

## ITF Privacy Notice – ITF Business Contacts

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. 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	<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](mailto: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:

- an ITF Board, Committee or Commission member;
- a board member, executive staff member, volunteer or other personnel of a National Association or Regional Association;
- an individual Tournament Organiser or a member of that Tournament Organiser's personnel (including volunteers);
- an employee of one of our suppliers, commercial partners or any of our service providers, including, but not limited to the following sectors:
  - competition sponsors;

- media;
- technology;
- infrastructure.
- any other individual who provides the ITF with services or we otherwise engage with in a business relationship; or
- a deliverer of an ITF programme including coaches.

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

### 3. Why we are providing you with this privacy notice

Data protection laws impose obligations on us to process (e.g. collect, hold, use, share or erase) your personal data fairly, lawfully and in a transparent manner. This privacy notice explains how we do that and sets out some of your legal rights.

If we need to change this privacy notice in the future, we will inform you before those changes take effect.

### 4. How we obtain your personal data

We collect and process your data when you:

- are appointed to our Board, or one of our Committees and Commissions;
- register and participate in, work or volunteer at our events, tournaments, conferences or seminars;
- browse or register to use our online services which may include the use of cookies (subject to our Cookies policy);
- subscribe to our communications and marketing material;
- communicate with us either personally or on behalf of your employer, business or tennis association;
- register and use ITF’s online baseline system (including but not limited to for tournament management and online tournament applications);
- engage with the ITF on behalf of your employer (including but not limited to contracting for goods or services, or applying for grants or other funding);
- register and use the ITF Tennis Festivals App as a National Association representative; or
- register and use the ITF Academy as a National Association representative.

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 any regulatory organisations that write to us in relation to you or who we contact in relation to investigations or other enquiries;
- when we ask you to complete optional surveys that we use for research purposes and to provide you with a more relevant ITF experience;
- from the International Tennis Integrity Agency, formerly the Tennis Integrity Unit, Anti-Doping Organisations, and other ITF-appointed service providers or regulatory bodies as part of our role and responsibilities as the regulator of ITF competitions (when your data relates

to regulatory or criminal investigations in respect of illegal betting and other corrupt conduct, anti-doping, safeguarding issues, or other matters prohibited under the regulations applicable to the ITF and its competitions);

- when you digitally interact with the ITF via our portals and the resources that you access which may include executing declaration forms, downloading business information etc; and
- from our affiliate, Billie Jean King Cup Limited, registered in the United Kingdom.

## 5. The types of personal data we process

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

<p>You as an individual</p>	<ul style="list-style-type: none"> <li>• your full name and gender;</li> <li>• email address, home address, <u>date of birth, your image (optional) and contact number;</u></li> <li>• the name of your employer, association or entity that you represent, your position within that entity;</li> <li>• <u>your nationality;</u></li> <li>• other positions you hold that may give rise to a conflict of interest (actual or apparent);</li> <li>• gifts or hospitality that you have received in relation to your role within the ITF;</li> <li>• <u>if you are applying to be on one of our Commissions or Committees, your previous and relevant experience and your curriculum vitae;</u></li> <li>• <u>if you are engaged by a laboratory to provide tennis equipment testing services on ITF’s behalf, your qualifications, employment history and training record.</u></li> </ul>
<p>Your financial details (if applicable)</p>	<ul style="list-style-type: none"> <li>• your bank account details (name of bank, account holders, account number and sort code) when you provide these to us for the purposes of payments to you, e.g. reimbursement of expenses;</li> <li>• your 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, for example – conference registration;</li> <li>• your passport details, where we have to check your age or eligibility and/or assist with and process visa applications or travel bookings.</li> </ul>
<p>Your preferences</p>	<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>
<p>Your correspondence</p>	<ul style="list-style-type: none"> <li>• information contained in any correspondence, or communications received or sent by you.</li> </ul>
<p>Your sensitive information</p>	<ul style="list-style-type: none"> <li>• details (if any) about your health and medical history as well as your religion or racial and ethnic background that you provide to us.</li> </ul>

