Data Protection Notice - RWC25 Tournament e-Learning Platform

This Data Protection Notice provides users, visitors and individuals with details on the personal data collected and processed in connection with the services and functionalities provided to individuals when using or engaging with the RWC25 Tournament e-Learning Platform.

The RWC25 Tournament e-Learning Platform has been developed and made available to users to provide access to necessary and required online e-learning modules and training courses and resources for staff, volunteers and other individuals involved in supporting or working on the Rugby World Cup England 2025 tournament (**RWC25**).

The platform is made available via the following link – https://eventtraining.rugby/login/index.php - (such URL may be updated or expanded from time to time) and includes all pages, functionalities, channels and/or platforms that are made available within or in connection with the platform (collectively, the "Platform").

Data Controller

The following two entities will be joint controllers for the processing activities related to the Platform for RWC25. Where terms such as 'we', and 'our' are used they shall be understood to refer to both entities simultaneously. The authorised purposes are outlined further below.

- World Rugby, including in particular, World Rugby Events DAC, with registered offices at 8-10 Pembroke Street Lower, Dublin, Ireland, which is the owner of the commercial rights to RWC25, and other World Rugby group companies as outlined further below in this Privacy Statement (collectively, "World Rugby");
- Rugby World Cup (England 2025) Limited, the local operating company which has been authorised by World Rugby Events DAC to organise and operate RWC25, with registered offices at Onside Law LLP, 642a Kings Road, London, England ("LOC25").

As joint controllers, LOC25 and World Rugby have decided together why and how your personal data will be processed to facilitate the administration and management of the Platform and e-learning/training requirements for RWC25. When organisations act as joint controllers, they must be transparent on the roles and responsibilities of each entity involved.

World Rugby will process your personal information to facilitate the registration function which enables you to register for and create a Platform account. It will be necessary to have registered for and use your Platform account to access and use the Platform, including initial registration, monitoring your registration process and accessing the details of your Platform account and learning and training progress. World Rugby will also process your personal information for the purposes of ensuring the proper functioning of the Platform for your use for RWC25.

LOC25 will be processing your personal information in order to facilitate and manage your participation in training and e-learning courses via the Platform, and the ensuing day to day management of the Platform insofar as it relates to your Platform account and your e-learning and training requirements. This will include issuing your Platform invite, reviewing your registration and any responses, answering general queries, accommodating accessibility requirements, and providing you with operational and service information and support regarding your Platform use and training and e-learning requirements, all with the objective of ensuring you are able to perform your role at RWC25.

Where one of these entities processes your personal information for any other purpose, other than that which was jointly agreed, that entity will be considered to be a separate or independent data controller. More information on how World Rugby processes personal information and how you can assert your data protection rights to World Rugby as an independent controller can be found in the <u>World Rugby Privacy Statement</u>. The LOC25 will process your personal information collected for the purposes of the training and learning via the Platform only for the reasons outlined in this notice in relation to the administration and operation of the Platform.

Your data protection rights are not impacted by the existence of this joint controller relationship. You can submit a request regarding your personal information to either of the entities and both entities will work together to satisfy your request. Please see further below in the "Contact Details" section of this Privacy Statement for details on how you can contact each of these entities in relation to your data protection rights.

Application of this Data Protection Notice

This notice is addressed and relevant to individuals who visit, interact, browse and/or use the Platform, create and/or register for an account to access and use the Platform, complete or participate in e-learning and training modules and courses via the Platform or submit any information via or in connection with the Platform (or any services offered via the Platform). This will include the following users who are participating in and/or supporting RWC25:

- RWC25 Volunteers
- World Rugby staff and LOC25 staff
- RWC25 appointed contractors and suppliers

This notice also applies to any individuals (and their personal data) who have already created or registered for a profile account within the RWC25 Tournament Management System (TMS) and whose personal data has been shared from the TMS with this Platform as part of the management and administration of their RWC25 roles.

This notice may also be supplemented with additional information, about the processing of your personal information, which may be made available to you for any particular or additional functionality, application or service you might avail of via or in connection with the Platform. You are encouraged to read any such additional information that may be presented or made available to you.

