

ITF Privacy Notice – Players in ITF development programmes / Grand Slam Player Development Programme ('GSPDP')

Note: This Privacy Notice does not apply to your participation on the ITF Tours or in any Davis or Billie Jean King Cup competition (whether at junior level or above). Please refer to the appropriate ITF Privacy Notice for how your personal data is processed for those competitions.

Please read this notice carefully.

The most recent changes to this Notice are underlined.

1. About Us

ITF Licensing (UK) Limited trading as the International Tennis Federation (ITF) is a data controller of any personal data it collects and holds about you. The ITF is referred to as “we”, “us” and “our” in this privacy notice. We are a company registered in England and Wales under company number 02584446. We are registered on the Information Commissioner's Office Register; registration number Z5603782.

We are committed to protecting and respecting your privacy in accordance with the applicable data protection laws which impose certain obligations on us as a data controller. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

We may need to change this privacy notice in the future. If we make any substantial changes that materially affect you, we will inform you before they take effect. We may also provide you with other specific privacy notices if we process different types of data for you. You can find a list of all our privacy notices here: <https://www.itftennis.com/about/help/privacy-notice.aspx>.

If you require any further information, or wish to contact us about how we collect and store your data, our contact details are:

Address	Bank Lane, Roehampton, London UK, SW15 5XZ
Telephone Number	+44 20 8878 6464
Data Protection Officer's Email	dataprotectionofficer@itftennis.com

To comply with the General Data Protection Regulation (2016/679) we have appointed a European representative. If you wish to contact them, their details are as follows:

Bird & Bird GDPR Representative Services SRL
Avenue Louise 235
1050 Bruxelles
Belgium
EUrepresentative.ITF@twobirds.com
Key Contact: Vincent Rezzouk-Hammachi

2. Who this privacy notice applies to

This privacy notice explains how we will use the personal data of anyone who:

- is nominated as a member of an ITF/GSPDP Touring Team
- attends an ITF training camp or training centre (e.g. Regional Training Centre in Tunisia)
- is a recipient of a Grand Slam player grant
- is a recipient of any other grant, scholarship or ITF-administered bursary
- attends a junior development programme
- attends an ITF Junior Tennis Initiative¹
- an individual or group/school point of contact who registers or attends an ITF Tennis Festival.²

Each such person is referred to as “you” and “your” in this privacy notice.

3. How we obtain your personal data

We collect and process your data when you:

- register to attend or participate in a training or development programme
- accept an offer of a grant or bursary
- complete a Pre-Tour report form or medical questionnaire
- register for and use the ITF Athlete Management System
- register for and then undertake online learning courses such as ITF Education
- communicate with us in relation to any of the above.

We may also obtain data about you:

- that is publicly available, such as information from media, websites, and your social media accounts;
- from other organisations, including our National Associations and Regional Associations, the ATP, WTA and the Grand Slam Board, where those other associations lawfully share your information with us;
- from development officers, training centre staff, coaches, other players and officials, in relation to the programme you are involved in (such as a touring team, or training centre);
- from physiotherapists and medical practitioners who we assign to attend our training camps and programmes or who you engage personally, and who assess you for injury and/or fitness-to-play.
- from other regulatory bodies or law enforcement as part of our role and responsibilities as the regulator of ITF competitions and only when that information relates to regulatory or criminal investigations in respect of safeguarding issues or other matters prohibited under our terms of engagement with you;
- when we ask you to complete optional surveys that we use for research purposes and to provide you with a more relevant player and user experience; and
- when you digitally interact with the ITF via our websites and other digital channels, for example our player portals and the resources that you access which may include the use of cookies (subject to our Cookie policy).

¹ Please see Appendix A to this Privacy Notice for processing specific to the Junior Tennis Initiative.

² Please see Appendix B to this Privacy Notice for processing specific to the Tennis Festival.

4. The types of personal data we process

We may process a wide variety of personal data about you, including personal data about:

