

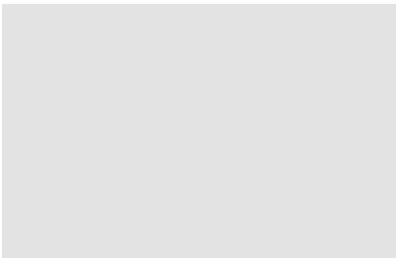
Sports, Data, and Rights: The Use of Facial Recognition in Brazilian Stadiums

CENTER OF SECURITY AND CITIZENSHIP STUDIES

DATAFICATION AND DEMOCRACY FUND

Final Narrative Report

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PROJECT SUMMARY

The increasing datification of public spaces, especially in leisure and cultural environments such as soccer stadiums, requires a critical assessment of the implications for citizens' rights and freedoms. The project aims to analyze the impacts of facial recognition in Brazilian stadiums. By mapping facial recognition and examining its consequences, the project aims to contribute to an informed debate and the development of public policies that safeguard fundamental rights and promote a fairer and more democratic society. In addition, analyzing the impacts relating to markers of difference is essential to understanding and combating the forms of discrimination these technologies can exacerbate. The project is divided into two phases: research and advocacy. In the research phase, we will collect and analyze data acquired through transparency portals, reports in mainstream media, and requests under the Access to Information Act. We also interviewed experts, public and private managers, fans, and representatives of organized supporters. In the advocacy stage, we will hold a series of conversations with public and private managers, activists from Brazil and other countries, organized supporters, and fans in order to establish a dialogue about the research findings and exchange information and methodologies.

PROGRAM ACTIVITIES AND RESULTS

1. We conducted field work during the São Paulo x Bahia and Palmeiras x Corinthians matches. The team documented the data flow between private security companies and public security agencies, observing how information is processed and shared. We also held three meetings with organized supporters, conducting semi-structured interviews to understand their perceptions of using stadium surveillance technologies.
2. We finalized the communication strategy and hired a press officer. We visited Nave do Conhecimento, an educational center in Penha, Rio de Janeiro neighborhood, and signed a partnership to launch the report there on August 27, 2024.
3. We met with state deputy Dani Monteiro's team to discuss the legislative implications of surveillance at sporting events. The conversation touched on data protection and the need for regulations that guarantee transparency and fans' rights, especially about the use of biometric data.

4. We contacted soccer clubs across Brazil to gather information on their policies for collecting and processing data on minors. The aim was to assess the clubs' compliance with current data protection legislation for children and adolescents.
5. We delivered the first version of the report for internal review, which included a preliminary analysis of the data collected and conclusions about the impact of facial recognition on fan behavior and privacy issues.
6. Revision and adjustment of the executive summary to ensure greater clarity and impact.
7. We organized a meeting to define the strategy for advocating and disseminating the report's findings. We focused on engaging government agencies, civil society, and the sports community to foster a broader debate on surveillance technologies in sports.
8. We began publicizing the event with promotional materials and contact with the press, highlighting the report's main findings.
9. We held meetings with the office of state deputy Carlos Minc to discuss Bill PL 3476/2024, which proposes a risk audit for facial recognition projects in Rio de Janeiro.
10. During the Flamengo vs Bolívar soccer match, we observed the use of surveillance technologies in the context of international tournaments. At the Botafogo vs Flamengo soccer match at the Nilton Santos Stadium, we documented the practical use of facial recognition technology and fans' perceptions of privacy and security.
11. We prepared press releases and press kits for organized supporters, including an executive summary of the research.
12. The report was launched digitally and at a face-to-face event at the Nave do Conhecimento, attended by 73 participants, including activists, organized fans, students, and government representatives.
13. The impact of the digital launch was 172 articles published in the press and 12,871 views on social media.

