

# ITF Privacy Notice – marketing recipients

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.

In some circumstances, our affiliate, Billie Jean King Cup Limited, will be acting as a joint controller as further explained Section 8.

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 receives ITF marketing material, including ITF newsletters and press releases, benefits from our services and products and engages with our online platforms and promotional campaigns.

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 use our online services or receive our newsletters;
- Contact us with any general enquiries;
- Indicate you would like to hear from us when you register or otherwise engage with us as a player, coach or official, or through other programmes, events and conferences that we run;
- Register to and then undertake online learning courses and training programmes;
- Buy tickets to an ITF competition from the ITF, through an ITF-appointed ticketing provider, or from a third-party event organiser and you consent to the sharing of your data;
- Subscribe to our communications and marketing material;
- Enter competitions through our websites or social media;
- Enter the ITF predictor game (“ITF World Tennis Predictor Game”) through our websites and/or applications<sup>1</sup>;
- Complete optional surveys that we use for research purposes and to provide you with a more relevant customer experience; and
- Engage with our promotional campaigns.

We may also obtain data about you:

- that is publicly available, such as information from your social media accounts;
- (if applicable) from your National Tennis Association, if they participate in our promotional campaigns;
- (if applicable) from our affiliate, Billie Jean King Cup Limited, registered in the United Kingdom.

#### 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"> <li>• full name</li> <li>• job title</li> <li>• appearance (through photos or videos provided by you)</li> <li>• email address, home address and/or telephone number</li> <li>• gender</li> <li>• date of birth</li> <li>• countries of which you are a citizen or resident in</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> </ul>
your correspondence	<ul style="list-style-type: none"> <li>• correspondence or communications received or sent, and the information contained within those materials</li> </ul>

<sup>1</sup> Please see Appendix A to this Privacy Notice for processing specific to the ITF World Tennis Predictor Game.

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

Enable our business and pursue our legitimate interests	
<b>Monitor and research</b>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• undertake research to enhance the general appeal and global reach of the game</li> <li>• gather statistics about registration, memberships, accreditation and people interested in tennis</li> </ul>
<b>Other business interests</b>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• promote tennis and the ITF (where you engage with our promotional campaigns)</li> <li>• monitor use of, improve and protect our websites, social media platforms and other online services</li> <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>• monitor and analyse the use of your account / membership with us</li> <li>• identify other products and services you may be interested in and tell you about other products and services</li> <li>• obtain your feedback and respond to and rectify complaints received by you and other service beneficiaries of the ITF</li> <li>• segment your personal data to make sure that you only receive information that is relevant to you</li> <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> </ul>
Legal Obligations	
<b>Compliance with applicable laws</b>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• comply with applicable laws and protect the ITF's legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation).</li> </ul>

### Consent

Otherwise, we may seek your consent to use your personal data, e.g. to send you information about the ITF's competitions, development activity and other ITF business, or to share your data with our affiliates for their marketing purposes. At the time that 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 provide you with the service that you have requested. Even if you refuse consent to receive direct marketing material, the ITF may still contact you specifically in relation to the services that you have requested (e.g. a conference you have registered for).

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.

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

We may use your personal data for profiling purposes, to provide you with content that may be of more interest to you. However, this will not be used to make automated decisions that have any substantial legal or similar impact on you.

## 7. Marketing

We will ask you, when you provide us with your personal data, if you are happy for us to contact you by email about products, competitions and services offered by us and our sponsorship partners which we think may be of interest to you. We may also ask to provide your information to third parties so that they can contact you about their products and services. If you do not agree to this, we will not use your personal data for these purposes.

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:

- 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.)
- Click the 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 is facilitated by our cloud hosting service provider (Microsoft). All data is stored in the UK or European Union.

We share your personal data with:

- You and your representatives;
- Any person you ask us to provide information to (e.g. ITF's sponsors and commercial partners, including TennisPoint, [OFX and Dwight Global Online School](#));
- Our service providers: (i) [Microsoft the supplier of our cloud-based data processing and management services](#); (ii) [Two Circles](#); and (iii) [Two Circles Content](#), our digital support agencies;
- Our advisers, auditors, agents and suppliers who act or may act on our behalf; and
- If necessary: courts and any arbitrator or adjudicator of a dispute involving us; and law enforcement agencies; and
- (if applicable) 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.

Any personal data provided by you as part of our public promotional campaigns, may be shared publicly on our social media platforms.

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.

### Billie Jean King Cup as a Joint Controller

In some circumstances, our affiliate, Billie Jean King Cup Limited, will be acting as a joint controller. Billie Jean King Cup Limited is a company registered in England and Wales under company number 14940977. ITF and Billie Jean King Cup Limited may act as a joint controller for in respect of:

- personal data from members and subscribers of Billie Jean King Cup digital platforms for digital membership and user engagement purposes;
- personal data from members and subscribers of Billie Jean King Cup digital platforms for direct marketing purposes; and
- personal data from members of the Billie Jean King Cup newsletters for direct marketing purposes.

For further information please see our Joint Controller Statement available here: <https://www.itftennis.com/about/help/privacy-notice.aspx>.