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

### Compliance with our contractual obligations

<p><b>To fulfil the relevant contract of service that you or your employer enters with us in respect of the provision of ITF services (<u>or any preliminary stages to entering any such contract</u>)</b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• verify your identity, address and other information provided to us about you;</li> <li>• authenticate your registration when you register with us;</li> <li>• receive and manage payments made by you in consideration for our services including using third parties to check the validity of payment details in order to prevent fraud;</li> <li>• take steps in accordance with or linked to fulfilling our contractual obligations;</li> <li>• <u>conduct our procurement processes for the provision of services, including bidding to host our competitions;</u></li> <li>• communicate with you.</li> </ul>
<p><b>Enable our business and pursue our legitimate interests</b></p>	
<p><b>Managing ITF tournaments, meetings events, conferences and seminars</b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• organise and facilitate ITF events, meetings <u>or competitions</u> that you are involved in organising or are attending, including travel and administrative arrangements;</li> <li>• <u>process accreditation requests from you for ITF tournaments; and</u></li> <li>• <u>provide tennis equipment testing services.</u></li> </ul>
<p><b>Developing the game of tennis and improving the regulation of ITF competitions</b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• improve our regulation of tournaments and competitions sanctioned, owned, managed or recognised by the ITF;</li> <li>• further develop tennis as a global sport and encourage participation;</li> <li>• monitor participation in tennis activities generally.</li> </ul>
<p><b>Regulating and protecting the integrity of the game, and comply with legal and regulatory obligations</b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• ensure adherence to the rules, regulations and codes of conduct that apply to tennis;</li> <li>• investigate and resolve any disciplinary issues or potential breaches of our Rules and Regulations, Code of Ethics and other codes that you, your employer or your Association are subject to;</li> <li>• uphold the highest stands of integrity in respect of the game of tennis and of the ITF;</li> <li>• monitor, prevent, investigate and/or report fraud, misrepresentation, security incidents or crime, in accordance with applicable laws.</li> </ul>
<p><b>Other business interests</b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• update, consolidate and improve our business and the services that we provide to you as well as the accuracy of our records;</li> <li>• identify and inform you about other products and services that you or your company/entity may be interested in;</li> <li>• obtain your feedback and respond to and rectify complaints received by you and other ITF service beneficiaries or service providers;</li> <li>• segment your personal data to make sure that you only receive information that is relevant to you as an employee, member of staff or associate of an ITF service provider or business partner;</li> </ul>

	<ul style="list-style-type: none"> <li>• develop and improve ITF business functions and facilitate investment in, and the growth of, our business;</li> <li>• manage and mitigate the risks to you and our federation;</li> <li>• protect our premises from criminal activity, and to monitor for health and safety purposes, through our CCTV system.</li> </ul>
<b>To investigate and respond to complaints, disputes and where necessary to bring or defend legal claims</b>	We may use your personal data to identify and record facts and evidence and investigate and respond to complaints, disputes, regulatory proceedings and/or to bring or defend legal claims.
<b>Legal Obligations</b>	
<b>Compliance with applicable laws</b>	We may use your personal data to comply with applicable laws i.e. criminal, safeguarding, regulatory and investigative purposes (including disclosure of personal data in connection with legal proceedings and litigation).
<b>Consent</b>	
	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, or manage your engagement with the ITF.
<b>Explicit Consent</b>	<p><u>In addition, we may process information about your medical history, ethnic and racial background and religion (“Special Category Data”).</u></p> <p><u>In most cases, we will only process this with your explicit consent, which may include situations such as:</u></p> <ul style="list-style-type: none"> <li>• <u>Ensuring accessibility of an ITF event, conference or competition;</u></li> <li>• <u>Complying with preferences in relation to attendance at an ITF event, conference or competition (e.g. dietary requirements).</u></li> </ul>
<b>Substantial Public Interest Reasons</b>	
<b>Where processing is necessary for reasons of substantial public interest</b>	<p><b><u>Special Category Data will only be processed without your explicit consent where it is necessary and only where:</u></b></p> <ul style="list-style-type: none"> <li>• we are legally permitted or required to process this information without seeking your consent; and</li> <li>• it is necessary for substantial public interest, which includes processing for these purposes: <ul style="list-style-type: none"> <li>○ anti-doping;</li> <li>○ anti-corruption and protecting the integrity of tennis from dishonesty, malpractice or other seriously improper conduct;</li> <li>○ processing in order to protect the integrity of our sport, including against fraudulent or corrupt practices;</li> <li>○ safeguarding against physical, mental or emotional harm, or neglect.</li> </ul> </li> </ul>