14. We took part in a public hearing at Assembleia Legislativa do Rio de Janeiro (ALERJ) to present the report's conclusions and discuss possible legislative changes to regulate the use of facial recognition in sports venues, considering the concerns raised in the study.
15. On September 29, we spoke with representatives of Colombian public institutions to share experiences and discuss the report. This meeting sought to create a regional dialog on using biometric technologies in public and private spaces, promoting knowledge exchange and collaborative action.
16. Finally, we finish with a meeting to discuss and evaluate the project's results and the impact on media, social media and within special interested groups.

MAIN LEARNINGS DURING THE PROJECT

The implementation of this project presented a series of challenges that required constant adaptation and the formulation of new strategies to achieve the proposed objectives. One of the main challenges that we faced was accessing information on facial recognition technologies used by soccer clubs and security companies. Collecting data and obtaining clear and detailed answers about surveillance procedures was made difficult by the lack of transparency on the part of the entities responsible and the complexity of the flow of information between the public and private sectors.

In this sense, we saw the need to establish direct contacts and strengthen relationships with strategic players, such as organized football fans, government representatives, and the media, to increase the project's visibility and pressure for more effective responses. During the data collection process, it became evident that some companies avoided providing complete or detailed information about the technologies and data processing procedures. This scenario required a more assertive approach to requests for information access, interviews with different stakeholders, and a continuous adaptation of our research methods to circumvent information gaps.

In addition, a significant challenge identified was the legal limbo surrounding the use of facial recognition in stadiums and the processing of children's and adolescents' data. Despite the existence of the Statute of the Child and

Adolescent (ECA) and the General Data Protection Act (LGPD), which establish guidelines for the protection of minors' data, we observed that there is a great deal of uncertainty about the application of these laws in the sports context. Clubs and security companies often rely on flexible interpretations of the rules, which creates uncertainty about the use of these technologies and the real protection of minors' rights. This scenario has highlighted the need for a more in-depth debate and specific regulations to guide the use of these tools in sports environments and guarantee the safety and privacy of fans.

Another significant challenge was the need to strengthen the project's communication strategy. Given the complexity of the subject and the impact expected with the report's launch, we needed to hire a press officer to help us disseminate the results and contact the media. In addition, we identified the need to hire a clipping company to measure the project's impact on the media and assess the scope of the discussions generated by the report. These actions proved essential to ensure more effective communication and measure the reach of our messages with the public and stakeholders. We observed that acceptance and understanding of the use of surveillance technologies varies significantly between different groups of fans and other stakeholders. These differences taught us the importance of approaching the topic in a sensitive and contextualized way, considering the experiences and concerns of each group and seeking to create an open and inclusive space for dialogue.

We also faced logistical and coordination challenges, especially regarding carrying out fieldwork in different states and reconciling the team's availability with match and event schedules. To overcome these difficulties, we strengthened internal communication and established a more flexible schedule, which allowed for better activity organization and optimization of available resources.

One aspect that stood out as a learning experience was the importance of strategic communication and building a clear and convincing narrative to raise awareness among different audiences about the risks and impacts of surveillance technologies. Experience has shown that it is essential to adapt language and approaches according to the target audience, whether legislators, fans, or civil society. This understanding motivated us to invest more time and resources in creating communication materials, such as infographics, accessible reports, and launch events, to disseminate our results more effectively.

Finally, one of the main legacies of the project was establishing a network of dialogues and actions that included public hearings, meetings with fans and club representatives, and discussions with the National Data Protection Agency (ANPD). The public hearings made it possible to take the debate on using facial recognition technologies into the legislative arena, where we presented proposals and contributed to formulating more straightforward and transparent public policies. The meetings with organized supporters strengthened the relationship with the groups most impacted by surveillance. They made it possible to identify their main concerns and demands, creating a direct communication channel with these actors. Dialogue with the ANPD was essential for exploring the intersections between regulation, data protection, and biometric technologies at sporting events.

