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## **New Stadium Designated Activity Company**

### **PRIVACY POLICY**

#### **1. Introduction**

1.1 This is the Privacy Policy of New Stadium Designated Activity Company (t/a Aviva Stadium), which is referred to as "**New Stadium DAC**", "**us**" or "**we**" throughout this Privacy Policy. This Privacy Policy provides details of the way in which we Process Personal Data when managing and operating the Aviva Stadium (the "**Stadium**") in compliance with our obligations under Data Protection Law.

1.2 Capitalised terms used in this Privacy Policy are defined in the Glossary in Annex I.

#### **2. Background and Purpose**

2.1 The purpose of this Privacy Policy is to explain what Personal Data we Process and how and why we Process it. In addition, this Privacy Policy outlines our duties and responsibilities regarding the protection of such Personal Data. The manner in which we Process data will evolve over time and we will update this Policy from time to time to reflect changing practices.

2.2 If you are a staff member (including contract and temporary staff member) of New Stadium DAC, please see our Employee Data Protection Notice.

2.3 In addition, in order to meet our transparency obligations under Data Protection Law, we will incorporate this Privacy Policy by reference into various points of data capture used by us (e.g. application forms etc.).

#### **3. New Stadium DAC as a Data Controller**

3.1 New Stadium DAC will act as a Data Controller in respect of Personal Data provided to us by various individuals in connection with the operation and administration of New Stadium DAC, in particular when managing and operating the Stadium. Such individuals will generally include the following:

- all visitors to the Stadium (including stadium tour visitors);
- other match day personnel (e.g. medical staff and stewards);
- officials from organisations such as the IRFU, the FAI, concert promoters and other organisations (including visiting officials);
- business contacts of New Stadium DAC; and
- members of the public who make telephone calls to or otherwise engage with the Stadium or New Stadium DAC.

3.2 Personal Data is processed by New Stadium DAC for the following purposes:

Purpose of Processing	Categories of Personal Data	Lawful Basis under GDPR
<p>Processing of visitor details, including tour visitors to allow New Stadium DAC to act as a stadium venue and to provide its business services.</p>	<ul style="list-style-type: none"> <li>Identifiers such as your name, email address and phone number;</li> <li>affiliated organisation, if any; and</li> <li>health information where relevant e.g., to assist with the provision of assistance in the event of a medical emergency.</li> </ul>	<p>Such processing is necessary: (a) for the performance of a contract between New Stadium DAC and its stadium tour visitors pursuant to Article 6(1)(b) GDPR; and (b) for the legitimate interests pursued by New Stadium pursuant to Article 6(1)(f) GDPR in managing and controlling visitor access to the stadium. With respect to health information, such processing is necessary to protect the vital interests of data subjects under Article 6(1)(d) GDPR and Article 9(2)(c) GDPR. The processing of health data may also occur on the basis of consent under Article 6(1)(a) and Article 9(2)(a) GDPR.</p>
<p>Processing for the purpose of access control to the stadium, including access control cards.</p>	<ul style="list-style-type: none"> <li>Identifiers such as your name, title, contact details and photographic ID.</li> </ul>	<p>Such processing is necessary for: (a) for the performance of a contract between New Stadium DAC (or another entity) and the data subject pursuant to Article 6(1)(b) GDPR in accordance with the Stadium Ground Rules (Regulations); and (b) the legitimate interests pursued by New Stadium DAC pursuant to Article 6(1)(f) GDPR in managing and monitoring access to the stadium.</p>
<p>Processing of CCTV footage for security purposes.</p>	<ul style="list-style-type: none"> <li>Images and video of you.</li> </ul>	<p>Such processing is necessary for the legitimate interests pursued by New Stadium DAC pursuant to Article 6(1)(f) GDPR to protect</p>

