

ITF Privacy Notice – Davis Cup and Billie Jean King Cup participants

Note: This Privacy Notice does not apply to the ITF circuits. If you want to know how the ITF processes your personal data when you participate on an ITF circuit, please refer to the Privacy Notice for players in ITF competitions on the ITF website and via IPIN.

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. 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	dataprotectionofficer@itftennis.com

2. Who this privacy notice applies to

This privacy notice explains how we will use the personal data of anyone who is nominated to play in the Davis Cup or Billie Jean King Cup; or is otherwise a member of a national team participating in the Davis Cup or Billie Jean King Cup (the “**Competition**”), such as team captain, medical personnel and team managers.

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 to represent your nation in the Competition; when you (or your National Association) submits information to enable the ITF to assess your eligibility to participate in the Competition; when you participate in the Competition; and when you communicate with us about your participation in the Competition (e.g. email enquiries, 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 other organisations, including 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 of the Competition, and members of the public who write to us in relation to you or who we contact in relation to investigations or other enquiries;
- from the Competition medical staff, if you have been treated on site and need to submit medical information;
- from the International Tennis Integrity Agency, formerly the Tennis Integrity Unit, other ITF-appointed service providers or independent 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 the Competition;
- 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 Competition; and
- when we ask you to complete optional surveys that we use 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 personal data about:

you as an individual	<ul style="list-style-type: none"> • full name and title • email address and telephone number • gender • date of birth • nationality • country of residence • language spoken • physical appearance (photography) • passport details and/or residency cards to verify your nationality or age • for players under 18yrs, the name of your parents
your playing information	<ul style="list-style-type: none"> • activity and results in the Competition, and other international tennis competitions such as the ATP tour, WTA tour, and the Grand Slams • ranking (ATP, WTA, ITF, WTN and national) • tennis biography details such as when you started playing tennis, preferred surface, playing hand/doubles hand, head to head records, how many times you have represented your country, win/loss record in the Competition and any other information you provide us for your tennis biography
your Performance Analysis (PAT) Data	<ul style="list-style-type: none"> • performance analysis data from tennis matches played by you and recorded by our third party data suppliers (e.g. Hawk-Eye and Microsoft)
your compliance with our regulations	<ul style="list-style-type: none"> • information relating to potential or actual Code of Conduct violations

	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • information contained in any correspondence, or communications received or sent by you
your sensitive information	<ul style="list-style-type: none"> • details (if any) about your health and medical history that you provide to us, or that we collect about you during the Competition, including injuries and illnesses • details of your racial and ethnic background that you provide to us regarding your national eligibility
your criminal history	<ul style="list-style-type: none"> • 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 service that you enter with us (e.g. when you are nominated for and participate in the Competition subject to the relevant competition regulations)	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> • 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 Competition, and to administer your entry into, participation in and attendance at that Competition (or your withdrawal); • assess your eligibility to represent your nation; • 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 Competition	<p>We will use your personal data to:</p> <ul style="list-style-type: none"> • organise and facilitate the Competition, which includes: <ul style="list-style-type: none"> ○ enabling our nominated licensees, to organise and facilitate the Competitions' respective Finals. • promote the Competition, which includes: <ul style="list-style-type: none"> ○ <u>provide you with analytics tools showing information on your performance using player analysis (PAT) data and your playing information;</u> ○ permitting broadcasters <u>and technology suppliers</u> to display 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 National Association's nomination process to enable you to participate in the Competition; • take steps in relation to our contractual obligations with your National Association, for your and your nation's benefit. • provide accurate information to your National Association and the other tennis governing bodies, including your ITF ranking