With the project, we could meet some researchers and institutions from other countries that are facing similar issues with surveillance in stadiums. From these dialogues, it was possible to establish a solid basis for future joint actions and foster a space for exchanging experiences and discussing strategies for tackling the abuse of these technologies, promoting lasting change based on principles of justice, transparency, respect for human rights, and strengthening democracy.

MAIN OBSTACLES DURING THE PROJECT

During the project's implementation, we encountered several obstacles that required careful management and innovative strategies to overcome and achieve our objectives. The main challenges included difficulties in accessing relevant information, complex logistical issues, changes in the sports calendar, and the need to adapt our communication and engagement strategies.

One of the biggest issues was the lack of transparency from the football clubs and the companies responsible for implementing facial recognition technologies in the stadiums. The responses to our requests for information were often incomplete or lacked the necessary details for an in-depth analysis. Additionally, some organizations were reluctant to share information about data flows, personal data processing procedures, and their collaboration with public security agencies. This environment of opacity made it challenging to develop an accurate and comprehensive diagnosis of the use of these technologies in the sports context. As a result, we had to

rely on multiple sources and strategies to overcome these obstacles, such as increasing the number of interviews with stakeholders and deepening our analysis of official documents obtained through information requests.

Another significant issue was the unclear legal context regarding using facial recognition in stadiums, especially concerning handling children's and adolescents' data. Although the Child and Adolescent Statute (ECA) and the General Data Protection Law (LGPD) establish clear guidelines for protecting minors' rights, no specific regulations address biometrics in sports venues. This lack of clarity has allowed clubs and responsible companies to interpret the norms flexibly, creating a scenario of legal uncertainty. Consequently, we had to dedicate more time to legal research and consult with experts to ensure that our analyses complied with existing legislation and could support concrete and feasible recommendations for public policy formulation.

Besides the challenges related to information access and legislation, we faced logistical issues during fieldwork activities. The need to conduct research and on-site observations in different states across Brazil required complex coordination of the team and constant schedule adjustments to align with match agendas and other sports events. The scenario was further complicated by the heavy rains that hit the state of Rio Grande do Sul, which led to the suspension of several Brazilian Championship matches. As a result, many field activities had to be rescheduled to fit the new sports calendar, causing significant delays in data collection and the critical analyses necessary for the project's progress.

Another relevant challenge was strengthening our communication strategy throughout the project. Initially, we had planned to use internal resources to disseminate the results and engage with the media. However, during the process, we realized that hiring a specialized press office would be necessary to increase our actions' reach and visibility. The emergency hiring of a press office and a clipping service company occurred at an advanced stage of the project, which caused difficulties in adapting communication strategies and integrating with the new partnerships. This late adjustment resulted in initial challenges in aligning communication activities with the production and launch schedule of the project's content.

Within the scope of communication, we also noticed that the acceptance and understanding of surveillance technologies varied significantly among different groups of fans and other stakeholders. While some fans viewed the implementation of facial recognition as a security measure that helps reduce

violence in stadiums, others saw it as a violation of rights and an increase in control over individual freedom. These differences highlighted the importance of addressing the topic in a sensitive and contextualized manner, considering the experiences and concerns of each group and seeking to create an open and inclusive dialogue space.

Finally, the impact of the weather and changes in the sports calendar caused a series of setbacks. The heavy rains in Rio Grande do Sul, which led to match suspensions, presented an unexpected challenge for organizing fieldwork. With changes in the game schedules, we had to redesign the activity agenda, which caused delays in the planned data collections for that period and increased the workload for the team in the following months. The need to readjust the calendar while maintaining the quality of observations and analyses was one of the main obstacles faced during the project. However, our team's adaptability and resilience were evident in how we managed to maintain the quality of our work despite these challenges.

Despite these obstacles, we developed creative solutions to overcome them, such as restructuring the schedule and strengthening partnerships. These actions allowed us to adapt the project to the changes and proceed with delivering the planned results. The challenges faced reinforced the team's resilience and capacity to adapt to complex and dynamic scenarios.