Purpose of Processing	Categories of Personal Data	Lawful Basis under GDPR
		staff and visitors to the stadium and New Stadium DAC property. Such processing is necessary to protect the vital interests of data subjects under Article 6(1)(d) GDPR. See Section 8 of this Privacy Policy for further details in relation to this processing.
Processing of call recordings for security purposes.	<ul style="list-style-type: none"> <li>• Recordings of your voice; and</li> <li>• any personal data you disclose on the call.</li> </ul>	Such processing is necessary for the legitimate interests pursued by New Stadium DAC pursuant to Article 6(1)(f) GDPR to protect staff and visitors to the stadium and New Stadium DAC property. Such processing may be necessary to protect the vital interests of data subjects under Article 6(1)(d) GDPR. See Section 10 of this Privacy Policy for further details in relation to this processing.
Processing of personal data of officials from organisations such as the IRFU and FAI (and visiting officials from other organisations).	<ul style="list-style-type: none"> <li>• Identifiers such as your name, email address and phone number;</li> <li>• affiliated organisation;</li> <li>• family circumstances (e.g. marital status if your spouse is invited to an event); and</li> <li>• health information where relevant e.g., to assist with the</li> </ul>	Such processing is necessary for the legitimate interests pursued by New Stadium DAC pursuant to Article 6(1)(f) GDPR to arrange, control and facilitate officials' access to the stadium. With respect to health information, such processing is necessary to protect the vital interests of data subjects under Article 6(1)(d) GDPR and Article 9(2)(c) GDPR. The processing of health data may also occur on the basis of consent under Article

Purpose of Processing	Categories of Personal Data	Lawful Basis under GDPR
	provision of assistance in the event of a medical emergency.	6(1)(a) and Article 9(2)(a) GDPR.
Processing of personal data of match day personnel such as security, medical personnel and event stewards.	<ul style="list-style-type: none"> <li>• Identifiers such as your name, role, email address and phone number;</li> <li>• affiliated organisation;</li> <li>• health information where relevant e.g., to assist with the provision of assistance in the event of a medical emergency; and</li> <li>• PPS number, bank details, event pay etc., as relevant.</li> </ul>	Such processing is necessary for the performance of a contract between New Stadium DAC and match day personnel pursuant to Article 6(1)(b) GDPR. With respect to health information, such processing is necessary to protect the vital interests of data subjects under Article 6(1)(d) GDPR and Article 9(2)(c) GDPR. The processing of health data may also occur on the basis of consent under Article 6(1)(a) and Article 9(2)(a) GDPR.
Processing of personal data of contractual service providers such as catering and merchandise services.	<ul style="list-style-type: none"> <li>• Identifiers such as your name, role, email address and phone number;</li> <li>• affiliated organisation; and</li> <li>• health information where relevant e.g., to assist with the provision of assistance in the event of a medical emergency.</li> </ul>	Such processing is necessary for the performance of a contract between New Stadium DAC and service providers pursuant to Article 6(1)(b) GDPR. With respect to health information, such processing is necessary to protect the vital interests of data subjects under Article 6(1)(d) GDPR and Article 9(2)(c) GDPR. The processing of health data may also occur on the basis of consent under Article 6(1)(a) and Article 9(2)(a) GDPR.
Processing of business contacts of New Stadium DAC.	<ul style="list-style-type: none"> <li>• Identifiers such as your name,</li> </ul>	Such processing is necessary for the legitimate interests of New

Purpose of Processing	Categories of Personal Data	Lawful Basis under GDPR
	title and contact details; and <ul style="list-style-type: none"> <li>• affiliated organisation.</li> </ul>	Stadium DAC pursuant to Article 6(1)(f) GDPR to enter into business arrangements with third parties to facilitate the functioning of New Stadium DAC's business.
General correspondence with members of the public (by post or various New Stadium DAC email addresses) for example where an individual sends correspondence to inquire about meetings and venue hire or for other reasons.	<ul style="list-style-type: none"> <li>• Identifiers such as your name and email address; and</li> <li>• any personal data you choose to disclose in such correspondence.</li> </ul>	Such processing is necessary for the particular purpose for which the correspondence is sent to New Stadium DAC. Depending on the particular context of such correspondence the relevant lawful basis may be: (a) the individual's consent (Article 6(1)(a) GDPR) (such consent may be withdrawn at any time without affecting the lawfulness of processing based on consent before its withdrawal); (b) to take preparatory steps prior to entering into a contract (Article 6(1)(b) GDPR); or (c) New Stadium DAC's legitimate interests (for example, responding to queries from the public) (Article 6(1)(f) GDPR) to facilitate New Stadium DAC's engagement with and response to queries from members of the public who attend or may attend the stadium.
Processing of personal data for website purposes such as technical information, information about your website visit and cookies.	<ul style="list-style-type: none"> <li>• Internet Protocol (IP) addresses; and</li> <li>• impression events like page or product views</li> </ul>	Such processing is necessary for the legitimate interests pursued by New Stadium DAC including for troubleshooting, data analysis, testing, research, statistical and survey

Purpose of Processing	Categories of Personal Data	Lawful Basis under GDPR
		purposes pursuant to Article 6(1)(f) GDPR.