	<p>In addition, criminal offence data may be processed without your <u>explicit consent for the purposes described above, even if not in the substantial public interest.</u></p>
--	---

Where we have obtained your consent to processing personal 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 purposes described above, but this will not impact the validity of any processing undertaken before you withdrew your consent.

### 7. How we use your personal data to make automated decisions

We do not make automated decisions with the personal data that we hold and process about you. If this changes, we will update this policy accordingly and notify you of that change.

### 8. Marketing

If you are representing your corporate entity, when you provide us with your work email address, we may contact you by email about products and services offered by us which we think may be of interest to you without obtaining your consent. If you wish us to stop sending you such communication, you can let us know through the methods set out below.

Otherwise, we will only contact you by email about products and services offered by us which we think may be of interest to you if you have confirmed you are happy for us to contact 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:

- a. email us at [communications@itftennis.com](mailto:communications@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.)
- b. click the 'Update your details' or 'Unsubscribe' link on any marketing emails that we send you.

For more information about how the ITF processes your personal data for marketing purposes, please refer to the ITF Privacy Notice for Marketing (on the ITF website).

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.

### 9. 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 it to;
- National Associations, Regional Associations and tournament organisers;
- the other tennis governing bodies – ATP, WTA, the Grand Slam Board, Tennis Australia, French Tennis Federation, Wimbledon, and US Tennis Association;
- the ITF Ethics Commission;
- other organisations involved in protecting the integrity of our sport against corruption and anti-doping, including the International Tennis Integrity Agency, formerly the Tennis Integrity Unit, other anti-doping organisations, law enforcement agencies;
- organisations engaged in the process of making or receiving payments on our or your behalf (including WorldPay);
- 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;
- our business partners, advisers, auditors, agents and suppliers who act or may act on our behalf;
- our platform service providers that deliver ITF initiatives, e.g. ITFUNO (by Crionet); and
- our affiliate, Billie Jean King Cup Limited.

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 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.

#### **10. 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:

- As long as you continue to be a business associate of the ITF (including but not limited to being on a board or committee, being employed at one of our national associations, being engaged to provide services to the ITF, or involved with the organisation of our events) we will retain and process information about you;
- Where it is required for compliance with financial reporting obligations, we will keep your personal data for a period of 7 years from the date that you no longer provide or receive ITF services, you or your employer or association ceases to have a legal relationship with us;

- If we ask for your passport and/or visa documentation, we only keep that information for as long as we need it for the specific short-term purposes for which it is requested, for example to assist you obtain a travel visa to attend a tournament, event or meeting;
- Where we process personal data for marketing purposes with your consent, 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 subject access requests, disputes, or safeguarding investigations will be kept for as long as it is necessary for those purposes, as each is applicable.

### 11. 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.

### 12. 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:

- our non-EEA National and/or Regional Associations domiciled in countries wherein you live, work or travel to;
- Other tennis governing bodies based outside the EEA (including the WTA and ATP).

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.

### 13. How to complain

Please contact us using the contact details in the “About Us” section above, [through our Data Protection Officer or EU Representative](#) 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).



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

We may provide our Privacy Notice in French, Spanish, large print, Braille or audio upon request.