Purpose of this Data Protection Notice

This notice will provide you with information regarding how your personal data is collected, used, processed and retained by us via the Platform.

More specifically, the purpose of this notice is to provide you with a clear understanding of:

- Who is collecting and processing your personal data;
- The types and categories of your personal data that we collect;
- Why we collect your personal data and where we collect it from;
- How and why we use your personal data;
- Who we may share or disclose your personal data with and why;
- How we protect your data protection rights;
- How you can obtain further information on our use of your personal data;
- Other details relevant to how we give effect to the privacy of individuals.

What Information Do We Collect?

Registration Data

We collect and process the following data about Platform users in order to enable users of the Platform to have their Platform accounts created and registered so they can access and use the Platform:

- Username
- First name
- Last name
- Email Address
- Password
- RWC25 role / group

Please note that, where users have already created or registered for a profile account within the RWC25 Tournament Management System (TMS), in accordance with the policies of the TMS, certain personal data of such users, (namely: email, first name, surname, username) will be shared from the TMS directly to the Platform via secure transfer for the purposes of initial Platform account set-up. Users will be required to log in to their Platform accounts by inputting their email address and creating and/or inputting a password.

Usage, Course and Learning Data

As the Platform provides users with access to online training courses, e-learning and modules and provides users with information on and access to content, courses and learning assessments, the following information about users will also be processed when using the Platform or taking modules/courses:

- Names (First Name, Last Name), email addresses, assigned content/learning modules, module/course usage, participation and completion data;
- Your Platform account information will be processed to identify which training courses and e-learning
 modules you are to be enrolled in which will be relevant to the specific role you have been assigned or
 selected for RWC25. You will also be issued with enrolment requests, confirmations of successful enrolments
 and notifications of course/learning completions;
- When users participate in any online courses, trainings or modules provided on the Platform, a record that
 they took part in and/or completed that online course (including the course name and date(s) of attendance
 and any course certifications) (i.e. user learning history);
- Details of any assessments which users sit (whether online or in person), assessment transcripts and the results or certifications achieved in such assessments;
- We will use your Platform account data and activity data to track and report upon your learning and course completion progress insofar as it relates to your e-learning and training requirements for your role at RWC25;
- Details and records of any courses or modules taken or completed by you;
- If applicable only details of user attendance in person at "offline" face-to-face training courses and events

 user attendance at such courses and events will be logged by way of an electronic or manual sign-in at the relevant course or event and may subsequently be uploaded to the Platform;
- Logging of your interactions with the Platform in accordance with good logging, monitoring and auditing practices for systems of this nature in the interests of assuring the security of the system and the access and privilege controls and restrictions that are in place;
- Logging and recording any data which you have submitted to the Platform, and when this was submitted, so
 that this can be checked and verified in the event that any queries subsequently arise regarding the data you
 have submitted.

We will also your email address and Platform account information to send you confirmation or certification of course completions, training or module attendance and/or completions and to provide you with details of up-coming courses, trainings or modules available or required to be completed via the services offered on the Platform.

Posted Content

We may use your posted content data, when you provide such data to us or submit it directly into the Platform via the interactive or community areas (if such areas are made available), for the purposes of enabling and facilitating discussion of ideas and the public sharing of content in interactive or community areas within the Platform and for ensuring that users of the interactive and community areas of the Platform comply with the Platform Terms and Conditions of Use applicable to such areas.

Please note that interactive or community areas (e.g. discussion forums, user comments, etc) may or may not be made available via the Platform, but where such public areas are made available, other Platform users may be able to see a) any feedback or comments that a user submits and b) personal details (including first name, last name) identifying the user who provided such feedback or submitted any such public comments within any such interactive or community areas.

Correspondence Data

Information about you will also be collected and processed when you contact us (e.g. by responding and/or keeping a record of that correspondence), for example, in connection with any aspect of your use of the Platform.

Other Functional and Usage Data

We may also collect information about your interaction with the Platform and the services on the Platform. This may include information about your computer and, where available, your IP address operating system and browser type, but only if and to the extent it is necessary and required for the specific purposes outlined in this notice.

