

INTERNATIONAL RUGBY EXPERIENCE PRIVACY POLICY

This Privacy Policy explains what personal information Rugby World Experience Company Limited by Guarantee (“we”, “us” or “our”) collect, use, share when you visit or contact us at our premises or by our website (the “Website”), including any data you may provide through the Website or otherwise e.g. when you sign up to our newsletter, purchase a product or service or ticket or take part in a competition requiring the submission of data.

Please be aware, the Website is not intended for children, and we do not deal directly with children. Children at our premises must be represented and supervised at all times by an adult.

We keep our privacy policy under regular review, and we will make changes to this notice from time to time, particularly when we change how we use your information or our technology and products. This version was last updated on 7 March 2023. You can always find an up-to-date version of our Privacy Policy on our Website.

1. WHO WE ARE AND HOW TO CONTACT US

Rugby World Experience Company Limited by Guarantee (trading as International Rugby Experience) is a company registered in Ireland under company number 593873 and has its registered office in Ireland at Avonlea, Demesne, Lucan, Co. Dublin. Our principal place of operation is at 40 O’Connell Street, Limerick, V94 8F78.

For the purpose of the General Data Protection Regulation 2016/679 as it may be amended or varied from time to time (“**GDPR**”), we act as data controller in respect of personal data processed via the Website and through other contact with us.

Any data protection related queries can be sent to: bhannon@internationalrugbyexperience.com

If you have a complaint about the use of your personal information, please contact: bhannon@internationalrugbyexperience.com. You can also contact the Data Protection Commissioner in Ireland at www.dataprotection.ie.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes, for example, first name, maiden name, last name, username, position, or similar identifier.
 - Contact Data includes, for example, billing address, delivery address, email address and telephone numbers.
 - Financial Data includes bank account and payment card details.
 - Transaction Data includes, for example, details about payments to and from you and other details of products and services you have purchased from us or otherwise used.
 - Technical Data includes, for example, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.
 - Usage Data includes, for example, information about how you use our website, products and/or services.
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- Marketing and Communications Data includes your preferences in receiving marketing from us and, as applicable, our third parties and your communication preferences.
- Security Data including, for example, CCTV footage.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with tickets or other goods and/or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise and through the ticket purchasing process online and/or in person. We may also collect Transaction Data through the Website or while you are on our premises. We may collect Security Data while you are on our premises.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy [[Privacy & Cookies Policy | International Rugby Experience](#)] for further details.
- Technical Data from analytic providers and search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

4. HOW WE USE YOUR PERSONAL DATA

We may use your information for the purposes described in this Privacy Policy, or as otherwise disclosed at the time of collection.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and on which of the legal bases set out in GDPR that we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing (including
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		basis of legitimate interest
<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees, and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) Sending e-tickets</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To enable you to complete a survey or partake in a prize draw or other competition (e.g., sending interactive results and/or featuring on our leader board)</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Performance of a contract with you</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, network security)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>For health & safety and/or security purposes</p>	<p>(a) Security</p>	<p>Necessary for our legitimate interests (to ensure health and safety of staff, protect security and establish or defend legal claims)</p>

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

Sometimes, we may share your personal data with third parties for example to manage our ticket service, collect debts, provide and maintain our Website and to maintain our IT system and services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our

instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. We will securely delete your personal information when it is no longer required.

In some circumstances you can ask us to delete your data: see *Your Legal Rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Right to request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - Right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - Right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 - Right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
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- Right to request restriction of processing your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful, but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- Right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at: [bhannon@internationalrugbyexperience.com].

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Dated 7 March 2023.
