

1 January 2021

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ITF Privacy Notice – Athlete Management System users

Note: This Privacy Notice only applies to users of the ITF Athlete Management System. Please refer to the ITF's privacy notice homepage here for other privacy notices that may apply to you.

Please read this notice carefully.

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.

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

2. Who this privacy notice applies to

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

- accesses and uses the Athlete Management System through a secure login, including (but not limited to):
 - tennis players and their nominated data importers (coaches, legal guardians, private doctors)
 - ITF appointed coaches;
 - ITF appointed medical practitioners (physiotherapists, doctors)
 - ITF appointed classification personnel
 - other end users (ITF administrators, National Association representatives, Training Centre staff)

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 for and use the Athlete Management System (AMS);
- log in to your secure AMS account to enter information about you and your tennis;
- log in to a secure AMS account that you have been given access to, to enter information about a player and their tennis.





We may also obtain data about you:

- from our database which is linked to your IPIN account.
- from authorised AMS end users who enter data on behalf of or about you (for example from Classification Personnel, ITF appointed coaches and/or doctors);
- from other organisations, including the International Tennis Integrity Agency, 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 other Anti-Doping Organisations (such as the World Anti-Doping Agency, National Anti-Doping Agencies and Major Event Organisers), any ITF-appointed service provider or other regulatory bodies as part of our role and responsibilities under the Tennis Anti-Doping Programme and the World Anti-Doping Code;
- from player analysis technology suppliers such as Hawk-Eye in relation to your participation in our competitions;
- when we ask you to complete optional surveys that we use for research purposes into the game of tennis and the AMS; and
- when you digitally interact with the AMS.

4. The types of personal data we process

4.1 Players

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

personal details	 full name gender contact telephone number residential address email address date of birth height and weight nationality unique identifier code
documentation completed by you	 pre and post tour reports post tour questionnaire executed documents for: Code of Conduct Anti-Doping Anti-Corruption
other information identifying you	AMS username and password
your playing information	 activity and results in our competitions, and other tennis competitions that you participate in such as national/regional competitions, the ATP tour, WTA tour, and the Grand Slams ranking (ATP, WTA, ITF, regional and national) tennis biography details such as when you started playing tennis, preferred surface and playing hand/doubles hand fitness testing components and training load



	 recorded footage of training and performance in competition performance goals, and development plan recorded by you
your Performance Analysis (PAT) Data	 performance analysis data from tennis matches played by you and recorded by our third-party data suppliers for sporting reasons performance analysis data from testing and screening (fitness, psychological, medical and physiological)
your compliance with our regulations	 information relating to your compliance with the Tennis Anti-Doping Programme, further specified in privacy notices included on doping control forms, the ADAMS system, and the TUE portal
your preferences	 whether you wish to receive marketing from us and which types of marketing material you would like to receive
your technology	 device identifiers including IP address and information on how you access and use the AMS, for example via smart phone application cookies usage
your medical information	 details that you provide us through the AMS about your health, medical history (including impairment information for wheelchair tennis players), injury record (for example, medical registration form) and your racial and ethnic background.

4.2 <u>Coaches, Medical Practitioners, Legal Guardians, Classification Personnel, Other End Users</u> We will only process a limited amount of personal data about you, including personal data about

personal details	 full name residential address (if necessary) contact telephone number email address date of birth (legal guardians only) 		
other information identifying you	AMS username and password		
your technology	 device identifiers including IP address and information on howyou access and use the AMS, for example via smart phone application cookies 		

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

Legal Basis	Purpose	Data Subject	
Performance of our contract with you			
Fulfil the contract of service that you enter into with us regarding your use of the AMS	 We may use your personal data to: verify your identity, address and other information provided to us about you, including (where applicable) your User permissions to access and use the AMS on behalf of the account holder set up your account and authenticate your registration take steps in accordance with or linked to fulfilling our contractual obligations to provide you with the AMS 	Player Coach Medical Practitioner Legal Guardian Classification Personnel Other End Users	