### 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 keep processing your personal data while you continue to engage with our emails, and for a period of twelve months from when you stop;
- However, if you ask us to stop processing your data, we will delete your data immediately (but there may be a short period required to allow us to do so and we may retain it on a suppression list).
- If you have provided any personal data specifically to enter an ITF promotional competition, we will delete that personal data once it is no longer necessary for the purposes of delivering the competition (but if during that entry you consent to receive marketing emails we will continue to process your details for that purpose).
- 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 the processing of subject access requests or disputes will be kept for as long as it is necessary for that purpose.

### 10. Your legal rights

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

- Access to your personal data.
- 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.

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 at the email address detailed under the About Us section above, 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.

### **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 transfers to support services for our mailing system.

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 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 can provide our Privacy Notice large print, Braille and audio upon request.

**APPENDIX A**  
**ITF World Tennis Predictor Game**

ITF processes personal data in relation to the ITF World Tennis Predictor Game. How ITF processes personal data in relation to the ITF World Tennis Predictor Game is set out in both the ITF Privacy Notice – Marketing Recipients (the “Marketing Privacy Notice”) and this Appendix A.

**What information do we collect**

We collect and process personal data about you when you register to participate in the ITF World Tennis Predictor Game through ITF’s websites and applications. Personal data will be collected from our ITF World Tennis Predictor Game partner Genius Sports UK Limited (“Genius Sports”).

We will collect personal data about you when you register to participate in the ITF World Tennis Predictor Game. This personal data collected from participants may include:

<u>you as an individual</u>	<ul style="list-style-type: none"> <li>• <u>full name</u></li> <li>• <u>email address, home address and telephone numbers</u></li> <li>• <u>gender</u></li> <li>• <u>date of birth</u></li> <li>• <u>your image</u></li> <li>• <u>for children under 18yrs, information about your parents or guardians</u></li> <li>• <u>if applicable, passport details (you win a prize which require ITF (or an ITF third party travel provider) to book your flights).</u></li> </ul>
<u>your playing information</u>	<ul style="list-style-type: none"> <li>• <u>your activity and results on the ITF World Tennis Predictor Game and recorded by Genius Sports, including but not limited to prediction points, overall rank, number of days played, number of events played</u></li> </ul>
<u>your preferences</u>	<ul style="list-style-type: none"> <li>• <u>whether you wish to receive marketing from us and which types of marketing material you would like to receive</u></li> </ul>
<u>your technology</u>	<ul style="list-style-type: none"> <li>• <u>device identifiers including IP address</u></li> </ul>
<u>your profile and how you use our products and services</u>	<ul style="list-style-type: none"> <li>• <u>details of our services with you, including how you access and use those services, for example via smart phone application, web browser etc</u></li> <li>• <u>cookies</u></li> </ul>
<u>your correspondence</u>	<ul style="list-style-type: none"> <li>• <u>information contained in any correspondence, or communications received or sent by you.</u></li> </ul>

**How do we use your personal data and the legal basis for using that personal data**

In addition to Section 5 of the Marketing Privacy Notice, we will use your personal data for:

<b><u>Performance of our contract with you</u></b>	
<b><u>Fulfil the contract of service that you enter into with us by your entry into and participation in the ITF</u></b>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• <u>verify your identity, set up your account and authenticate your registration when you register with us;</u></li> <li>• <u>take steps in accordance with or linked to fulfilling our contractual obligations and to administer your entry into and participation in the ITF World Tennis Predictor Game (or your withdrawal);</u></li> </ul>

<p><b><u>World Tennis Predictor Game</u></b></p>	<ul style="list-style-type: none"> <li>• <u>communicate with you.</u></li> </ul>
<p><b>Enable our business and pursue our legitimate interests or those of a third party</b></p>	
<p><b><u>Manage and administer the ITF World Tennis Predictor Game</u></b></p>	<p>We will use your personal data to:</p> <ul style="list-style-type: none"> <li>• <u>organise, facilitate and promote the ITF World Tennis Predictor Game;</u></li> <li>• <u>facilitate your participation in the ITF World Tennis Predictor Game.</u></li> </ul>
<p><b><u>Regulate the ITF World Tennis Predictor Game</u></b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• <u>ensure your adherence to the ITF World Tennis Predictor Game Terms and Conditions;</u></li> <li>• <u>investigate and resolve any disciplinary issues or potential breaches of our Terms and Conditions.</u></li> </ul>
<p><b><u>Monitor and research</u></b></p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• <u>monitor how the ITF World Tennis Predictor Game is played and the ways it is evolving to improve player experience;</u></li> <li>• <u>gather statistics about registrations and participation in the ITF World Tennis Predictor Game.</u></li> <li>• <u>monitor use of, improve and protect our websites, social media platforms and other online services</u></li> <li>• <u>update, consolidate and improve our business and the services that we provide to you as well as the accuracy of our records</u></li> <li>• <u>monitor and analyse the use of your account / membership with us</u></li> <li>• <u>identify other products and services you may be interested in and tell you about other products and services</u></li> <li>• <u>obtain your feedback and respond to and rectify complaints received by you and other service beneficiaries of the ITF</u></li> <li>• <u>segment your personal data to make sure that you only receive information that is relevant to you</u></li> <li>• <u>develop and improve ITF business functions and facilitate investment in, and the growth of, our business</u></li> </ul>

**Who will we share your personal data with?**

Genius Sports will process your personal data on our behalf, and only in accordance with our instructions. 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 name or your team’s name may be published on the ITF’s websites or applications, including for promotion, marketing and publicity purposes for the ITF and the ITF World Tennis Predictor Game.

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