you as an individual	<ul style="list-style-type: none"> • full name • email address, home address and telephone numbers • gender • date of birth • nationality • appearance (photos and/or videos) • country of residence • language spoken • passport details, birth certificate and/or residency cards to verify your nationality or age • <u>your ITF Tennis ID</u> • religion • for children under 18yrs: <ul style="list-style-type: none"> ◦ parental consent forms ◦ name and contact details of parents/guardians giving consent;
your financial details (if applicable)	<ul style="list-style-type: none"> • your (or your nominated financier's) bank account details (account number and sort code) when you provide these to us for the purposes of payments to you • your (or your nominated financier's) credit or other card details (number, expiry, security code, name, billing address) when you provide these to us for the purposes of processing a payment to services
other information identifying you (to access the Athlete Management System)	<ul style="list-style-type: none"> • password • memorable date / name / place • secret question and answer which may relate to you or people you know
your playing information	<ul style="list-style-type: none"> • activity and results in our training programmes, <u>tours</u>, competitions, and other international tennis competitions such as the ATP tour, WTA tour, and the grand slams • ranking (ATP, WTA, ITF, national and regional) • tennis biography details such as when you started playing tennis, preferred surface, playing hand/doubles hand • <u>ITF World Tennis Number and your ITF World Tennis Number confidence level (singles and doubles)</u> • any other information you provide us for your tennis biography, or as part of a pre-tour report
your compliance with our regulations	<ul style="list-style-type: none"> • information relating to potential or actual Code of Conduct violations when you are participating in our competitions as a Touring Team member or grant recipient • information that you provide in response to enquiries or investigations under relevant regulations
your preferences	<ul style="list-style-type: none"> • whether you wish to receive marketing from us and which types of marketing material you would like to receive
your profile and how you use our	<ul style="list-style-type: none"> • details of our services with you, including how you access and use those services, for example via smart phone application, web browser etc • cookies

products and services	
your correspondence	<ul style="list-style-type: none"> information contained in any correspondence, or communications received or sent by you.
your medical information	<ul style="list-style-type: none"> details (if any) about your health and medical history (allergies, vaccinations, medications) as well as your racial and ethnic background that you provide to us or that we receive from our physiotherapists and medical practitioners who are assigned to assess you.

5. How we will use your personal data and the legal basis for using that personal data:

Performance of our contract with you	
Fulfil the contract of service that you enter into with us (e.g. when you sign an invitation letter to one of our training centres, training camps, teams, development programmes or accept payment of a grand slam or ITF grant)	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> verify your identity, address and other information provided to us about you assist in any visa application receive and manage payments take steps in accordance with or linked to fulfilling our contractual obligations for the services we supply to you including facilitation of the Athlete Management System ensure our coaches and tutors can tailor their teaching to your needs, if you or your parents provide a credit or debit card, we use third parties to check the validity of the sort code, account number and card details you submit in order to prevent fraud communicate with you
Enable our business and pursue our legitimate interests or those of a third party	
Manage our training camps and centres and development programmes	<p>We will use your personal data to:</p> <ul style="list-style-type: none"> organise, facilitate and promote our camps, centres, player initiatives development programmes and related events, including your safe participation in those programmes ensure that you receive the best training and education opportunities to develop your tennis game provide accurate information to your National and/or Regional Association and the other tennis governing bodies, including each of the Grand Slams including your ITF ranking, email address, nationality, DOB and the scope of any player grant or bursary that you are entitled to
Development of the game	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> develop tennis as a global sport and encourage participation;
Regulate and protect the integrity of the game	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> ensure your adherence to the rules and codes of conduct that apply to the programme that you are involved in (e.g. ITF Training Centre Rules; Touring Team code of conduct, Training Camp code of conduct) investigate and resolve any disciplinary issues or potential breaches of our Welfare Policy that you may be involved in

	<ul style="list-style-type: none"> uphold the highest standards of integrity in respect of the game of tennis and of the ITF
Monitor and research	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> monitor how the game is played and the ways it is evolving to improve player experience assess and improve the effectiveness of our programmes and funding schemes undertake research to improve player performance and decrease the incidence of injury undertake research to improve tennis facilities, resources and equipment such as tennis courts, rackets and methods of umpiring
Other business interests	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> promote the ITF’s development programmes through online and traditional media monitor use of, improve and protect our websites and online services both online and offline update, consolidate and improve our business and the services that we provide to you as well as the accuracy of our records and to enable us to identify our users, members and service beneficiaries identify other products and services you may be interested in and telling you about other products and services obtain your feedback and respond to and rectify complaints received by you and other users, members and service beneficiaries of the ITF analyse your personal data to make sure that you only receive information that is relevant to you develop and improve our federation and facilitate investment in, and the growth of, our business manage and mitigate the risks to you and our federation
Comply with our legal and regulatory obligations and codes of practice	<p>We may use your personal data to monitor, prevent, investigate and/or report fraud, misrepresentation, security incidents or crime, in accordance with applicable laws</p>
Investigate and respond to complaints, disputes and where necessary to bring or defend legal claims	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> identify and record facts and evidence investigate and respond to complaints, disputes, regulatory investigations and/or to bring or defend legal claims
Legal Obligations	
Compliance with applicable laws	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> comply with applicable laws and protection of the ITF’s legal rights, including, but not limited to, use in connection with legal claims, compliance with our legal obligations such as safeguarding, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation).

