

ITF Privacy Notice – Athlete Management System

Note: This Privacy Notice only applies to users of the ITF Athlete Management System (the “AMS”). All references to AMS within this Privacy Notice are intended to be inclusive of all modules, functionality, and/or services provided by AMS (e.g., including the Player Wellbeing module).

If you engage with the ITF in any other way, your personal data will be processed in accordance with the applicable Privacy Notice(s). 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.

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 Privacy 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. These updates will be published on the ITF website, and we encourage you to regularly check the ITF website to stay informed about any changes that may apply to you and your data.

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	<u>To comply</u>
Telephone Number	+44 20 8878 6464	<u>with the</u>
Data Protection Officer’s Email	dataprotectionofficer@itftennis.com	<u>General</u>

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
EUREP@twobirds.com
Key Contact: Vincent Rezzouk-Hammachi

2. Who the Privacy Notice applies to

The Privacy Notice explains how we will use the personal data of anyone who:

- accesses and uses the AMS through a secure login, including (but not limited to):
 - tennis players;
 - tennis player’s nominated data inputter (e.g., coaches, legal guardians, private doctors, and ITF appointed medical practitioners) (a “**Nominated Data Inputter**”);
 - ITF appointed coaches;

- ITF appointed medical practitioners (e.g., physiotherapists and doctors);
- ITF appointed classification personnel; and/or
- other authorised AMS end users (e.g., ITF administrators, National Association representatives, Training Centre staff) ("**Other End Users**").

Each such person is referred to as "you" and "your" in the Privacy Notice.

3. How we obtain your personal data

We collect and process your data when you:

- register for and use the AMS;
- login to your secure AMS account to enter information about you and your tennis;
- conduct a medical consult with a Nominated Data Inputter who enters information about you and your tennis within AMS; and
- log in to a secure AMS account that you have been given access to, to enter information about a player and their tennis.

We may also obtain data about you:

- from our database which is linked to your IPIN account;
- From Other End Users who enter data on behalf of or about you;
- from other organisations, including the International Tennis Integrity Agency, 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 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 player analysis technology suppliers such as Electronic Line Calling systems in relation to your participation in our competitions;
- when we ask you to complete optional surveys that we use for research purposes into the game of tennis and the AMS; and
- when you digitally interact with the AMS.

4. The types of personal data we process

4.1 Players

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

your personal details	<ul style="list-style-type: none"> • full name • gender • contact telephone number • residential address • email address • date of birth • height and weight • nationality • unique identifier code • <u>your Tennis ID</u>
documentation completed by you or on your behalf	<ul style="list-style-type: none"> • pre and post tour reports • post tour questionnaire • <u>medical consults</u> • executed documents for: <ul style="list-style-type: none"> ○ Code of Conduct ○ Anti-Doping

	<ul style="list-style-type: none"> ○ Anti-Corruption ○ <u>Safeguarding</u>
other information identifying you	<ul style="list-style-type: none"> • AMS username and password
your playing information	<ul style="list-style-type: none"> • activity (<u>including playing conditions</u>) and results in our competitions, and other tennis competitions that you participate in such as national/regional competitions, the ATP tour, WTA tour, and the Grand Slams • ranking (<u>WTN, ATP, WTA, ITF, regional and national</u>) • tennis biography details such as when you started playing tennis, preferred surface and playing hand/doubles hand • fitness testing components and training load • recorded footage of training and performance in competition • performance goals, and development plan recorded by you
your Player Analysis Technology (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 for sporting reasons • performance analysis data from testing and screening (fitness, psychological, medical and physiological)
your compliance with our and/or other relevant regulatory bodies' regulations	<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 • <u>Information relating to your compliance with the rules, regulations and Codes of Conduct that apply to you</u>
your preferences	<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
your technology	<ul style="list-style-type: none"> • device identifiers including IP address and information on how you access and use the AMS, for example via smart phone application • cookies usage
your medical and wellbeing information	<ul style="list-style-type: none"> • details that you provide us, <u>or provided on your behalf by a Nominated Data Inputter</u> through the AMS about your <u>general health and wellbeing</u>, medical history (including impairment information for wheelchair tennis players, medications, allergies, and vaccinations), injury record (for example, medical registration form) and your racial and ethnic background

