

ITF Privacy Notice – Davis Cup/ Billie Jean King Cup websites

Note: This Privacy Notice only applies to individuals who visit and navigate the Davis Cup and/or Billie Jean King Cup websites. If you engage with the ITF in any other way, your personal data will be processed in accordance with the applicable Privacy Notice. All ITF Privacy Notices can be found on the ITF website.

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.

Please note that our 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
Data Protection Officer's Email:	dataprotectionofficer@itftennis.com

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 visits the Davis Cup and/or Billie Jean King Cup websites (the **Websites**) and/or:

- purchases tickets for any ITF events (for example, Davis Cup, Billie Jean King Cup and Hopman Cup);
- navigates and interacts with the Websites;
- registers as a user on the Websites;
- signs up for any newsletter, membership, or online subscription on the Websites;
- expressly provides us with their personal data on the Websites.

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 visit and interact with the Websites (for example which pages you visit or what browser or device you are using).

Depending on the services that you use we may also obtain data about you:

- if you purchase tickets for (or otherwise attend as a member of the public) any ITF events (for example, Davis Cup, Billie Jean King Cup and Hopman Cup);
- if you choose to register with the Websites and create an ITF Tennis ID user account to access the Watch Live service;
- if you choose to complete optional surveys that we use for research purposes;
- if you sign-up for our newsletters or for competitions or promotions;
- if you send us an email or other types of message in connection with your use of the Websites; and
- when you digitally interact with the ITF via the Websites and other digital channels and the resources that you access which may include the use of cookies (subject to our Cookie policy).
- (if applicable) from our affiliate, Billie Jean King Cup Limited.

4. The types of personal data we process

Your personal data	
you as an individual	<ul style="list-style-type: none"> • your name • your email address • your nationality • your date of birth • your sex • <u>your ticket purchase details</u> • <u>your image and video</u>
Your user account details (if applicable)	<ul style="list-style-type: none"> • your unique user ID (Tennis ID) • your membership or subscription status
your technology information	<ul style="list-style-type: none"> • how you have reached our digital platform • your device identifiers including IP address • your browser type, versions and plug-ins, and your operating system • your journey through the Websites, including which links you click on and searches you made, how long you stayed on a page, and other page interaction information

your preferences and digital journey	<ul style="list-style-type: none"> • whether you wish to receive marketing from us and which types of marketing material you would like to receive • which promotions or adverts you respond to • which videos you watched, articles you read, and content you liked
your correspondence	<ul style="list-style-type: none"> • information collected in any forms that you complete • information contained in any correspondence, or communications received or sent by you in respect of the Websites

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

Performance of our contract with you	
<p>Fulfil any contract of service that you enter into with us (e.g. when you register for or purchase an ITF product or service, <u>including tickets</u>, or enter one of our Website competitions)</p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> • <u>manage and administer the online sale and purchase of tickets for any ITF events</u> • verify your identity, IP address and other information provided to us about you • set up your account and authenticate your registration when you register with us • to enable us to administer any competitions or other offers/promotions which you enter • receive and manage payments (if you purchase an ITF product or service, <u>including tickets</u>) – 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 • communicate with you • <u>in the event you purchase tickets for any ITF events, to monitor your compliance with the terms of our contract, including:</u> <ul style="list-style-type: none"> ○ <u>crowd management and security when you attend the ITF event; and</u> ○ <u>restrictions on your use of content from the ITF event.</u>
Enable our business and pursue our legitimate interests or those of a third party	
<p>Other business interests</p>	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> • 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 and to enable us to identify our users, members and service beneficiaries • identify other products and services you may be interested in and tell you about other products and services • obtain your feedback and respond to and rectify complaints • 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 • conduct market research • <u>promote ITF events (including using images and video of you in attendance at an ITF event).</u>

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: <ul style="list-style-type: none"> • identify and record facts and evidence • investigate and respond to complaints, disputes, regulatory investigations and/or to bring or defend legal claims
Consent	
	We may seek your consent to use your personal data for some purposes. When 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 services that you have requested
Legal Obligations	
Compliance with applicable laws	We may use your personal data to comply with applicable laws and protect of 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)

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 may ask you, when you provide us with your personal data, if you are happy for us, or our commercial partners, to contact you about products and services offered by us or our commercial partners 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.