#### 4. **New Stadium DAC and Data Processors**

- 4.1 New Stadium DAC will engage certain service providers to perform certain services on its behalf which may involve the Processing of Personal Data. To the extent that such Processing is undertaken based on the instructions of New Stadium DAC and gives rise to a Data Controller and Data Processor relationship, New Stadium DAC will ensure that such relationship is governed by a contract which includes the data protection provisions prescribed by Data Protection Law.
- 4.2 New Stadium DAC will also act as a Data Processor in certain situations when Processing Personal Data for and on behalf of third parties such as the Irish Rugby Football Union and the Football Association of Ireland. Where the New Stadium DAC acts a Data Processor, we will ensure that such relationship is governed by a contract which includes the data protection provisions prescribed by Data Protection Law.

#### 5. **Individual Data Subject Rights**

- 5.1 Data Protection Law provide certain rights in favour of data subjects. The rights in question are as follows (the "**Data Subject Rights**"):
  - (a) The right of a data subject to receive detailed information on the processing (i.e., the information provided in this Privacy Policy);
  - (b) The right of access to Personal Data;
  - (c) The right to rectify or erase Personal Data (right to be forgotten);
  - (d) The right to restrict Processing;
  - (e) The right of data portability;
  - (f) The right not to be subject to certain automated decision making, including profiling;
  - (g) The right to object to any processing undertaken by New Stadium DAC based on legitimate interests;
  - (h) The right to withdraw consent to processing based on consent without affecting the lawfulness of processing that occurred prior to the withdrawal of consent; and
  - (i) The right to complain to the Data Protection Commission.
- 5.2 These Data Subject Rights will be exercisable by you subject to limitations as provided for under law. You may make a request to New Stadium DAC to exercise any of the Data

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Subject Rights by contacting Company management at [info@avivastadium.ie](mailto:info@avivastadium.ie). Your request will be dealt with in accordance with law.

6. **CCTV on New Stadium DAC Premises**

The Stadium is a public place and to ensure the security and safety of visitors and staff, New Stadium DAC uses closed circuit television cameras (“**CCTV**”) located throughout its premises covering buildings, internal spaces, car parks, roads, pathways and grounds. New Stadium DAC’s CCTV system is implemented in a proportionate manner as necessary for the legitimate interest of the safety and security of staff and visitors, including tour visitors to the New Stadium DAC premises (and to protect their vital interests) and to protect New Stadium DAC property against theft or pilferage.

Whilst CCTV footage is monitored by New Stadium DAC security staff, access to recorded footage is strictly limited to authorised personnel. Footage is retained for no more than 15 days, except where incidents or accidents have been identified in which case such footage is retained for as long as necessary in the context of that issue. CCTV footage is not disclosed to third parties except where disclosure is required by law or on behalf of an individual captured in the footage (such as for the purpose of preventing, detecting or investigating alleged offences) and in such instances disclosure is based on a valid request. Signage indicating that CCTV is in use is displayed prominently throughout the New Stadium DAC premises, including the stadium, the stadium management building and the stadium underground car park.

For information on CCTV operations at the Stadium and New Stadium DAC, please contact [info@avivastadium.ie](mailto:info@avivastadium.ie).

7. **Photographs and Recordings**

New Stadium DAC hosts national and international sporting fixtures and other events. These events are of public and media interest and therefore are subject to audio and visual recording and photography. When attending the Stadium, which is a public place, there is a reasonable expectation that staff and Stadium visitors may be photographed and recorded in video footage and that these images and recordings may be published by us for promotional purposes and third parties including media outlets and broadcasters. Such processing is undertaken in New Stadium DAC’s legitimate interests and those of media outlets and broadcasters. By attending the Stadium for such events, you acknowledge that the Stadium is a public place and that you may have a reduced expectation of privacy. While you have a right to object to your inclusion in any photographs or video footage, any such objection must be balanced against the legitimate interests pursued by New Stadium DAC and/or third party media outlets and broadcasters.