	<p>and World Tennis Number (if applicable), email address, nationality and DOB;</p> <ul style="list-style-type: none"> • monitor your participation in, or withdrawal from the Competition and the reasons for any withdrawal, for the purpose of assessing your eligibility for the Olympic Games.
Develop the game	We may use your personal data to develop tennis as a global sport and encourage participation.
Regulate and protect the integrity of the game	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> • ensure your adherence to the rules, regulations and codes of conduct that apply to the Competition; • investigate and resolve any disciplinary issues or potential breaches of our Rules and Regulations and Codes of Conduct that you may be involved in; • uphold the highest stands of integrity in respect of the game of tennis and of the ITF.
Monitor and research	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> • monitor how the game is played and the ways it is evolving to improve player experience; • undertake research in various industries including (but not limited to): <ul style="list-style-type: none"> ○ player performance; ○ injury and wellbeing; ○ the Competition format, regulations and umpiring; ○ retention of players and global reach of the game; ○ tennis facilities, resources and equipment.
Other business interests	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> • update, consolidate and improve our business and the services that we provide to you as well as the accuracy of our records; • identify other products and services you may be interested in and telling you about other products and services; • obtain your feedback and respond to and rectify complaints received by you and others; • 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 international team tennis and the ITF; • manage and mitigate risks to you and our federation.
Comply with our legal and regulatory obligations	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	<p>We may use your personal data to:</p> <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.
Legal Obligations	
Compliance with applicable laws	We may use your personal data to comply with applicable laws and protection 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 proceedings or litigation).
Consent	
Consent-based processing	In some cases, we may need to seek your consent to use your personal data. When we ask for your consent we will explain the reasons why. You are entitled to refuse consent. However, depending on the situation, your refusal to provide consent may mean that we are unable to provide you with the services that you have requested.
Substantial Public Interest Reasons	
Where processing is necessary for reasons of substantial public interest	<p>We may process information about your medical history, ethnic and racial background and information about any criminal convictions you have had (“Special Category Data”).</p> <p>Any Special Category Data will only be processed where it is necessary and only:</p> <ul style="list-style-type: none"> • 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 because it is necessary for substantial public interest, which includes: <ul style="list-style-type: none"> ○ 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; ○ 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. processing nationality to confirm eligibility); ○ protecting children and adults at risk against physical, mental or emotional harm, or neglect; and ○ 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 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 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 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 data storage facilities in Roehampton and Slough (United Kingdom). The storage of our data is managed at these locations by Microsoft 365, our Hosted Service Provider.

We share your personal data with:

- your representatives, agents and any other person you ask us to provide your information to;
- our designated licensees, e.g. Kosmos Global Tennis, which are licensed to deliver and exploit parts of the Competitions;
- if applicable to your level of the Competition, PAT data on your performance, including historic PAT data will be available to your team and the other teams participating in the Competition, via a tablet device (which for example in the Billie Jean King Cup Finals Week, is provided by the ITF's sports data partner Microsoft);
- National Associations and Regional Associations (where applicable);
- the other tennis governing bodies – ATP, WTA, the Grand Slam Board, Tennis Australia, French Tennis Federation, Wimbledon, and US Tennis Association;
- 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;
- Competition organisers and officials;
- sports disciplinary bodies that have responsibility under the regulations to hear cases and appeals, including the Internal Adjudication Panel, International Tennis Integrity Agency (formerly the Tennis Integrity Unit), the Independent Tribunal (run by Sport Resolutions UK) and the Court of Arbitration for Sport;
- our sports data partners (e.g. Sportradar, Hawk-eye and Microsoft) for commercial use and for officiating purposes (competition draws, live-scoring data, PAT data and results);
- broadcasters, sponsors and other commercial partners, for promotion and publication of the Competition (e.g. Microsoft);
- players or National Associations that request their PAT 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 for your nation and any other information relevant to your participation in the Competition for a period of six years from the date we receive notification from your national association (or you) that you have retired from participation in the Competition.

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 Competition 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; and
- 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 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.

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 your data, and it may be processed, outside the United Kingdom (UK) and the European Economic Area (EEA). This includes:

- National Associations or Regional Associations outside the EEA if you have been nominated to participate in a Competition tie taking place in that nation or region, or are otherwise associated with them;
- the ATP, WTA, USTA and Tennis Australia;
- World Anti-Doping Agency; and
- Competition officials not based in the EEA.

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 may also provide our Privacy Notice in large print, Braille and audio upon request.