy.

Changes to the Policy

This Policy comes into effect on the date indicated at the beginning of the document. We reserve the right to amend or update this Policy, in whole or in part, at our discretion or as a result of changes in applicable regulations. We will inform you of any substantial changes via your contact details.

Definitions

Other tracking technologies: pixel tags (trackers used with cookies and embedded in web page images to track certain activities, such as viewing Content that may be of interest to you, or to see if an email has been read) or unique identifiers embedded in links to promotional communications that send us information when clicked.

Apps: refers collectively to the *“Virgin Active Italia”* and *“Virgin Active Revolution”* mobile applications available in app stores in Italy (e.g. the Apple Store and Google Play), as well as via applications for mobile devices and smart TVs, which allow you to access Virgin’s digital workouts via live streaming and on-demand.

Authority: refers to a government, whether supranational, federal, state or local, a statutory, administrative or regulatory body, a court, an agency (including law enforcement), or any other authority anywhere in the world (including outside your jurisdiction) whose regulations, directives, notices, resolutions, orders, decrees, injunctions, warrants, summonses or judgements are binding on us and require us to disclose your Personal Data. We will not share your data without your consent, unless we are legally obliged to comply with such regulations.

Browser: refers to the programmes used to access the Internet (e.g. Safari, Chrome, Firefox, etc.).

Clubs: these include our fitness centres in Italy, an up-to-date list of which is available in the *“Clubs”* section of our website at: <https://virginactive.it/club>.

Combining and/or cross-referencing: this refers to the set of fully automated and non-automated operations we have used to create inferred data about you. We may also combine and/or cross-reference information from different sources.

Content that may be of interest to you: for example, if you search for a specific Service, we may display similar Services on our Pages or via programmatic advertising. Content personalisation may be achieved through the combination and/or cross-referencing of data.

Cookies: a cookie is a small text file that is downloaded to your Device (e.g. smartphone, computer) when you access our Pages. It allows websites to recognise your Device and store information about your preferences or past actions (e.g. the fact that you have visited our Pages, your language and other information). The information collected via cookies may relate to you, your preferences or your Device and is primarily used to ensure our Pages function as you would expect. The information collected via cookies does not usually identify you directly, but it can offer you a more personalised experience on the Pages you are visiting, as it may be used to record your preferences regarding the use of cookies (technical cookies), analyse and improve our Services, and create new services and features or personalise our Services, including Content that may be of interest to you. Further information on Cookies is, however, available in the following section of our website: <https://virginactive.it/cookie-policy>.

Aggregated data: refers to statistical information about you that does not contain your Personal Data. We use this information to analyse and improve our Services, create new services and features, and generate statistical reports for our business partners.

Personal Data: this refers to any information relating to an identified or identifiable natural person, directly or indirectly, as well as any information linked or reasonably linkable to a particular individual or household. For example, an email address (if it relates to one or more aspects of a person), IP addresses and unique identifiers are considered Personal Data.

Sensitive data: this refers to Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and the processing of genetic data, biometric data intended to uniquely identify a natural person, data concerning health, or data concerning a natural person’s sex life or sexual orientation. In particular, in order for you to train at the

Clubs, you must provide a medical certificate of fitness for fitness and wellness activities (in this regard, please note that you may use the medical appointment booking services available at our Clubs, and in this context, the doctors act as independent data controllers); furthermore, as part of the management of your membership (for example, if you request to suspend your membership), Virgin may become aware of information relating to your state of health, as well as information that may be collected during training sessions (for example, you may provide information regarding medical conditions that affect the exercises you can perform).

Device: refers to the electronic device (e.g. iPhone) you use to visit our Websites or Apps.

Events: refer to any event or webinar organised or managed by us as the Data Controller.

Service providers: this refers to entities that we engage to process your Personal Data exclusively on our behalf and in accordance with written instructions provided by us, or to external parties (contractors) to whom we delegate certain processing activities. For example, security system providers, accounting, administrative, legal, tax, financial and debt collection advisers, data hosting platform providers, body measurement providers, etc. You may request disclosure of the service providers processing your Personal Data by contacting us via the contact details provided in this policy.

For the purposes of this policy, the definition of “Service Providers” includes the processing of Personal Data of the contact persons (i.e., natural persons) of such entities who, by virtue of the contractual relationship, process Personal Data on behalf of Virgin.

Unique Identifiers: these consist of information that can uniquely identify you through your Browser and your Device. On the Browser, the IP address and Cookies are considered unique identifiers. On your Device, advertising identifiers provided by manufacturers, such as Apple’s IDFA and Android’s AAG, which we use to analyse and improve our Services and to create new services and features, including Content that may be of interest to you, are considered Unique Identifiers. Please note that for these purposes and in line with the opinions of the European and Italian Supervisory Authorities, we do not use other Unique Identifiers such as MAC addresses and IMEIs, as these cannot be reset by you.