8. **Call Recording**

The security and safety of visitors and staff at the Stadium is of paramount importance to the owner, New Stadium DAC, the board of directors and management. The Stadium is a high profile public venue that may be subject to security threats and incidents which could endanger the safety and wellbeing of New Stadium DAC staff and visitors to the Aviva Stadium. Call recording is in the legitimate interest of ensuring the security of staff, visitors to the Stadium and members of the general public, including to protect their vital interests, and to protect New Stadium DAC property against potential security threats.

While calls on workplace telephone lines of the Stadium and New Stadium DAC may be recorded, New Stadium DAC will ensure that access to call recordings by staff is strictly limited to authorised

personnel. Call recordings are retained for a limited period of time, except where a security incident or threat requires the retention of a call recording for investigative purposes, including investigations by law enforcement authorities. Callers to the Stadium will be informed that calls are recorded for security purposes.

**9. Disclosing Personal Data**

From time to time, we may disclose Personal Data to third parties, or allow third parties to access Personal Data which we Process such as the categories of Personal Data described in Section 3.2 above. For example where a law enforcement agency or regulatory authority submits a valid request to us, we may disclose Personal Data to them. We may also disclose Personal Data to other competent authorities where required to do so and to professional advisors and third parties that provide services to us (such as IT service providers, hosting providers, IT supporting providers, consultants, lawyers, accountants, insurance brokers). We may also disclose Personal Data to other organisations connected to us such as the IRFU and the FAI.

**10. Data Retention**

We will keep Personal Data only for as long as the retention of such Personal Data is deemed necessary for the purposes for which that Personal Data are Processed (as described in this Privacy Policy) or as required for legal or regulatory purposes.

**11. Data Transfers outside the EEA**

From time to time, New Stadium DAC may transfer Personal Data to countries outside the EEA which may not have the same or equivalent Data Protection Law as Ireland. If such transfer occurs, New Stadium DAC will ensure that such Processing of your Personal Data is in compliance with Data Protection Law and, in particular, that appropriate measures are in place such as entering into Standard Contractual Clauses (as published by the European Commission) or ensuring that the recipient is certified under the Data Privacy Framework, if appropriate. If you require more information on the means of transfer of your data or would like a copy of the relevant safeguards, please contact: [info@avivastadium.ie](mailto:info@avivastadium.ie).

**12. Further Information/Complaints Procedure**

For further information about this Privacy Policy and/or the Processing of your Personal Data by or on behalf of New Stadium DAC please contact: [info@avivastadium.ie](mailto:info@avivastadium.ie). While you may make a complaint in respect of our compliance with Data Protection Law to the Irish Data Protection Commission, we request that you contact us in the first instance to give us the opportunity to address any concerns that you may have.

**Date: January 2026**

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## ANNEX I

### Glossary

In this Privacy Policy, the terms below have the following meaning:

**"Data Breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed.

**"Data Controller"** means the entity which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

**"Data Processor"** means the party that Processes Personal Data on behalf of the Data Controller.

**"Data Protection Law"** means the General Data Protection Regulation (No 2016/679) ("**GDPR**") and the Data Protection Act 2018 and any other laws which apply to New Stadium DAC in relation to the Processing of Personal Data.

**"European Economic Area"** or "**EEA**" means Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the UK, Iceland, Liechtenstein, and Norway.

**"Personal Data"** is any information relating to a living individual which allows the identification of that individual. Personal Data can include:

- a name, an identification number;
- details about an individual's location; or
- any other information that is specific to that individual.

**"Processing"** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. "**Process**" and "**Processing**" are interpreted accordingly.

## ANNEX II

### Types of Personal Data

Categories of Data Subject	Type of Personal Data
Event day attendees	Ticket details which may include first and last name and / or affiliated organisation
Members of the public who make calls to the Stadium or New Stadium DAC	Personal data revealed by a member of the public during a call.
Stadium tour attendees	Booking details may request certain personal data such as first and last name and / or affiliated organisation
Event Stewards	Payroll data including name, contact details, PPS number, event pay, bank details etc.
Officials from organisations such as the IRFU and FAI (and visiting officials)	Name, title, organisation details, contact details
Business contacts of New Stadium DAC	Name, title, organisation details, contact details
Match day personnel (including medical staff)	Name, title, organisation details, contact details
Stadium Access Control	Stadium accreditation will require name, title, contact details and will also require photographic ID which is stored securely and for the sole purpose of stadium access control.