





ITF Privacy Notice – Participants in the Olympic and Paralympic Games

Note: This Privacy Notice does not apply to a player's participation on any ITF circuit or in the Davis Cup or Fed Cup. Those competitions have their own privacy notice which can be found on the ITF website at www.itftennis.com in the "Privacy Notices" section.

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 plays in, or is nominated to play in a tennis event (the "Tournament") of the Olympic Games or Paralympic Games (the "Event").

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:

- are nominated and then participate in the Tournament;
- submit information to enable the ITF to assess your eligibility to participate in the Tournament (e.g. national status, age, impairment); and
- communicate with us in relation to your participation in the Tournament, such as making enquiries, and submitting Code of Conduct appeals.

We may also obtain data about you:

• that is publicly available, such as information from media, websites, and your social media accounts;



- from your national / regional association or other nominating body (e.g. National Olympic or Paralympic Committee), as part of our organisation and regulation of the Tournament;
- from the organisers of the Event, or their designees and any associated multi-sports governing body or major event organisers to ensure the Tournament is properly managed and your participation is approved;
- 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 in the Tournament, 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 the Tournament/Event medical staff, if you have been treated on site and need to submit medical information;
- from the <u>International Tennis Integrity Agency</u>, 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 in the Tournament/Event;
- 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 electronic line calling providers and live scoring providers in relation to your participation in the Tournament; and
- when we ask you to engage with us for example for research purposes and to provide you with a more relevant player experience.

4. The types of personal data we process

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

you as an individual	 full name, title and tennis identifying number email address, and telephone numbers gender date of birth nationality country of residence language spoken physical appearance (photography and videography) passport details and/or residency cards to verify your nationality or age for players under 18yrs, the name, contact and residency details of your parents
your playing information	 activity and results in the Tournament, and other international tennis competitions such as the ITF tours, ATP tour, WTA tour, and the Grand Slams ranking (ATP, WTA, ITF, WTN and national)



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	 tennis biography details such as when you started playing tennis, preferred surface, playing hand/doubles hand, head to head records, your performances representing your country, win/loss record in the Tournament any other information you provide us for your tennis biography
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
your compliance with our regulations	 information relating to potential or actual Code of Conduct violations 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 information relating to your compliance with the Tennis Anti-Corruption Program information that you provide in response to enquiries or investigations under relevant regulations
your correspondence	 information contained in any correspondence, or communications received or sent by you or on behalf of you by your national / regional association or other membership body.
your sensitive information	 details (if any) about your health and medical history that you provide to us, or that we collect about you during the Event, including injuries and illnesses details of your racial and ethnic background that you provide to us regarding your national / team eligibility
your criminal history	 details (if any) about the potential or actual commission of a criminal offence by 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 services you have with us regarding your nomination for and participation in the Tournament subject to the relevant Tournament and/or Event regulations)	 we may use your personal data to: verify your identity, address and other information provided to us about you take steps in accordance with or linked to fulfilling our obligations to deliver the Tournament, and to administer your nomination, entry and participation in and attendance at that Tournament (or your withdrawal) assess your eligibility to enter the Tournament and represent your national team communicate with you.
Enable our business and pursue our legitimate interests or those of a third party	
Manage and facilitate the successful delivery of the Tournament and the Event	 We will use your personal data to: organise and facilitate the Tournament and our involvement in the Event, which includes enabling our nominated licensees (if any) to organise and facilitate the Tournament; and enabling the Event organisers to administer the Event (for example qualification and accreditation) promote the Tournament, which includes:



	 permitting broadcasters to display player analysis (PAT) data and stroke/in-match data in their broadcasts; providing spectators a better fan experience by displaying PAT data and stroke/in-match of players on in-stadium screens; facilitate your team's nomination process to enable you to participate in the Tournament take steps in relation to our contractual obligations with your national association and/or the Event organisers, for your and your team's benefit in respect of the Tournament and/or Event provide accurate information to your national/regional association and the other tennis governing bodies, including your
	 ITF ranking (if applicable), email address, nationality and DOB monitor your participation in, or withdrawal from the Tournament and the reasons for any withdrawal, for the purpose of assessing your eligibility for any other relevant ITF or multisport events.
Develop of the game	We may use your personal data to develop tennis as a global sport and
Regulate and protect the integrity of the game	 encourage participation. We may use your personal data to: ensure your adherence to the rules, regulations and codes of conduct that apply to the Tournament, the Event and the ITF and conduct disciplinary activities for any alleged breach of those rules uphold the highest stands of integrity in respect of the game of tennis and of the ITF.
Monitor and research	 We may use your personal data to: monitor how the game is played and the ways it is evolving to improve player experience undertake research in a variety of areas including (but not limited to):
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 services that we provide to you as well as the accuracy of our records 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	We may use your personal data to monitor, prevent, investigate and/or report fraud, misrepresentation, security incidents or crime, in accordance with applicable laws
Investigate and respond to complaints, disputes and where necessary to bring or defend legal claims	We may use your personal data to: 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	We may use your personal data to comply with applicable laws and protect 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	
Substantial Public Interes	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. Such services could include provision of medical treatment or approving your eligibility to play in the Tournament.
Where processing is	
necessary for reasons of substantial public interest	We may process information about your medical history, ethnic and racial background and information about any criminal convictions you have had ("Special Category Data").
interest	Any Special Category Data will only be processed where it is necessary and only:
	 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);



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C	protecting children and adults at risk against physical, mental or
	emotional harm, or neglect;
0	processing for the purposes of addressing non-compliance with
	the regulations applicable to our competitions;

Where we have obtained your consent to process your personal data (including Special Category Data), you are entitled to withdraw your consent 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.

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

We do not make automated decision on the basis of your personal data.

If we start making any automated decisions on the basis of your personal data we will inform you at the time and 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 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;
- national and regional associations;
- the organisers of the Event and their designees (e.g. Tokyo 2020 Organising Committee);
- 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, International Paralympic Committee and your national Olympic or Paralympic Committee;
- Tournament organisers, staff members and officials;
- sports disciplinary bodies that have responsibility under the regulations to hear cases and appeals, including the <u>International Tennis Integrity Agency</u>, the Independent Tribunal (run by Sport Resolutions UK) and the Court of Arbitration for Sport;







- our sports data partners (e.g. Sportradar and Hawk-eye) for commercial use and for officiating purposes (competition draws, live-scoring data, and results);
- broadcasters, sponsors and other commercial partners, for promotion and publication of the Tournament (only with the approval of the Event organisers);
- players or National Associations that request their performance data or that of their team (i.e. Hawkeye data), but only where your data is included because you were the opponent; 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 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:

• We will retain your personal data going to your tennis biography, eligibility to compete in the Tournament and any other information relevant to your participation in the Tournament for a period of six years from the date we receive notification from your national association (or you) that you have retired from tennis.

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, subject access requests, disputes, or safeguarding investigations will be kept for as long as it is necessary for those purposes.

We also retain results of your participation in the Tournament indefinitely, as this forms part of the historical records of the sport. We may publish this information publicly online, use this for research into the game, or share it with third parties as outlined above. Any Special Category Data that we retain for research purposes shall be anonymised so that you are not identifiable, otherwise we will obtain your consent.

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.



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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.

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:

- Event and Tournament organisers and staff members outside the EEA if the Tournament is taking place outside the EEA for example Tokyo, Japan;
- the ATP, WTA, USTA and Tennis Australia;
- World Anti-Doping Agency; and
- National / regional associations and Olympic committees not based in the EEA (if applicable to you).

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.

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