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. email us at 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.)
2. 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.

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 may share your personal data with:

- our Website hosting partner, Sportradar, but only if this is necessary to properly administer and protect the integrity of the Websites;
- our affiliate, Billie Jean King Cup Limited, if you visit or use the services on the Billie Jean King Cup website;
- organisations involved in the ticket selling process, or managing an ITF event to which you have purchased tickets; and
- the International Tennis Integrity Agency, if while attending an ITF event you breach the prohibition on use of match data for betting purposes.

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.

In all instances where we disclose your information to third parties, we will ensure that your information is appropriately protected.

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 spectator personal data (i.e., from the sale of tickets) for the purpose of managing and administering the Billie Jean King Cup competition. 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 keep a record of the fact that you have asked us not to send you email newsletters or to process your data indefinitely so that we can respect your request in future;
- if you chose to register and create an ITF Tennis ID user account we will hold information about you for as long as you have an active user account with us;
- if you have provided any personal data specifically to enter a promotional competition, we will delete that personal data immediately after the competition has finished (but if during that entry you consent to receive marketing emails we will continue to process your details for that purpose);

- if you purchase tickets for any ITF events we will hold information about your ticket purchase details for as long as it 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 choose to complete an optional survey, we will hold information about you only for a maximum period of 12 months after you completed the survey.

If you have not subscribed, registered, entered a competition or promotion, completed an optional survey or corresponded with us, we will not store any data that could be used to personally identify you.

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, or non-compliance with ticketing terms or Website terms of use, will be kept for as long as it is necessary for those purposes.

10. Children

If you are under 16 and register for restricted areas of our digital platforms, we will collect your date of birth. This helps us provide age-appropriate adaptations.

If you registered on our digital platforms after 22 August 2023 and you are under 16, we won't send you marketing emails, or share your personal data with our commercial partners. We will still contact you about the product or service you sign up for (for example viewing Davis Cup or Billie Jean King Cup matches on our streaming platform).

If you are 13-15 years old

You must get your parent or legal guardian's consent to register on our Websites. Make sure they know and agree each time you:

- email us, or ask us to email anything to you;
- send us any information;
- enter a competition or survey;
- buy anything from us (like a subscription or tickets).

Parents/Legal guardians of 13-15 year olds

Please note we do not seek your direct consent to your child's registration, but we expect them to inform you and get your agreement in advance before they register and before each time they do any of the activities listed above.

If you are under 13

You must get your parent or guardian's permission to use the restricted areas of our Websites.

You must truthfully tell us your name, email address, country and date of birth. This sort of information is important to protect you. That is why we ask you to let your parent or legal guardian know what you are doing, and get them to say yes.

You must tick a box to confirm they have said yes. If they say no, you will not be able to register. But, you will still be able to use the public areas of our website to find out information about the Davis Cup and Billie Jean King Cup.

Once you have registered, you still need to tell your parent / guardian before you:

- email us, or ask us to email anything to you;
- send us any information; or
- enter any competition or game.

Parents/Legal guardians of children under 13

Your child can access and use unrestricted areas.

If they wish to register, we ask them to obtain your consent, and confirm that they have done so by ticking a box in the registration process. There is not a verification process within this. If you are concerned that your child may have registered without your consent, please contact us using the contact details at the top of this Privacy Notice.

11. Cookies

In common with many other website operators, we use standard technology called 'cookies' on the Websites. Cookies are small pieces of text information that are stored by your browser on your device and they are used to record or customise your interactions with the Websites on each visit.

For further, more detailed information on how we use cookies please refer to our Cookies Policy which can be accessed on the Websites.

12. 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 (DataProtectionOfficer@itftennis.com) 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.

13. Sending your personal data outside the UK and the EEA

We will not send your personal data outside the UK or the EEA.

14. 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.

15. Our Privacy Notice available in other formats

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