

## Eventbrite & the General Data Protection Regulation (GDPR)

*Eventbrite takes data privacy and security very seriously. We take steps to make sure that we comply with our data privacy law obligations and make it easy for our Organizers to comply with their respective obligations too. With GDPR set to take effect in May 2018, Eventbrite updated our data privacy program so that we, and our Organizers, are comfortable that we will meet the new requirements.*

Here are a few highlights:

### **1. Eventbrite's data processing obligations.**

Eventbrite as a data controller. Where an Organizer creates an account with Eventbrite to organize and ticket their events, Eventbrite will be a data controller over the personal data that Organizers provide about themselves as part of their account. Similarly, where a Consumer provides Eventbrite with personal data in the course of creating an account, Eventbrite will be a data controller over the personal data that Consumer provides as part of their account. Eventbrite will also be a data controller of the personal data that Eventbrite obtains in the course of an Organizer or Consumer's use of Eventbrite's services, which Eventbrite may then use to conduct research and analysis, improve our products and features, and provide targeted recommendations.

### **2. Eventbrite as a data processor.**

However, Eventbrite will be a data processor over a Consumer's personal data that Eventbrite obtains as a result of providing its core ticketing services to our Organizers. For example, allowing Organizers to learn more about Consumers during the ticket purchase, facilitating the transmission of emails to Consumers at the request of the Organizer, processing payments, or providing event reports and tools so Organizers can gain insights into the effectiveness of various sales channels.

Given that Eventbrite processes a Consumer's personal data both in providing services to the Organizer, and in servicing the Consumer directly in his or her use of Eventbrite, Eventbrite may be both a controller and a processor of the same personal data and will be held to different processing obligations as a result.

### **3. Data Processing Addendum for Organizers and Subprocessors.**

As a data processor processing Personal Data on behalf of the Organizer, Eventbrite will need to be subject to a Data Processing Addendum. As of April 3, 2018, and taking effect May 3, 2018 for existing Organizers, our Terms of Service will incorporate a Data Processing Addendum (DPA) for Organizers, which includes Eventbrite's legal obligations as a processor consistent with the GDPR.

Consistent with the DPA for Organizers, Eventbrite will publish on or about April 3, 2018, a public facing list of Eventbrite's Subprocessors.

### **4. Email Tools.**

We offer the ability for Organizers to email Consumers directly through our platform. This functionality was built to send service related emails related to an Organizer's specific event. If an Organizer wants to use this function for marketing purposes, it needs to secure its own compliant opt-in consents for the sending of marketing emails. Eventbrite does not do this on an Organizer's behalf.

## **5. Data Deletion.**

As a data controller of our account-holding Consumers, Eventbrite will adhere to a Consumer's request that Eventbrite delete that Consumer's personal data. As a result, there may be a time when your Organizer dashboard will show anonymized personal data for a particular attendee, however the financial data associated with that attendee should remain as part of the event. Similarly, if Eventbrite removes personal data on its own in accordance with our internal data retention policy, this same view within the dashboard will appear.

In the event an Organizer's data retention needs require that Eventbrite no longer provide such Organizer with access to the personal data of its former attendees, the Organizer can accomplish this by removing the event from its dashboard. Should the Organizer still need access to the non-personal event data, it should first download the event to a .csv or text file and manipulate that file as it sees fit.

## **6. Cross-border Data Transfers.**

Eventbrite's data is physically located in the United States. In order to ensure that personal data can be lawfully transferred from the EU to our US-based servers, Eventbrite certifies to the EU-US Privacy Shield framework operated by the US Department of Commerce.

Eventbrite's certification was effective 14th October 2016. You may review Eventbrite's Privacy Shield Notice [here](#), also available from Eventbrite's Privacy Policy.

## **7. What else is Eventbrite doing as a result of GDPR?**

- a. **Accountability and Training.** We're revamping our internal data privacy guidelines to make sure they're in line with the GDPR and we're making sure that all of our employees are trained on them appropriately. This means that everyone at Eventbrite plays a role in handling personal data in a legitimate and fair way.
- b. **Privacy by Design.** We're implementing enhanced guidelines to help ensure that all of our systems and tools that collect and store personal data are designed in a privacy-friendly way. By doing this, we can reduce privacy risks at the outset and offer our Organizers and Consumers more control over their information.
- c. **Data Privacy Impact Assessments.** We're implementing new internal protocols to make sure that certain activities involving personal data will go through a Privacy Impact Assessment, measuring compliance with the GDPR while also allowing for ease of record keeping. This means we can be confident that new products and services that we offer respect our Organizers' and Consumers' privacy rights.
- d. **Our Privacy Policy.** The GDPR will require us to give people more information about what we do with their personal data. To that end, we're currently working on revisions to our privacy policy, which will be published in early April 2018. These changes will offer even greater transparency about how we handle personal data.
- e. **Suppliers.** We're reviewing our supplier contracts to make sure that they meet the new requirements of the GDPR and are compliant with rules on international data transfers. We'll be requiring and expecting more from our suppliers who handle personal data on our behalf.