Consent	
	We may seek your consent to use your personal data. When we ask for your consent we will explain the reasons why. You are entitled to refuse consent. However, your refusal to provide consent may mean that we are unable to properly deliver a programme or initiative that you are participating in, or guarantee that your profile on the Athlete Management System is up-to-date and accurate.
Substantial Public Interest Reasons	
Where processing is necessary for reasons of substantial public interest	<p>We may process information about your medical history, religion, ethnic and racial background and information about any criminal convictions you have had (“Special Category Data”).</p> <p>Any Special Category Data will only be processed where it is necessary and only:</p> <ul style="list-style-type: none"> • with your prior explicit consent (which we will collect separately); or • where we are legally permitted or required to process this information without seeking your consent because it is necessary for substantial public interest, which includes: <ul style="list-style-type: none"> ○ processing in order to protect the integrity of our sport, including against fraudulent or corrupt practices (e.g. to secure a funding grant or scholarship); ○ protecting children and adults at risk against physical, mental or emotional harm, or neglect; ○ processing for the purposes of addressing non-compliance with the regulations applicable to our competitions;

Where we have obtained your consent to processing your personal data (including special category data), you are entitled to withdraw your consent to this at any time. Please contact us if you wish to do so.

If you withdraw your consent, we will not continue to process this information for the purpose for which consent was obtained, but this will not impact the validity of any processing undertaken before you withdrew your consent.

6. How we use your personal data to make automated decisions

Sometimes we will make an automated decision on the basis of your personal data. These help to ensure that the management of our programmes are based on accurate information and is fair and efficient. The types of automated decisions we make are:

- confirm your disclosed tennis ranking for acceptance into our programmes and teams;
- to prevent you from accepting an ITF/GSPDP offer if you have unpaid fines (as per the regulations), have not completed the Tennis Integrity Protection Programme, or are otherwise prevented from participating.

These are made pursuant to the contract we have with you regarding your selection and participation in our development programmes.

You can ask us to review any automated decision that we have made taking into account any additional information you wish to provide to us.

7. Marketing

We may ask you, when you provide us with your personal data, if you are happy for us to contact you by telephone, post, email or SMS about products and services offered by us which we think may be of interest to you.

If you do not agree to this, we will not use your personal data for this purpose.

We will use your personal data to enable us to provide you with information that is most relevant to you.

If, at any time, you change your preferences and either do wish to receive such communications or wish us to stop sending you such communications you can let us know by one of the following methods:

1. email us at development@itftennis.com and we'll be happy to contact you to help change your preferences. (As this isn't a secure channel, please don't include any personal details in any emails sent to this address.)
2. click the 'Update your details' or 'Unsubscribe' link on any marketing emails that we send you.

We may also use your personal data to conduct market research, which does not require your consent. However, we will respect your marketing preferences where any market research is combined with promotional content.

8. Who we share your personal data with

Your personal data may be shared with ITF Limited, registered in the Bahamas. Hosting and storage of your personal data takes place at the ITF's secure data storage facilities in Roehampton and Slough (United Kingdom), and also on our Hosted Service Provider platforms (Microsoft's Office 365 and Azure cloud hosting platforms). All data is stored in the UK or European Union.

We share your personal data with:

- you and your representatives and agents;
- any person you ask us to provide information to;
- organisations engaged in the process of making or receiving payments on our or your behalf (including WorldPay);
- National Associations and Regional Associations;
- the other tennis governing bodies – ATP, WTA, the Grand Slam Board, Tennis Australia, French Tennis Federation, Wimbledon, and US Tennis Association;
- other anti-doping organisations, such as the World Anti-Doping Association, your national anti-doping organisation and our appointed anti-doping service provider;
- the International Olympic Committee and International Paralympic Committee;
- development officers, training centre staff, tutors and coaches involved in a programme you are taking part in;
- physiotherapists or other medical practitioners assigned by the ITF to assess you;

- sports disciplinary bodies that have responsibility under the regulations to hear cases and appeals, including the Independent Tribunal (run by Sport Resolutions UK) and the Court of Arbitration for Sport;
- courts and any arbitrator or adjudicator of a dispute involving us;
- law enforcement agencies; and
- our advisers, auditors, agents, and service suppliers (e.g. travel agents) who act or may act on our behalf.

