

Premier League - Intellectual Property Enforcement Programme

Privacy Notice

Introduction

This page provides more information about how the Premier League collects and uses personal data as part of its efforts to protect and enforce its intellectual property rights. Click here for more information: <https://www.premierleague.com/legal/report-illegal-broadcasting> <https://www.premierleague.com/legal/anti-counterfeiting-programme>

Premier League IP Enforcement Programme		
A. Commercial Premises ("Pubs") Programme The Premier League protects and enforces its intellectual property rights by investigating and taking appropriate action against commercial premises broadcasting unauthorised streams of Premier League matches.	B. Suppliers and Illicit Streaming Services Programme The Premier League protects and enforces its intellectual property rights by investigating and taking appropriate action (including civil or criminal legal proceedings) against suppliers of technology (including physical equipment and software) and services which enable access to and screening of unauthorised streams of Premier League matches.	C. Anti-Counterfeiting Programme The Premier League protects and enforces its and its member clubs' from time to time (the " Clubs ") intellectual property rights by investigating and taking appropriate action against manufacturers / distributors of counterfeit goods and services (i.e. goods bearing the Premier League's and/or Clubs' intellectual property).

If you have received a letter from the Premier League, or from DLA Piper UK LLP (our primary external legal advisors) on behalf of the Premier League, concerning infringements of the Premier League's intellectual property rights, you may have been provided a link to this page.

To read the full **Premier League Privacy Policy**, including information on individuals' rights in relation to their personal data, go to <https://www.premierleague.com/privacy-policy>.

Personal data we collect: how, when and why?

In order to protect and enforce its intellectual property rights, the Premier League needs to collect and use personal data (as described in the table below) about individuals who have, might have or are likely to infringe the Premier League's intellectual property rights (and, depending on the circumstances, other individuals who are related to such individuals).

Much of this personal data is collected through open-source research or provided to the Premier League by our authorised third party investigators. Our primary external legal advisors, DLA Piper UK LLP, will also collect personal data from and/ or about defendants/ potential defendants during correspondence with them and/ or their affiliates.

The table below sets out the type of personal data, as well as when and how, the Premier League typically collects and uses it when investigating and (where appropriate) taking action against infringers. It also sets out the purpose and lawful basis of this collection and use. Please refer to the full **Premier League Privacy Policy**, and the **Glossary** (below) for more information about the requirement for a lawful basis for each processing activity.

Categories of Personal Data	Collection	Purpose	Lawful basis
Names	Open source research and on-the-ground investigations during investigation/ fact gathering phases and discussions with potential defendants and other third parties.	To identify/ communicate with/ take action against those responsible for IP infringements.	Legitimate Interests
Contact details (i.e. telephone numbers and email addresses)	As above.	As above.	Legitimate Interests
Address (residential and/ or premises)	Open source research during investigation/ fact gathering phases and direct from the infringer or affiliates of that infringer.	As above and to identify residential addresses for service of claims.	Legitimate Interests
Affiliations (i.e. friends, family, colleagues)	Open source research during investigation/ fact gathering phases.	Where there are multiple potential defendants, to understand the relationship between them and who is liable, and to identify residential addresses for service of claims.	Legitimate Interests
Job	During investigation/ fact gathering.	To establish level of involvement/ extent of liability.	Legitimate Interests
Photograph	Open source research on the internet (including social media).	Helps counter claims by individuals denying involvement, and to identify person to be served and prove personal service has occurred.	Legitimate Interests
Personal characteristics (i.e. physical descriptions such as age, gender, height, stature, skin	By investigators and open source research on the internet (including social media).	Information helps counter claims by individuals denying involvement, and to identify person to be	Legitimate Interests & Unlawful Acts/ Legal Claims (where Special

Categories of Personal Data	Collection	Purpose	Lawful basis
colour, hair colour etc.)		served and prove personal service has occurred.	Category Data)
Character descriptions (e.g. unfriendly or wary)	Observations through interactions during investigations and communications.	Protecting the safety of investigators and to advise on best approach to conversations.	Legitimate Interests

Depending on your circumstances, you may also choose to provide us with information in relation to your health or financial position, to the extent it is relevant to the investigation/ case. We treat any such information you decide to share with us with particular care to protect the confidential and sensitive nature of such information.

In addition, in relation to our Supplier and Anti-Counterfeiting Programmes only, the Premier League may also process the following categories of personal data, as set out below:

Categories of Personal Data	Collection	Purpose	Lawful basis
Lifestyle data (e.g. hobbies, interests, expenditures)	Observations by investigators on the ground and through open source research on the internet.	To ascertain ability to make payments in respect of infringements and the scale of an infringer's operation.	Legitimate Interests
Criminal Offence Data (in relation to potential IP crimes against Premier League)	Online and in-person investigations.	To ascertain whether liable for criminal offences and take appropriate action.	Unlawful Acts/ Legal Claims
IP addresses	Collected through monitoring of illicit streaming services.	To detect location of servers used by Suppliers to provide illicit streaming services.	Legitimate Interests

Who does the Premier League disclose personal data to?

In order to successfully operate its intellectual property enforcement programme, it is necessary for the Premier League to share personal data (as described above) with third party organisations, including (depending on the circumstances) our external legal advisors (including DLA Piper UK LLP), our investigators and operatives (including FMTS, ID Inquiries, Irdeto, Pointer and Back Four); industry enforcement operators (such as FACT) and law enforcement authorities (Trading Standards and the Police).

How long does the Premier League keep this personal data?

The Premier League retains all personal data which is relevant to its investigations and/or legal proceedings for as long as necessary to effectively protect itself against those who repeatedly infringe the Premier League's intellectual property.

However, the Premier League takes precautions to ensure that sensitive personal data is treated with due care and that irrelevant and/or excessive personal data is securely deleted.

GLOSSARY

Term	Meaning
Criminal Offence Data	Personal data relating to criminal offences and convictions (including allegations thereof).
Legal Claims	<i>One of the grounds on which Criminal Offence Data can be processed:</i> Where it is: (a) necessary for the purposes of, or in connection with, any legal proceedings (including prospective legal proceedings); (b) necessary for the purpose of obtaining legal advice; or (c) otherwise necessary for the purposes of establishing, exercising or defending legal rights.
Legitimate Interests	<i>One of the grounds on which personal data can be processed:</i> Where it is necessary for the legitimate interests pursued by the controller, or a third party (as long as such interests are not overridden by the interests or fundamental rights and freedoms of the data subject).
Special Category Data	Personal data which is more sensitive. For example, information about an individual's race, ethnic origin, or health.
Unlawful Acts	<i>One of the grounds on which Criminal Offence Data can be processed:</i> Where it is necessary for the prevention or detection of unlawful acts.