4.2 Coaches, Medical Practitioners, Next of Kin(s), Legal Guardian(s), Classification Personnel, Other End Users

We will only process a limited amount of personal data about you, including personal data about:

your personal details	<ul style="list-style-type: none"> • full name • <u>profession (if applicable)</u> • residential address (if necessary) • contact telephone number • email address • date of birth (legal guardians and <u>Next of Kin(s)</u> only)
other information identifying you	<ul style="list-style-type: none"> • AMS username(s) and password(s)
your technology	<ul style="list-style-type: none"> • device identifiers including IP address and information on how you access and use the AMS, for example via smart phone application • cookies

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

Legal Basis	Purpose	Data Subject
Performance of our contract with you		
Fulfil the contract of service that you enter into with us regarding your use of the AMS	<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, including (where applicable) your <u>user permissions</u> to access and use the AMS on behalf of the account holder • set up your account and authenticate your registration • take steps in accordance with or linked to fulfilling our contractual obligations to provide you with the AMS • Communicate with you 	Player Coach Medical Practitioner Legal Guardian <u>Next of Kin(s)</u> Classification Personnel Other End Users <u>Nominated Data</u> <u>Inputter(s)</u>
Enable our business and pursue our legitimate interests or those of a third party		
Monitor and research	<p>We may use your personal data to:</p> <ul style="list-style-type: none"> • monitor how the game is played • evaluate player performance • assess the incidence of injury and illness in tennis • develop, improve and maintain the ITF World Tennis Number • undertake research to improve tennis-specific technologies (for example: recovery and injury prevention programmes, performance trajectory software and scoring methods) • gather statistics about participation, performance, and prevalence of injuries 	Player
Manage our competitions and tournaments	We may use your personal data to assess player eligibility to compete in ITF tournaments and events (for example: pursuant to wheelchair tennis player evaluations)	Player Classification Personnel
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 you • investigate and resolve any disciplinary issues or potential breaches of our Rules and Regulations and Codes of Conduct that you may be involved in • <u>information relating to your compliance with the ITF Gender Eligibility Policy (or its equivalent in place from time to time)</u> • uphold the highest stands of integrity in respect of the game of tennis and of the ITF 	Player Coach Medical Practitioner Legal Guardian <u>Next of Kin(s)</u> Classification Personnel Other End Users
Other business interests	<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 AMS (<u>which shall include improving existing functionality of the AMS and adding further functionality to AMS</u>) • obtain your feedback and respond to and rectify 	Player Coach Medical Practitioner Legal Guardian <u>Next of Kin(s)</u> Classification Personnel Other End Users

	<p>complaints received by you and other AMS users</p> <ul style="list-style-type: none"> analyse your personal data to 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, our business 	
Comply with our safeguarding, legal and regulatory obligations and codes of practice	<p>We may use your personal data to monitor, prevent, investigate and/or report fraud, misrepresentation, security incidents or crime, in accordance with applicable laws.</p>	<p>Player Coach Medical Practitioner Legal Guardian <u>Next of Kin(s)</u> Classification Personnel Other End Users</p>
Legal Obligations		
Compliance with applicable laws	<p>We may use your personal data to comply with Player with applicable laws and protect the ITF's legal rights, Coach applicable including, but not limited to, use in connection with Medical Practitioner laws 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).</p>	<p>Player Coach Medical Practitioner Legal Guardian <u>Next of Kin(s)</u> Classification Personnel Other End Users</p>
Consent		
	<p>We may seek your consent to use your personal data for other 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 full use of the AMS.</p>	<p>Player Coach Medical Practitioner Legal Guardian <u>Next of Kin(s)</u> Classification Personnel Other End Users</p>
Substantial Public Interest Reasons		
	<p>We may process information about your medical history, ethnic and racial background ("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 and/or at the point of the data being processed); or where we are legally permitted or required to process this information without seeking your consent; and 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 	