Cookies

The Platform uses cookies. Cookies help us to ensure that the Platform can properly provide you with access to such services and functionalities that are made available via the Platform.

For detailed information on the Cookies that we use on the Platform and the reasons why we use Cookies, please refer to the **Platform Cookies Policy**.

Uses of Your Personal Data and Lawful Basis

The below table sets out the uses which we make of your personal data, and the lawful basis on which each use is grounded:

Category of Data	Uses	Lawful Basis
Registration Data	To register you on the Platform and enable safe, secure and effective authentication of your account each time you visit the Platform, and ensure that your access privileges are commensurate with your role in accessing the Platform in accordance with standard authentication, user management, access control, registration and security processes.	This is necessary in order for us to perform our contract with you regarding your registration for and access to the Platform and to align with the <u>Terms and Conditions of Use</u> for the Platform.
Usage, Course and Training Data	To keep a record of the e-learning modules and courses undertaken and completed by you in accordance with good learning practice and so as to ensure that you have completed all necessary or mandatory training or certifications required to enable you to perform your role at the RWC25 tournament, such training completion data to be shared back to your profile account within the RWC25 Tournament Management System (TMS).	This is necessary in our legitimate interests in supporting users to access, and receive and take part in, relevant elearning, content, materials and resources in respect of the game of rugby and to ensure you are completing appropriate training and learning to enable you to perform your assigned role at the RWC25 tournament.
Posted Content	We use content posted by you for the purposes of enabling and facilitating discussion of ideas and the sharing of content in the public interactive and community areas on the Platform and for ensuring that users of such areas comply with the Platform Terms and Conditions of Use (see link above in this Table).	This is necessary in order to provide the interactive and community areas to you pursuant to our Platforms Terms and Conditions of Use (see link above) to which users have agreed.
Correspondence Data	To enable us to respond to and address any queries, questions or other issues you raise with us.	This is necessary in our legitimate interests in addressing any queries, questions and concerns that you may have.
Other Functional and Usage Data	To monitor Platform usage and to ensure that any functional issues with the Platform are identified and remediated and that the Platform is working as efficiently and effectively as possible.	This is necessary in our legitimate interests in ensuring the Platform is run on an effective and secure basis and solving any functional issues encountered with respect to the Platform.
Cookies Data	Information collected via cookies	For cookies that don't require consent, it is in our legitimate interest to make available a service and platform that works and functions properly. For cookies that require consent, our lawful basis will be your consent to us using such cookies on the Platform - in accordance with our Cookies Policy.

Sharing Your Personal Data

We may share your personal data with certain third parties (processors) in connection with the above purposes and this notice as outlined below:

• With <u>Dynamic Business Services Limited</u>, our technology and software services provider who has developed and supports the software that runs the Platform, in connection with the functioning, administration and maintenance of the Platform and all data and functionality available on the Platform;

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- We may share your personal data with other technology and IT service providers in connection with the analysis, processing and storage of data referenced above in connection with the Platform;
- Personal data in the form of progress and completion reports data will be shared back to your account profile
 within the World Rugby Tournament Management System (TMS). The TMS will then hold information
 regarding whether courses and material have been completed, provide a status on which courses have been
 completed and which courses remain outstanding. The purpose of this is to enable us to validate that you
 have completed all necessary trainings and learnings to enable you to perform your assigned role at RWC25.
 Click here to access the RWC25 Volunteers and Staff TMS Privacy Policy;
- We may also share your personal data with third party service providers who we engage in connection with certain services relating to the Platform. These third parties are liable to change from time to time and their activities will be subjected to contractual obligations and necessary data protection measures and security requirements;
- Any posted content you provide via interactive or community areas will also be made available publicly to other users of such interactive or community areas within the Platform;
- We may share statistical information on learning and course participation levels with third parties. This is, however, done on a solely aggregated and anonymous basis so that no personal data of any users will be disclosed to such third parties for this purpose;
- We may share your personal information with other entities or associations within the World Rugby group of companies, who may support or provide services or enable certain of the processing activities outlined in this notice, including:
 - World Rugby;
 - World Rugby Tournaments Limited;
 - World Rugby local operating companies (established to operate and deliver World Rugby tournaments)
- We may need to share your personal data with a third party to provide a product or service that you have requested via or in connection with the Platform;
- We may also share personal data with third parties:
 - o when required by law or in response to legal process;
 - o in response to a request from law enforcement relating to a criminal investigation;
 - o to protect our rights, privacy, safety or property, or that of the public;
 - to analyse our data, conduct mobile analytics services or to maintain and improve our services (subject to confidentiality agreements as appropriate);
 - o to permit us to pursue available remedies or limit damage that we may sustain;
 - o if the rights or safety of another individual might be violated or in threat; and
 - where you otherwise consent to us doing so.