Some of these third parties will act as a processor on behalf of the ITF, and only on our instruction. Others will be a separate data controller in respect of that personal data, and will process your personal data in accordance with the applicable data protection laws relevant to that organisation.

Personal data may be shared with government authorities and/or law enforcement officials if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

9. How long we will hold your data

We will hold information about you only for as long as we need it for the purpose for which we collected it, which is as follows:

- we will retain and process information about you:
 - For the duration of your participation in one of our programmes or initiatives. We will stop processing your personal data when you stop participating or when the programme concludes and we have completed our administrative processes for that programme, whichever is later.
 - as long as you log onto our websites, platforms or online portals or use our services (including engaging with emails, registering for ITF events, making purchases or downloading content) we will keep your personal data for a reasonable period from the date you cease to have an account, login credentials or association with us.
- we will only keep passport details for as long as is necessary to confirm your age and eligibility for a grant or position within a programme.
- we will only keep your payment preferences for as long as is necessary to process a payment. This means that we will ask for your payment details each time a payment needs to be processed for you.
- where you have consented to us using your data for direct marketing purposes, we will process the data while you continue to engage with our emails, and for a period of 6 months from when you stop. If you ask us to stop processing your data for this purpose, we will keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in the future.

We may retain the data for longer where it is necessary for us to meet our legal and regulatory obligations. For example, personal data linked to disciplinary cases under applicable regulations, subject access requests, disputes, or safeguarding investigations will be kept for as long as it is necessary for those purposes, as each is applicable.

We also retain results of your performance in our programmes and competitions as part of our historical records of the sport. We may use this information for research in to the game, or promotional or editorial purposes. Publication of any research or promotional material will be anonymised.

10. Your legal rights

You have a number of rights over your personal data processed by us. These include:

- access to, and correction of, incomplete, inaccurate or outdated personal data
- transmission of personal data to you or to another person or organisation
- erasure of personal data
- restriction to our processing of your personal data
- objection to processing personal data

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

The extent of these rights are limited by law and we may not act on part or all of your request(s) where the right(s) are not applicable. If we do not act on your request, we will explain our reasons why.

Please contact us through our Data Protection Officer if you require any further information or wish to make a request to exercise any of your rights under applicable Data Protection laws.

In most cases we will respond to your request within one month.

11. Sending your personal data outside the UK and the EEA

We may transfer and your data may be processed outside the United Kingdom (UK) and the European Economic Area (EEA). This includes:

- National Associations or Regional Associations or tournaments outside the EEA if you have entered a tournament or development programme taking place in that nation or region, or are otherwise associated with them;
- the ATP, WTA, USTA and Tennis Australia; and
- coaches based outside the EEA.

Where we transfer your data outside of the EEA, we will create and maintain appropriate safeguards so that your personal data is subject to the same standards and protections as when we are processing your personal information inside the EEA.

You can contact us for more information about this.

12. How to complain

Please contact us using the contact details in the “About Us” section above if you are unhappy with the outcome of any of your requests to exercise your rights, or how we handle your personal data. You are also entitled to complain to the Information Commissioner’s Office via www.ico.org.uk.

13. Our Privacy Notice available in other formats

This Privacy Notice may be translated in to French and Spanish upon request and can be displayed in large print, Braille and audio also upon request.

APPENDIX A
JUNIOR TENNIS INITIATIVE (“JTI”)

Limited Processing

The personal data that the ITF processes in relation to ITF Junior Tennis Initiative, in particular the national development pathway players, is limited.

If you are a national development pathway player (a player involved within the National Tennis Association’s performance programme and is a nationally ranked at either 12 and / or 14-and-under) participating the respective National Association’s JTI, we will only process basic personal data about you, including your full name, gender, date of birth, nationality, ITF Tennis ID, ITF World Tennis Number (singles and doubles) and confidence level for ITF World Tennis Number (singles and doubles).

We may use your personal data for the following purposes:

Enable our business and pursue our legitimate interests or those of a third party	
Manage our development programmes	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> • organise, facilitate and promote our <u>development</u> player initiatives and related events • ensure that you receive the best training and education opportunities to develop your tennis game • provide accurate information to your National and/or Regional Association
Develop the game	<p>We may use your personal data to develop tennis as a global sport and encourage participation in your country and globally</p>
Monitor and research	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> • monitor playing career progress and future engagement within ITF activities, <u>services , tours and events</u> • monitor how the game is played and the ways it is evolving to improve player experience • assess and improve the effectiveness of our programmes and funding schemes • undertake research to improve player performance and decrease the incidence of injury • undertake research to improve tennis facilities, resources and equipment such as tennis courts, rackets and methods of umpiring

We will share your personal data with your respective National and or Regional Association as well as our coaches and contractors appointed to facilitate the delivery of the respective national JTI that you participate in.

