

## ITF Privacy Notice – Players participating in ITF competitions

*Note: This Privacy Notice does not apply to the Davis Cup, Billie Jean King Cup, Olympic and/or Paralympic 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 will endeavour to inform you of any substantial changes to our processing of your personal data. 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	<a href="mailto:dataprotectionofficer@itftennis.com">dataprotectionofficer@itftennis.com</a>

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:

- applies for, or has a registered IPIN account with us;
- enters into and/or participates in any ITF circuit or event which is managed, controlled, owned or sanctioned by the ITF (excluding the Davis Cup, Fed Cup, Olympics and Paralympics);

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 obtain an IPIN and/or use our online services including to manage your IPIN account;
- enter, and then participate in tournaments and events sanctioned, managed, owned or controlled by the ITF;
- submit information to enable the ITF to assess your eligibility to participate in an ITF tennis event (e.g. wheelchair classification, national eligibility);
- register for and then undertake online learning courses and training programmes such as ITF Education;
- register for and use the ITF Athlete Management System;
- communicate with us in relation to your IPIN membership, participation in tournaments and events, such as making enquiries, and submitting Code of Conduct appeals;
- subscribe to our communications and marketing material;

We may also obtain data about you:

- that is publicly available, such as information from media, websites, and your social media accounts;
- from your ITF World Tennis Number profile (if you have one);
- 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 officials, other participants of competitions, members of the public, or other regulatory organisations, who write to us in relation to you or who we contact in relation to investigations or other enquiries;
- from tournament medical staff, if you have been treated on-site and need to submit a medical withdrawal, and from the ITF’s physiotherapists;
- from the International Tennis Integrity Agency, formerly the Tennis Integrity Unit, any ITF-appointed service provider or other regulatory bodies 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 illegal betting and other corrupt conduct, safeguarding issues, or other matters prohibited under the regulations applicable to a competition which you participate in;
- 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 technology suppliers such as HawkEye in relation to your participation in our competitions;
- 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 ITFUNO and the resources that you access which may include the use of cookies (subject to our Cookie policy).

#### 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	• full name and title
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	<ul style="list-style-type: none"> <li>• email address, home address and telephone numbers</li> <li>• gender</li> <li>• date of birth</li> <li>• nationality and country of residence</li> <li>• your image</li> <li>• language spoken</li> <li>• passport details and/or residency cards to verify your nationality or age</li> <li>• for children under 18yrs, information about your parents or guardians</li> </ul>
your financial details (if applicable)	although not held by the ITF, through our financial online payment provider, your bank account <u>or credit card</u> details when you provide these to us for <u>processing payments</u> .
other information identifying you	<ul style="list-style-type: none"> <li>• password, memorable data, <u>and</u> secret questions and answers.</li> </ul>
your playing information	<ul style="list-style-type: none"> <li>• activity and results in our competitions, and other international tennis competitions such as the ATP tour, WTA tour, and the grand slams</li> <li>• ranking (ATP, WTA, ITF and national)</li> <li>• if applicable, your ITF World Tennis Number and related match results</li> <li>• tennis biography details such as when you started playing tennis, preferred surface, playing hand/doubles hand, and favourite player</li> <li>• any other information you provide us for your tennis player profile</li> </ul>
your Performance Analysis (PAT) Data	<ul style="list-style-type: none"> <li>• performance analysis data from tennis matches played by you and recorded by our third party data suppliers for sporting reasons</li> </ul>
your compliance with our regulations	<ul style="list-style-type: none"> <li>• information relating to potential or actual Code of Conduct violations</li> <li>• 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</li> <li>• information relating to your compliance with the Tennis Anti-Corruption Program</li> <li>• information that you provide in response to enquiries or investigations under relevant regulations</li> </ul>
your preferences	<ul style="list-style-type: none"> <li>• whether you wish to receive marketing from us and which types of marketing material you would like to receive</li> </ul>
your technology	<ul style="list-style-type: none"> <li>• device identifiers including IP address</li> </ul>
your profile and how you use our products and services	<ul style="list-style-type: none"> <li>• details of our services with you, including how you access and use those services, for example via smart phone application, web browser etc</li> <li>• cookies</li> </ul>
your correspondence	<ul style="list-style-type: none"> <li>• information contained in any correspondence, or communications received or sent by you.</li> </ul>
your medical information	<ul style="list-style-type: none"> <li>• details (if any) about your health and medical history as well as your racial and ethnic background that you provide to us or that we receive from the ITF physiotherapists through the Athlete Management System.</li> </ul>
your criminal history	<ul style="list-style-type: none"> <li>• details (if any) about the potential or actual commission of a criminal offence by you.</li> </ul>