International transfers of personal data

In some of the circumstances described above, personal data may be transferred, accessible or visible to individuals and/or entities located outside of the EU or European Economic Area (EEA). This may include World Rugby companies which are located outside of the EU or the EEA. Countries outside the EU or EEA may not provide a level of legal protection for personal data as strong as the level of protection provided in the EU or EEA. Where we transfer your personal data to a recipient based outside the EU or EEA (or a recipient that does not have an appropriate level of protection), we will put in place a data transfer agreement with the overseas recipient of the information, protecting the information, in the appropriate standard form approved for this purpose by the European Commission (please contact us if you would like to see a copy of any of these agreements). The only exceptions are where we transfer information to member states of the European Economic Area or to countries outside the EEA or European Union

which have been determined to provide an adequate level of protection by the European Commission, or where the transfer is legally justified on another basis.

Automated Decision Making

Where you partake in an online assessment linked to any of the e-learning modules or courses, your personal data will be subject to automated decision making, as an automated process is used to determine whether your answers to the assessment questions are correct (by comparison against the designated correct answer). Where you answer all questions correctly, you will have your completion confirmed in respect of the relevant module or course. The purpose of this process is to ensure that module or course completion is only confirmed where a module or course (and assessment) has been successfully completed.

Marketing

Any of your personal data that is collected, processed or otherwise used via the Platform will not be used to undertake any activity for the purposes of direct marketing, within the meaning of data protection laws.

Marketing communications are different from us sending you necessary Platform-related service and operational emails and communications which we will need to do from time to time in order to successfully facilitate and improve your participation in the Platform.

Right to Withdraw Consent

If you have given us your consent to anything or any form of processing with your personal data, you have the right to withdraw your consent at any time. However, please note that this does not mean that anything we have done with your personal data with your consent up to that point is unlawful. This includes your right to withdraw consent (if you have provided such consent) to us using your personal data for marketing purposes.

If you have provided consent, you may withdraw your consent to receiving marketing communications by contacting us using the details below, or by availing of the unsubscribe option available to you in each communication.

Protection of Your Personal Information

We shall work to ensure that the personal information that you submit, we collect and/or that we process via the Platform shall be protected from the risks of unauthorised access or disclosure by putting in place appropriate technical and organisational security measures that ensure the necessary level of security, including in accordance with applicable data protection or data privacy laws.

How long do we keep your information?

The duration for which we retain your personal data will differ depending on the type of information, the reason why it was collected from you and your applicable status. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we take into account the following criteria and considerations:

- The amount, nature, and sensitivity of the personal data.
- The potential risk of harm from unauthorised use or disclosure of your personal data.
- The purposes for which we process your personal data and whether we can achieve those purposes through other means.
- Our contractual obligations and rights in relation to the personal data involved, and
- Applicable legal requirements (including prescribed retention periods and statutes of limitations).

Below are some examples of retention periods that we have in place in relation to the Platform:

Group/Individual	Retention Period
LOC25 Staff	6 months post RWC25 tournament or if opted in to retain for longer periods
RWC25 Volunteers	6 months post RWC25 tournament or if opted in to retain for longer periods
RWC25 Contractors	6 months post RWC25 tournament or if opted in to retain for longer periods
World Rugby Staff	3 years post tournament, or if opted in to retain for longer periods, until you have not interacted with the Platform for a period of 3 years (and in cases where the individual does not manage their own profile, the last updated date).