IP address: this is a unique number used by your browser or device to connect to the internet. Your internet service provider assigns this number, which allows us to identify the provider and/or the approximate area where you are located. Without this data, you cannot connect to the internet or use our Services or the Content that may be of use to you.

Forms: any form through which we may collect your data directly (e.g. account registration, guest pass, visitors’ book, etc.)

Pages: includes our website (<https://www.virginactive.it>) and our social media pages.

Business partners: these are third-party entities that provide us with your Personal Data only after having contractually assured us that they have obtained your consent or have another legal basis that legitimises their disclosure/sharing of such data with us. This definition also includes selected partners with whom we may share i) aggregated data for business intelligence or partnership purposes or ii) where necessary, a minimal set of your Personal Data based on your request (for example, to provide you with rewards under our loyalty programme). You may request disclosure of the Business Partners who process your Personal Data by contacting us via the contact channels set out in this policy. Where applicable, for the purposes of this Policy, the definition of “Business Partners” includes the representatives (i.e., natural persons) of such third parties (i.e., legal entities) with whom Virgin has a contractual relationship. We would, however, like to reassure you that any promotional communications you receive regarding the activities and/or services of our Business Partners are sent by Virgin and, therefore, without any disclosure of Personal Data held by Virgin Active to the aforementioned Partners.

Staff: our employees and contractors (including Personal Trainers acting as authorised processors of your Personal Data) who have undertaken a duty of confidentiality and adhere to specific rules regarding the processing of your Personal Data. With particular reference to our Personal Trainers (PT) and/or Gym Trainers (GT), we would like to clarify that, should you decide to train with a PT/GT, they will, on the one hand, have access to the Personal Data you have previously provided to us (such as the training data contained in the App and your contact details) and, on the other hand, will process the Personal Data you provide to them during the training session, it being understood that, in both cases, the Personal Trainer/Gym Trainer will process your Personal Data in accordance with the specific instructions provided by Virgin, which remains, even in these cases, the sole Data Controller of your Personal Data. Furthermore, should you use the *Personal Training/Gym Training* service, Virgin (as the Data Controller) is informed of this by the staff member, and this information is necessary for organisational purposes and for the management of work and facilities, as well as to enable the management of your training sessions with the Personal Trainer/Gym Trainer. Your name, within our IT systems, will therefore be linked to that of your Personal Trainer/Gym Trainer, and vice versa, and without such a link, the *Personal Training/Gym Training* service cannot be provided. This category also includes system administrators (either our own or those of our service providers) who assist us in managing our IT systems and who, therefore, may access, modify, suspend and restrict the processing of your Personal Data. These individuals have been carefully selected and adequately trained, and their activities are monitored by systems that they cannot alter.

Programmatic advertising: these are platforms that share information collected about you, such as your IP address and data collected via cookies, SDKs and other tracking technologies, with entities interested in showing you Content that may be of use to you. In our case, if you view a particular product on our Pages, we will ask Programmatic Advertising participants to provide us with an advertising space on one of the websites you visit, in order to display Content that may be useful to you. In this regard, we wish to reiterate that the disclosure of your Personal Data to Programmatic Advertising participants is based on your prior and specific consent provided via the banner when you first visit our Pages. If you wish to know how you can object to such disclosures, please follow the instructions in the section “*How you can control your data and manage your choices*” above.

SDKs: these are software libraries that are installed alongside a mobile application. They enable data collection in the same way as Cookies do on a browser. Depending on your Device settings, SDKs may collect information about your location, unique identifiers and Personal Data derived from your activity.

Services: collectively, this refers to all services/activities/products available and accessible via our Pages, the App and our Clubs.

This therefore includes all those created and offered by Virgin and relating to the subscription contract (taken out either at our Clubs or via online channels) and/or, more generally, to courses, programmes, training sessions (including outdoor sessions where organised) connected in any way to wellbeing and fitness, as well as those relating to Virgin Active Revolution and padel courts for members and non-members (where available). The Services also include contact from us to improve the Services you have already purchased (for example, we will contact you to ensure that you have correctly activated your membership and collect any initial feedback from you regarding your experience within the Clubs) and/or to remind you of what is included in your membership (for example, if you have not used the Services you have purchased, we will take steps to understand the reasons and help you find alternative solutions).

Data Controller or Joint Controller(s): refers to the legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of your Personal Data. In other cases, the term may be followed by the word “independent” (for example, “Independent Data Controller”) to indicate that your Personal Data is processed by a party other than us. In your case, the Data Controller is Virgin Active Italia S.p.A., Tax Code and VAT No. 03641880962, with its registered office at Corso Como 15, 20154 Milan.

(Last update: 15.04.2026)