We may transfer, and your data may be processed outside the United Kingdom (UK) and the European Economic Area (EEA) if you participate in a JTI taking place in a non-EEA nation.

We will hold your personal data for a period of two years after you complete a JTI.

Please contact us using the contact details in the “About Us” section above if you require any further information or wish to exercise any of your rights. You are also entitled to complain to the Information Commissioner’s Office via www.ico.org.uk.

APPENDIX B
ITF Tennis Festivals

Limited Processing

The personal data that the ITF processes in relation to individuals and school/group points of contact who register for an ITF Tennis Festival, via the ITF Tennis Festivals App is limited.

What information do we collect

We collect and process personal data about you when you register your participation during an organised Tennis Festival or event (the “Festival”) which is created and managed through the ITF Tennis Festivals App (the “App”). Each Festival organised through the App is under the supervision and guidance of the respective National Tennis Association (the “NA”) in the country. Personal data will be collated through the App, powered by the ITF’s software provider, Clubspark Group Limited (“ClubSpark”).

We will collect personal data about you during your participation in a Festival. This personal data may include:

- individuals 18 years and older: full name (first name and family name/surname), gender, email address and phone number, nationality, date of birth and tennis playing history.
- individual under 18 years: your full name (first name and family name/surname), gender and date of birth (to be inputted by the individual’s parent or legal guardian).
- schools (teacher/group leader): school name, school address, teacher/group leader name, gender, email address and telephone number.

Not all above fields are required in order to participate in a Festival. Participation can be anonymous.

How do we use this information, and what is the legal basis for this use?

To pursue our legitimate business interest and the business interest of the National Tennis Association delivering the Festival	<p>Those interests include:</p> <ul style="list-style-type: none"> • monitor expected attendance at ITF Festivals and research the impact of the ITF Festivals globally; and • to understand participation and retention rates of tennis players in grassroots tennis events; • to protect our legal rights.
Consent	<p>We seek your consent to use your personal data:</p> <ul style="list-style-type: none"> • to monitor whether you still participate in tennis after participation in the Festival; and • to send you a follow up email within 12- and 24- months of the Festival you participated in to ask about your on-going participation in tennis and invite you to take part in feedback questionnaires;

	<ul style="list-style-type: none"> • in the case of schools: <ul style="list-style-type: none"> - to monitor whether your school still participates in tennis after participation the Festival; - to conduct research whether your school is interested in establishing a school tennis programme; - to send you a follow up email within 12- and 24- months of the Festival your school participated in to ask about your schools on-going participation in tennis and invite you to take part in feedback questionnaires; • to respond to any comments or complaints you may send us; • to monitor use of the App; • to improve the user experience of the App and to protect the App. <p>You are entitled to refuse consent. Your refusal to provide consent means that you can still participate in the Festival, however, your attendance will be classified as an anonymous participant. If you withdraw your consent, we will not continue to process your information for the purpose for which consent was obtained, but this will not impact the validity of any processing undertaken before you withdrew your consent.</p>
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Who will we share this data with, and when?

- We will share your personal data with the respective NA delivering the Festival so that it may conduct research related to the impact of the Festival.
- Personal data may be shared with government authorities and/or law enforcement officials if required by law or if required for the legal protection of the ITF’s legitimate interests.
- Your personal data will be stored on the ITF Partner Portal platform. This platform is provided and serviced by Clubspark. Clubspark will process your personal data on our behalf, and only in accordance with our instructions.

How long will you retain my data?

- We will keep your personal data for a period of two (2) years after the conclusion of the Festival. Laws may require the ITF to hold certain information for specific periods. In other cases, The ITF may also retain data for an appropriate period after any relationship with you ends to protect itself from legal claims, or to administer its business.

Where will you send my data?

- We will only send your personal data outside the European Economic Area (the “EEA”) if the National Tennis Association that delivers the ITF Tennis Festival that you participate in is based outside the EEA.
- Where information is transferred outside the EEA, and where this is to a National Tennis Association in a country that is not subject to an adequacy decision by the European Union Commission, we will ensure that appropriate data protection mechanisms are in place to comply with the requirements of GDPR.

Privacy Notice – Players in ITF/GSPDP Development programmes
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