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April 24, 2019


Las Vegas Stadium Authority
c/o Applied Analysis
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To Whom It May Concern:


I am a Raiders fan, Las Vegas resident, and Personal Seat License holder. I am writing to you because I recently learned¹ that an Android or iOS app is going to be required for entry to the stadium, and there will be no other ticketing option for attendees who do not consent to the app's privacy policies.


The current version of the app (1.7.4) on Google Play² is a privacy nightmare. It requires the following permissions:

-  Device & app history
 - retrieve running apps

-  Contacts
 - read your contacts

-  Location
 - approximate location (network-based)
 - precise location (GPS and network-based)

-  Phone
 - read phone status and identity

-  Photos/Media/Files
 - read the contents of your USB storage
 - modify or delete the contents of your USB storage

¹ Voicemail message from Daniella Smith, April 24, 2019.

² <https://play.google.com/store/apps/details?id=com.yinzcam.nfl.raiders>

 Storage


- read the contents of your USB storage
- modify or delete the contents of your USB storage

 Camera

- take pictures and videos

 Wi-Fi connection information

- view Wi-Fi connections

 Device ID & call information

- read phone status and identity

Other

- receive data from Internet
- view network connections
- create accounts and set passwords
- read battery statistics
- pair with Bluetooth devices
- access Bluetooth settings
- connect and disconnect from Wi-Fi
- control flashlight
- full network access
- control Near Field Communication
- run at startup
- control vibration
- prevent device from sleeping
- modify system settings

Furthermore, the Raiders privacy policy³ prominently states:

We may share your information (including, without limitation, personally identifiable information) with subsidiaries, affiliates, sponsors and/or advertisers of The Oakland Raiders.

I fail to see why admission to the Las Vegas Stadium should be contingent on allowing the Raiders to collect—and sell to third parties—the contents of my address book, any photo or video I've ever taken, or private data from other applications I may

³ <https://www.raiders.com/footer/privacy-policy>

have installed on my phone. Furthermore, I see no reason why a “ticketing” app should be permitted to delete my files or modify my phone’s settings.

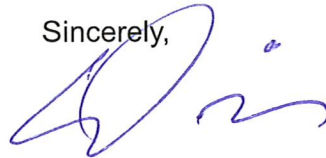
As a taxpayer, I am also extremely concerned about the liability the stadium authority is accepting by collecting this data. How much money is being spent to protect this highly-sensitive personal data, and on insurance to cover data breaches? How is the stadium ensuring compliance with the patchwork of privacy regulations worldwide?

By way of example, the European Union’s General Data Protection Regulation⁴ (GDPR) applies to European citizens worldwide, including those who might visit Las Vegas and choose to attend an American football game. Not permitting stadium attendees to opt out of using this app is in direct contradiction to the GDPR, and is almost guaranteed to lead to massive fines.

There seem to be practical considerations as well. For instance, what happens if a fan wants to leave their phone at home? Or if their battery dies? Or if they own a phone not made by either Google or Apple?

I realize the 2020 football season is still a ways off, but I would encourage the stadium authority to reconsider this brain-dead and fan-hostile policy ASAP. Thank you for your time in addressing this matter.

Sincerely,



Dave Pifke

⁴ <https://eur-lex.europa.eu/eli/reg/2016/679/oj>