

# Billie Jean King Cup Limited Privacy Notice – ticket purchasers and marketing recipients

Please read this notice carefully.

## 1. About Us

Billie Jean King Cup Limited (“**BJKCL**”) is a data controller of any personal data it collects and holds about you. The BJKCL is referred to as “we”, “us” and “our” in this privacy notice. We are a company registered in England and Wales under company number 14940977. We are registered on the Information Commissioner's Office Register; registration number ZB675162.

In some circumstances, our affiliate, ITF Licensing (UK) 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.

Please note that the Billie Jean King Cup website and other digital platforms may contain links to third party websites / digital platforms. We are only responsible for the privacy practices and security of our own digital platforms. We recommend that you check the privacy and security policies and procedures of every other website / digital platform that you visit.

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
Email	dataprotectionofficer@BJKcupltd.com

## 2. Who this privacy notice applies to

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

- receives BJKCL marketing material, including BJKCL newsletters and press releases;
- benefits from our services and products;
- engages with our online platforms and promotional campaigns; and
- purchases tickets for any Billie Jean King Cup events.

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:

- Subscribe to our communications and marketing material;

- Buy tickets for (or otherwise attend as a member of the public) any Billie Jean King Cup events (either from BJKCL through a BJKCL appointed ticketing provider, or from a third-party event organiser and you consent to the sharing of your data);
- Register to use our online services or receive our newsletters;
- Contact us with any general enquiries;
- Enter competitions through our websites or social media;
- 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; and
- (if applicable) from our affiliate, ITF Licensing (UK) 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> <li>• your ticket purchase details</li> <li>• your image and video</li> </ul>
your preferences and digital journey	<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> <li>• which promotions or adverts you respond to</li> <li>• which videos you watched, articles you read, and content you liked</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>• information collected in any forms that you complete</li> <li>• information collected in any correspondence or communications received or sent, and the information contained within those materials</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	
<b>Fulfil any contract of service that you enter into with us</b> (e.g. when you purchase tickets)	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> <li>• manage and administer the online sale and purchase of tickets for any Billie Jean King Cup events</li> <li>• in the event you purchase tickets for any Billie Jean King Cup events, to monitor your compliance with the terms of our</li> </ul>

	contract, including: crowd management and security when you attend the Billie Jean King Cup event; and restrictions on your use of content from the Billie Jean King Cup event.
<b>Enable our business and pursue our legitimate interests or those of a third party</b>	
<b>Monitor and research</b>	We may use your personal data to: <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>	We may use your personal data to: <ul style="list-style-type: none"> <li>• promote tennis, BJKCL and the Billie Jean King Cup (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 BJKCL</li> <li>• segment your personal data to make sure that you only receive information that is relevant to you</li> <li>• develop and improve BJKCL business functions and facilitate investment in, and the growth of, our business</li> <li>• manage and mitigate the risks to you and us</li> <li>• promote Billie Jean King Cup events (including using images and video of you in attendance at a Billie Jean King Cup event).</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 fraud, misrepresentation, security incidents or crime, in accordance with applicable laws.
<b>Investigate and respond to complaints, disputes and where necessary to bring or defend legal claims</b>	We may use your personal data to: <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 protect the BJKCL’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).

## Consent

Otherwise, we may seek your consent to use your personal data, e.g. to send you information about the Billie Jean King Cup events, 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, BJKCL may still contact you specifically in relation to the services that you have requested.

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@bjkcupltd.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**

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;
- organisations involved in the ticket selling process, or managing a Billie Jean King Cup event for which you have purchased tickets; and
- Any person you ask us to provide information to (e.g. BJKCL sponsors and commercial partners);
- 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, ITF Licensing (UK) Limited.

Some of these third parties will act as a processor on behalf of the BJKCL, 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.

### **ITF Licensing (UK) Limited as a Joint Controller**

In some circumstances, our affiliate, ITF Licensing (UK) Limited, will be acting as a joint controller. ITF Licensing (UK) Limited is a company registered in England and Wales under company number 02584446. BJKCL and ITF Licensing (UK) Limited may act as a joint controller for in respect of:

- spectator personal data (i.e., from the sale of tickets) for the purpose of managing and administering Billie Jean King Cup competitions;
- 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:

- if you sign-up to receive any of our email newsletters we will hold information about you for a maximum period of 12 months after you have unsubscribed from all such newsletters. If you ask us to stop processing your data for this purpose 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 purchase tickets for any Billie Jean King Cup events we will hold information about your ticket purchase details for as long as it is necessary to fulfil the purpose of managing and administering the online sale and purchase of tickets, and facilitating your attendance at that event (but if during that purchase you consent to receive marketing emails we will continue to process your details for that purpose);
- If you have provided any personal data specifically to enter a BJKCL 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 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 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.