



May 7, 2026

Rob Bonta  
Attorney General of California  
California Department of Justice  
300 S. Spring Street, First Floor  
Los Angeles, CA 90013

Re: Request for Investigation — FIFA World Cup 2026 Accreditation Terms and Conditions /  
California Privacy Rights Act and Related State Law

Dear Attorney General Bonta:

The undersigned organizations write to request that your office investigate and take swift legal action to cease FIFA's accreditation process which has put stadium workers in an impossible bind of having to choose between their livelihood and their right to privacy under California law. Currently, FIFA is collecting stadium workers' most sensitive personal data to share it with the Department of Homeland Security. Already under fire for failing to ensure protections for World Cup attendees amid the Trump administration's brutal anti-immigrant tactics, FIFA is now endangering the very workers inside the U.S. who make the World Cup possible.<sup>1</sup>

As a non-negotiable condition for getting credentialed to work, FIFA is requiring that stadium workers—along with journalists—disclose sensitive personal data such as Social Security Numbers, residential address, nationality, and country of birth, while waiving their California data privacy rights, including limits on data sharing and the right to legal recourse. According to FIFA's accreditation policy, personal data can be shared with "law enforcement agencies, intelligence agencies, other departments of the host cities and with international partner agencies" when "deemed necessary" a definition that is met within FIFA's sole discretion.<sup>2</sup> According to its Privacy Notice, FIFA plans to store U.S. workers' personal information "in a database in Western Europe" and retain it "for as long as necessary."<sup>3</sup>

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<sup>1</sup><https://www.aclu.org/news/human-rights/aclu-joins-coalition-calling-for-fifa-to-uphold-human-rights-ahead-2026-world-cup/>;

<https://kennedyhumanrights.org/press/ninety-u-s-civil-society-groups-express-deep-concern-to-fifa-about-immigration-policies-ahead-of-2026-world-cup/>;

[https://www.hrw.org/sites/default/files/media\\_2026/04/2026%20World%20Cup%20Reporters%27%20Guide%20web\\_0.pdf](https://www.hrw.org/sites/default/files/media_2026/04/2026%20World%20Cup%20Reporters%27%20Guide%20web_0.pdf)

<sup>2</sup> FIFA Accreditation Terms & Conditions

<sup>3</sup> FIFA Privacy Notice, Accreditation for the FIFA World Cup26

Public statements from the FBI reveal that data for FIFA accreditation will be shared with the Department of Homeland Security (DHS). In an April 2026 Senate Appropriations Committee hearing, the FBI's senior coordinating official on the White House Task Force on the FIFA World Cup 2026 stated that **DHS is a “key partner” in the accreditation process, and that DHS is “responsible for the electronic transfer of significant amounts of data from FIFA into FBI systems.”**<sup>4</sup> Sharing workers' Social Security Numbers with an agency that houses ICE and CBP puts the workers who are delivering the World Cup at risk of being unlawfully targeted, detained, and deported without due process.

This is not just a suspicion—this is the Trump administration's plan. According to ICE's acting director Todd Lyons, “ICE, specifically Homeland Security Investigations [HSI], is a key part of the overall security apparatus for the World Cup.”<sup>5</sup> HSI, a division within ICE that conducts workplace raids, would have access to workers' data as a result of FIFA's actions.<sup>6</sup>

FIFA's data-sharing violates key provisions of the California Consumer Privacy Act, which governs data privacy for both workers and consumers in California.<sup>7</sup> Specifically, FIFA's accreditation process violates workers' rights under the CCPA, as well as California's Article I constitutional right to privacy by<sup>8</sup>:

- Failing to provide adequate notice at collection. The phrase “where deemed necessary” for triggering personal data sharing with third parties is not adequate notice. Cal. Civ. Code § 1798.100(a)(1)-(2).
- Coercing worker consent and leading to invalid consent in violation of the CCPA. *See* Cal. Civ. Code §§ 1798.125(b)(4), 1798.135(1). FIFA's accreditation process allows employers to attest to consent on behalf of entire worker groups without a worker's individualized assessment.
- Posing a serious intrusion into workers' inalienable right to privacy by sharing personal data with domestic federal law enforcement agencies and foreign intelligence agencies at FIFA's unilateral discretion. *See* Cal. Const. Art. I, § 1.
- Processing workers' personal information, when it plans to share the data with law enforcement agencies and unknown third parties, without conducting a risk assessment as is required under the CCPA. FIFA's collection of workers' most sensitive personal information—including but not limited to social security numbers, nationality, country of birth and residence information—undoubtedly presents a “significant risk” to workers' privacy. As such, FIFA had to conduct a risk assessment *before* demanding workers to hand over this information. *See* Cal. Civ. Code § 1798.100.
- Imposing Swiss or Florida law on all disputes related to its unlawful sharing of worker information; California residents cannot waive their right to having statutory protections protected by California law, including the right to bring claims in California courts under the CCPA. *See* Cal. Civ. Code § 7150.

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<sup>4</sup><https://www.fbi.gov/news/speeches-and-testimony/statement-of-special-agent-in-charge-douglas-olson-to-senate-appropriations>

<sup>5</sup> <https://www.theguardian.com/football/2026/feb/10/ice-director-testimony-world-cup-2026-operations>

<sup>6</sup> <https://www.americanimmigrationcouncil.org/fact-sheet/understanding-ice-worksites-raids/>

<sup>7</sup> <https://cppa.ca.gov/faq.html#:~:text=It%20includes%20California%20residents%20that,see%20For%20California%20Residents%20section.>

<sup>8</sup> <https://laborcenter.berkeley.edu/wp-content/uploads/2023/11/Summary-Worker-Rights-Under-the-CCPA-CPRA.pdf>

- Failing to identify the categories of third-party recipients and the purpose of disclosing workers' data with these unidentified third-party recipients. *See* Civ. Code §§ 1798.100, 1798.115.
- Failing to provide workers with any method to limit FIFA from using and disclosing their sensitive personal information for non-business purposes as defined under the CCPA. Workers have the right to limit businesses from disclosing their sensitive personal information “to that use which is necessary to perform the services or provide the goods” as reasonably expected by the average worker or consumer. Cal. Civ. Code §§ 1798.121, 1798.140.

Given these widespread violations, the undersigned urge your office to promptly investigate FIFA's accreditation process and to publicly affirm California's commitment to protecting workers' privacy and safety. We urge your office to take swift legal action to protect workers' rights under California law.

FIFA's accreditation process runs counter to California law and to its 2026 slogan that “Football Unites the World.” Stadium workers are the backbone of the World Cup experience for fans—they proudly prepare food, serve drinks, and clean the stadium. These workers are being put in an impossible bind, where they are being forced to choose between their livelihoods and handing over their most personal sensitive information. Workers in California should not be forced to make this choice.

**Sincerely,**

**ACLU of Southern California**

**UNITE HERE! Local 11**

**Los Angeles Alliance for a New Economy (“LAANE”)**