	communicate with you	
Fnable our busi	ness and pursue our legitimate interests or those of a th	ird party
Monitor and research Manage our	 We may use your personal data to: monitor how the game is played evaluate player performance assess the incidence of injury and illness in tennis develop, improve and maintain the ITF World Tennis Number undertake research to improve tennis-specific technologies (for example: recovery and injury prevention programmes; performance trajectory software; scoring methods) gather statistics about participation and performance We may use your personal data to assess player 	Player
competitions	eligibility to compete in ITF tournaments or events	Classification Personnel
and tournaments	(for example: pursuant to wheelchair tennis player evaluations).	
Regulate and protect the integrity of the game	 We may use your personal data to: ensure your adherence to the rules, regulations and codes of conduct that apply to you investigate and resolve any disciplinary issues or potential breaches of our Rules and Regulations and Codes of Conduct that you may be involved in uphold the highest stands of integrity in respect of the game of tennis and of the ITF 	Player Coach Medical Practitioner Legal Guardian Classification Personnel Other End Users
Other business interests	 We may use your personal data to: monitor use of, improve and protect our websites and online services both online and offline update, consolidate and improve our business and the AMS obtain your feedback and respond to and rectify complaints received by you and other AMS users 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 	Player Coach Medical Practitioner Legal Guardian Classification Personnel Other End Users
Comply with our legal and regulatory obligations and codes of practice Legal Obligation	We may use your personal data to monitor, prevent, investigate and/or report fraud, misrepresentation, security incidents or crime, in accordance with applicable laws	Player Coach Medical Practitioner Legal Guardian Classification Personnel Other End Users
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Compliance with applicable laws	We may use your personal data to comply with applicable laws and protect of the ITF's legal rights, including, but not limited to, use in connection with legal claims, compliance with our legal obligations	Player Coach Medical Practitioner Legal Guardian







	such as safeguarding, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation).	Classification Personnel Other End Users
Consent		
	We may seek your consent to use your personal data for other purposes. When we ask for you 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 provide you with full use of the AMS.	Player Coach Medical Practitioner Legal Guardian Classification Personnel Other End Users
Substantial Publ	lic Interest Reasons	
	We may process information about your medical history, ethnic and racial background ("Special Category Data"). Any Special Category Data will only be processed where it is necessary and only:	Player Legal Guardian (only if necessary to verify familial connection to a player)
	 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; and it is necessary for substantial public interest, which includes: processing for the purposes of our Tennis Anti-Doping Programme which is designed to eliminate, identify and prevent doping, and to provide information about doping or suspected doping where necessary; processing for the purposes of the Tennis Anti-Corruption Programme and any other integrity rules, measures or practices which are aimed at protecting the integrity of tennis from dishonesty, malpractice or other seriously improper conduct; and processing in order to protect the integrity of our sport, including against fraudulent or corrupt practices, and ensuring a level playing field between participants (e.g. classification for wheelchair tennis players); protecting children and adults at risk against physical, mental or emotional harm, or neglect; processing for the purposes of addressing noncompliance with the regulations applicable to our competitions By registering for and entering personal information on the AMS about your training and performance, 	
	on the AMS about your training and performance, incidence of injury and general health as a tennis	



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player (Special Category Data), you consent to the ITF	
processing that information for you and running data	
reports based on that information	

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 – Players only

We may make an automated decision on the basis of your personal data to determine your ITF World Tennis Number;

This automated decision is made pursuant to your explicit consent to have an ITF World Tennis Number.

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. 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 our data processor's (Fusion Sport Europe Ltd) secure data storage facilities in Ireland (EEA).

We may share your personal data with:

- Fusion Sport Europe Ltd who is our software provider for the AMS;
- Other End Users that are instructed to import data for and/or about you;
- any person you ask us to provide any AMS information to;
- National Associations and Regional Associations that have access to the AMS;
- the International Olympic Committee and International Paralympic Committee (as appropriate);
- the other tennis governing bodies ATP, WTA, the Grand Slam Board, Tennis Australia, Fédération Française de Tennis, AELTC, and US Tennis Association;
- other anti-doping organisations, such as the World Anti-Doping Association, your national antidoping organisation and our appointed anti-doping service provider;
- sports disciplinary bodies that have responsibility under the regulations to hear cases and appeals, including the International Tennis Integrity Agency, the Independent Tribunal (run by Sport Resolutions UK) and the Court of Arbitration for Sport;
- our advisers, auditors, agents and suppliers 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.

8. 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:

Trigger Event – deactivation of AMS account

Data Subject	Personal Details	Documentation	Performance and Playing Data	Special Category Data
Player	3 years	7 years	7 years + height, weight and year of birth	7 years
Legal Guardians	3 years	3 years		
Coaches	3 years	3 years		
Medical Practitioners	3 years	7 years		
Classification Personnel	3 years	7 years		
Other End Users	3 years	3 years		

We may retain certain personal 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 may retain your Special Category Data for longer than seven years for sporting research and to gather statistics about the game, for example player performance patterns, tracking incidence of injury, and assessing athlete impairment against performance. Where we keep your Special Category Data for research purposes for longer than seven years, we will anonymise that data.

9. 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.



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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.

10. 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:

- Classification Personnel (Wheelchair) based and conducting testing outside the EEA;
- The IOC, IPC, ATP, WTA, USTA and Tennis Australia;
- Regional Associations (COTECC, COSAT, OTF, ATF, CAT);
- World Anti-Doping Agency and International Tennis Integrity Agency, if operating outside the EEA.

Where we transfer your data outside of the EEA, in countries that do not have an Adequacy Decision, 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.

11. 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.

12.Our Privacy Notice available in other formats

We may provide this Privacy Notice translated in to French and Spanish or in large print, Braille and audio upon request.