Subject access requests

As a data subject you will have the following rights in relation to the processing of your personal data. You can send us a request in relation to any of the rights outlined below, and we will do our best to adhere to your request as soon as possible and within one month.

Rights to access, correct, modify and/or remove your personal information

You have the following rights under applicable law, although your ability to exercise any of the above rights may be restricted or subject to specific conditions depending on certain circumstances:

- The right to receive a copy of and/or access, correct, and/or modify the personal data that we hold about you, together with other information about our processing of that personal data (i.e. you have a right to be informed about our processing of your personal data).
- The right to request that any inaccurate data that is held about you is corrected or rectified, or if we have incomplete information you may request that we update the information such that it is complete and accurate.
- The right to request that we erase your personal data or restrict the processing of your personal data.
- The right to request that we no longer process your personal data for particular purposes.
- The right to object to our use or processing of your personal data or the way in which we process it.
- The right to data portability.
- Right not to be subject to automated decision-making or profiling; You have a right not to be subject to a
 decision based solely on automated processing or profiling, where such decisions would have a legal effect
 or significant impact on you. Where we (or one of our third-party processors) use profiling, which produces
 legal effects for you or otherwise significantly affects you, you will have the right to object to such processing.

If any such individual has any questions about this notice, or regarding the Platform more generally, you can contact us at the contact details as set out below. To exercise your data protection rights, please use the contact details below.

Contact details

LOC25 has appointed a Data Protection Officer, Liam McKenna. If you have any queries in relation to this Privacy Statement, or if you would like to contact the <u>LOC25</u> in relation to your rights, please write to us at Data Protection Officer at 642a Kings Road, London, England, SW6 2DU. You can also contact our Data Protection Officer by emailing <u>DPO@england.rwc.rugby</u>.

If you have any queries in relation to this Privacy Statement, or if you would like to contact <u>World Rugby</u> in relation to your rights, please write to us at Data Protection Officer, World Rugby House, 8 – 10 Lower Pembroke Street, Dublin 2. You can also contact our Data Protection Officer by emailing <u>dataprotection@worldrugby.org</u>.

Complaints

If you, have interacted mostly with, and are not happy with the way that <u>LOC25</u> have used your information or addressed your rights, you have the right to make a complaint to the Information Commissioners Office as the LOC25's lead supervisory authority by using the following link - https://ico.org.uk/make-a-complaint/data-protection-complaints/

If you, have interacted mostly with, and are not happy with the way that <u>World Rugby</u> has used your information or addressed your rights, you have the right to make a complaint to the Irish Data Protection Commission as the World Rugby lead supervisory authority by using the following link: https://forms.dataprotection.ie/contact.

Dissolution of LOC25

As outlined above in the introduction to this notice, the LOC25 has been established for the purpose of operating the Women's Rugby World Cup England 2025.

As part of the dissolution or closure process of LOC25 after the Women's Rugby World Cup England 2025 has ended, any personal information that has been collected and processed and retained by the LOC25 will be transferred to and retained by World Rugby. The reason for this is that World Rugby is a shareholder of the LOC25 and will be responsible for ensuring the protection and integrity of your personal information after dissolution or closure of the LOC25. Your personal information shall only be retained by World Rugby in accordance with their respective retention policies and applicable data protection laws.

For further information on how World Rugby handles and/or processes your personal information, please refer to the general World Rugby **privacy policy**.

Changes to this Data Protection Notice

We reserve the right to change and/or update this Data Protection Notice at any time. In such circumstances, we will publish the amended or updated notice on the Platform. We will also notify relevant data subjects of any material changes that may impact them. We therefore recommend that you check (or have checked on your behalf, as applicable) the Platform periodically in order to review the most updated version(s) of this Data Protection Notice (available via your Platform account) and any changes that may have been made to it.

This Data Protection Notice was implemented on 14 May, 2025.

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