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

Performance of our contract with you
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<p><b>Fulfil the contract of service that you enter into with us (e.g. when you register for IPIN or enter competitions subject to the regulations)</b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• verify your identity, set up your account and authenticate your registration when you register with us</li> <li>• receive and manage payments made for IPIN <u>and</u> tournament entries and fines</li> <li>• take steps in accordance with or linked to fulfilling our contractual obligations to provide you with IPIN <u>services</u>, and to administer your entry into and participation in circuit events (or your withdrawal)</li> <li>• if you 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</li> <li>• communicate with you</li> </ul>
<p><b>Enable our business and pursue our legitimate interests or those of a third party</b></p>	
<p><b>Manage competitions and tournaments, and assist in the facilitation of regional and national tournaments</b></p>	<p>We will use your personal data to:</p> <ul style="list-style-type: none"> <li>• organise, facilitate <u>and promote</u> our competitions, tournaments and events</li> <li>• <u>process accreditation requests from you for ITF tournaments</u></li> <li>• facilitate your participation in national or regional competitions</li> <li>• provide accurate information to your National Association and the other tennis governing bodies, including each of the Grand Slams including your ITF ranking, WTN ranking, email address, nationality, DOB</li> </ul>
<p><b>Develop the game</b></p>	<p>We may use your personal data to develop tennis as a global sport and encourage participation</p>
<p><b>Regulate and protect the integrity of the game</b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• ensure your adherence to the rules, regulations and codes of conduct that apply to the competitions that you are playing in</li> <li>• investigate and resolve any disciplinary issues or potential breaches of our Rules and Regulations and Codes of Conduct that you may be involved in</li> <li>• uphold the highest stands of integrity in respect of the game of tennis and of the ITF</li> </ul>
<p><b>Monitor and research</b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• monitor how the game is played and the ways it is evolving to improve player experience</li> <li>• undertake research to improve player performance and decrease the incidence of injury</li> <li>• undertake research to enhance the general appeal and global reach of the game</li> <li>• undertake research to improve tennis facilities, resources and equipment such as tennis courts, rackets and methods of umpiring</li> <li>• gather statistics about registration, memberships, accreditation and people interested in tennis</li> </ul>
<p><b>Commercial use of match and player information</b></p>	<p>We may use your personal data to sell or license to third parties, or otherwise permit third party use of, information relating to:</p> <ul style="list-style-type: none"> <li>• our competitions, tournaments and events (including photographs, footage, match statistics and results, and player</li> </ul>

	<p>biographies) for commercial purposes (such as creating editorial content or betting markets)</p> <ul style="list-style-type: none"> <li>• your IPIN membership, for the purpose of providing you partner benefits (e.g. discounts on products from TennisPoint)</li> </ul>
<b>Delivery of the ITF World Tennis Number</b>	We may use your personal data to feed into and maintain the integrity of the algorithm that generates the ITF World Tennis Number project.
<b>Other business interests</b>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• <u>publish and maintain on the ITF website, your ITF Player Profile which records your basic biographical information (name, age and nationality) and tennis record</u></li> <li>• update, consolidate and improve our business, <u>websites</u> and the services that we provide to you as well as the accuracy of our records</li> <li>• monitor the use of your account / membership with us, link together your different accounts with us, <u>and tailor communications to your tennis preferences and</u></li> <li>• obtain your feedback and respond to and rectify complaints received by you <u>or about you</u></li> <li>• develop and improve our federation and facilitate investment in, and the growth of, our business.</li> </ul>
<b>Comply with our legal and regulatory obligations and codes of practice</b>	We may use your personal data to monitor, prevent, investigate and/or report <u>non-compliance with ITF rules and regulations or other regulations and codes of conduct.</u>
<b>Investigate and respond to complaints, disputes and where necessary to bring or defend legal claims</b>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• identify and record facts and evidence</li> <li>• investigate and respond to complaints, disputes, regulatory investigations and/or to bring or defend legal claims</li> </ul>
<b>Legal Obligations</b>	
<b>Compliance with applicable laws</b>	We may use your personal data to comply with applicable laws and protection of the ITF's legitimate business interests and legal rights, including, but not limited to safeguarding, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation).
<b>Consent</b>	
	<p>We may seek your consent to use your personal data. 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 the service that you have requested, accept your application for an IPIN, manage your profile on the Athlete Management System or manage your participation in ITF tournaments and competitions.</p> <p>Where we have relied on your consent to process 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</p>