RELATION WITH DATAFICATION AND DEMOCRACY

The intersection between datafication and democracy permeates the methodology and outcomes of this project, revealing how the mass collection of data affects democratic dynamics and fundamental rights. By investigating the implementation of facial recognition technologies in stadiums across Brazil, we found that transforming the behavior and identities of fans into measurable data is not merely a technical issue but also a political one. In this context, datafication becomes a tool that, while promising to enhance security, simultaneously poses significant risks to privacy and transparency—critical pillars of a democratic society.

The collection and processing of biometric data in stadiums illustrate how datafication can be used as a mechanism of social control. The information captured by facial recognition cameras is stored and analyzed, enabling the

tracking and monitoring of individuals. It creates an environment in which every action of a fan is converted into data points that can be collected and interpreted by third parties, often without the proper consent or knowledge of those affected. During the project's development, we found that this process frequently occurs in an opaque and unregulated manner, making fans vulnerable to the misuse of personal information and, ultimately, violating democratic principles.

The project revealed that lacking specific regulations and effective control mechanisms over these technologies increases the likelihood of discriminatory practices and rights violations. Although there are laws that should protect fan data, such as the General LGPD and the ECA, we observed a legal vacuum regarding the application of these laws in the sports context. This gap allows football clubs and private companies to interpret the rules flexibly, creating legal uncertainty and fragility of citizens' rights. Thus, instead of serving as a transparent and responsible innovation tool, datafication ends up extending control and surveillance zones.

In addition to the legal challenges, we identified the lack of transparency as a central issue. During interviews and analysis of official documents, we noticed no explicit disclosure of how biometric data is stored, how long it is kept, and with whom it is shared. This opacity prevents social control and weakens the ability to hold institutions accountable, generating an imbalance of power between those who collect and process the data and the individuals whose information is captured. This mismatch between data collection and communication with the public underscores the urgent need for public policies that guarantee greater transparency and require a more participatory and informed process for the use of surveillance technologies.

The project also revealed that facial recognition in stadiums is not homogeneous and that fans' perceptions of this technology vary considerably. While some see surveillance as a tool to enhance security and reduce violence, others perceive these devices as an invasion of privacy and a threat to their freedom. These divergences reflect the social and political impact of datafication, which can create an environment of forced compliance, where citizens, being constantly watched, end up accepting practices they do not necessarily understand or agree with. In this sense, it becomes clear that datafication reshapes the democratic space for contestation and debate by reconfiguring the interactions between citizens and control institutions.

In this way, the results of the project not only confirmed initial concerns about the risks of using surveillance technologies in sports events but also demonstrated the complexity of balancing the alleged security benefits with democratic principles of transparency, privacy, and freedom. Therefore, one of the main recommendations developed was the creation of specific regulations that address the use of biometrics in stadiums, accompanied by impact reports that assess the risks and benefits of these technologies, as well as social control mechanisms that ensure fans' participation in the formulation and monitoring of these policies.

The need for engagement with regulatory agencies, such as the National Data Protection Authority (ANPD), also emerged as a priority to define guidelines that ensure the proper application of the LGPD in the sports context. The requirement of explicit and informed consent for the collection of biometric data and the definition of transparent practices for the storage and sharing of this information are essential elements to mitigate the risks associated with the use of surveillance technologies.

The relationship between datafication and democracy is, therefore, marked by tensions that arise when the transformation of individuals into measurable data begins to redefine power relations. Without a broad public debate and clear regulations, the use of surveillance technologies in football stadiums can easily result in an exacerbated surveillance state, undermining trust in institutions and, consequently, the quality of democracy. Thus, the methodology and results of this project contribute to understanding the complexities involved in using new technologies for security and surveillance, highlighting the need to balance innovation with respect for the fundamental rights and guarantees of citizens.