	<p>protecting the integrity of tennis from dishonesty, malpractice or other seriously improper conduct;</p> <ul style="list-style-type: none"> ○ 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. classification for wheelchair tennis players); ○ protecting children and adults at risk against physical, mental or emotional harm, or neglect; and/or ○ processing for the purpose of addressing non-compliance with the regulations applicable to our competitions. 	
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By registering for and/or entering personal information on the AMS (either yourself or via a Nominated Data Inputter(s)) about your training and performance, incidence of injury and general health as a tennis player (Special Category Data), you consent to the ITF processing that information and running data reports based on that information. Please note that any subsequent reports will be sufficiently anonymised or pseudonymised and securely transferred if they are to be shared outside of the ITF.

Where we have obtained your consent to processing 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.

Where we process your personal data on the basis of legitimate interests, you can request a copy of the balancing test for that data processing using the contact details set out at the beginning of this notice.

5. How we use your personal data to make automated decisions – Players only

We may make an automated decision on the basis of your personal data to determine your ITF World Tennis Number. This automated decision is made pursuant to your explicit consent to have an ITF World Tennis Number.

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.

6. Who we share your personal data with

Your personal data may be shared with ITF Limited, registered in the Bahamas, and our other group companies. Hosting and storage of your personal data takes place at our data processor's (Teamworks Innovations UK Limited) secure data storage facilities. Please refer to Teamworks Innovations UK Limited's Privacy Policy for further details about how your data will be processed and stored, accessible via the AMS login page.

We may share your personal data with:

- Teamworks Innovations UK Limited is our software provider for the AMS;
- Other End Users and/or Nominated Data Inputter(s) that are instructed to input data for and/or about you;

- any person you ask us to provide any AMS information to;
- National Associations and Regional Associations that have access to the AMS;
- the International Olympic Committee and International Paralympic Committee (as appropriate);
- the other tennis governing bodies – ATP, WTA, the Grand Slam Board, Tennis Australia, Fédération Française de Tennis, AELTC, and United States Tennis Association;
- other anti-doping organisations, such as the World Anti-Doping Association, your national anti-doping organisation and our appointed anti-doping service provider;
- sports disciplinary bodies that have responsibility under the regulations to hear cases and appeals, including the International Tennis Integrity Agency, the Independent Tribunal (currently run by Sport Resolutions UK), the Safeguarding Panel (currently run by Sport Resolutions UK) and the Court of Arbitration for Sport; 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.

7. 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 collect it, which is as follows:

Trigger Event – deactivation of AMS account

Data Subject	Personal Details	Documentation	Performance and Playing Data	Special Category Data
Player	3 years	7 years	7 years + height, weight and year of birth	7 years
Legal Guardians	3 years	3 years		
Coaches	3 years	3 years		
Medical Practitioners	3 years	7 years		
Classification Personnel	3 years	7 years		
Other End Users	3 years	3 years		

We may retain certain personal data for longer where it is necessary for us to meet our legal and regulatory obligations. For example, personal data linked to disciplinary cases under applicable regulations, subject access requests, disputes, or safeguarding investigations will be kept for as long as it is necessary for those purposes, as each is applicable.

We may retain your Special Category Data for longer than seven years for sporting research and to gather statistics about the game, for example player performance patterns, tracking incidence of injury, and assessing athlete impairment against performance. Where we keep your Special Category Data for

research purposes for longer than seven years, we will anonymise that data.

8. 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 organisation;
- erasure of personal data;
- restriction to our processing of your personal data; and/or
- 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. In most cases we will respond to your request within one month.

9. 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:

- Classification Personnel (Wheelchair) based and conducting testing outside the EEA;
- The IOC, IPC, ATP, WTA, United States Tennis Association and Tennis Australia;
- Regional Associations (COTECC, COSAT, OTF, ATF, CAT);
- World Anti-Doping Agency and International Tennis Integrity Agency, if operating outside the EEA.

Where we transfer your data outside of the EEA, in countries that do not have an Adequacy Decision, 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.

10. 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.

11. Our Privacy Notice available in other formats

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