	for the purpose for which consent was obtained, but this will not impact the validity of any processing undertaken before you withdrew your consent.
<b>Substantial Public Interest Reasons</b>	
<b>Where processing is necessary for reasons of substantial public interest</b>	<p>We may process information about your medical history, ethnic and racial background and information about any criminal convictions you have had (“Special Category Data”).</p> <p><b>Any Special Category Data will only be processed where it is necessary and only:</b></p> <ul style="list-style-type: none"> <li>• with your prior explicit consent (which we will collect separately); or</li> <li>• 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"> <li>○ 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;</li> <li>○ 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</li> <li>○ 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);</li> <li>○ protecting children and adults at risk against physical, mental or emotional harm, or neglect.</li> </ul> </li> </ul>

Where we process your personal data on the basis of legitimate interests, you can request a copy of the balancing test for that data processing using the contact details set out at the beginning of this notice.

## 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 competitions is quick, fair and efficient. The types of automated decisions we make are:

- to calculate your ranking and determine entry into tournaments;
- to prevent you from entering a tournament if you have unpaid fines (as per the regulations), have not completed the Tennis Integrity Protection Programme, or are otherwise prevented from entering.

These are made pursuant to the contract we have with you regarding your IPIN registration and compliance with the applicable circuit regulations.

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. log in to your IPIN account and check or uncheck the communication preferences options under the heading 'Personal Details' in the 'My Profile' section.
2. email us at [dataprotectionofficer@itftennis.com](mailto:dataprotectionofficer@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.)
3. click the 'Update your details' or 'Unsubscribe' link on any marketing emails that we send you.

## 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 and other persons you ask us to share your data with;
- organisations engaged in the process of making or receiving payments on our 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;
- 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;
- Tournament Organisers and officials;
- 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 sports data partners (including SportRadar) for commercial use (such as creating editorial content, or betting markets);
- our commercial partners (including TennisPoint and OFX) for commercial use (such as offering you discounts on tennis-related products) if you consent to receive information from ITF partners;

- our platform services providers that deliver ITF initiatives, e.g the ITF World Tennis Number (by Clubspark) and ITFUNO (by Crionet);
- other players who request access to their player analysis technology (PAT) data but only if your personal and/or PAT data is bundled with that data. Please note that we do not hold this data but rather instruct our sports data partner (Hawkeye) to provide the PAT data requested directly to the player; and
- 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, courts, arbitrators and/or law enforcement agencies 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 as long as you continue to hold an active IPIN membership or play in our circuits, participate in our competitions, log onto our websites, platforms or online portals or use our services (including engaging with emails, entering tournaments, 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 membership with us.
- 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 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 participation in our competitions indefinitely, as historical records of the sport. We may publish this information publicly online, use this for research in to the game, or share it with 3<sup>rd</sup> parties as outline above. Any special category data that we retain for research purposes shall be anonymised so that you are not identifiable, otherwise we shall seek your consent to retain and use your personal data for research purposes.

### 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 or EU Representative 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 taking place in that nation or region, or are otherwise associated with them;
- the ATP, WTA, USTA and Tennis Australia;
- the International Tennis Integrity Agency; and
- World Anti-Doping Agency.

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](http://www.ico.org.uk).

### **13. Our Privacy Notice available in other formats**

We provide our Privacy Notice translated in to French and Spanish. We can provide our Privacy Notice in large print, Braille and audio upon request.