

# Tennis Foundation Privacy Notice

## 1. Introduction and about us

This privacy notice explains how the Tennis Foundation ("TF" or "we", "our", "us) collects, uses and shares your personal data.

How we use your personal data depends on whether you interact (or have interacted) with us as a player or other beneficiary, a coach or official, a volunteer, an actual or potential donor, a user of our website ([www.tennisfoundation.org.uk](http://www.tennisfoundation.org.uk)), a representative of a delivery partner or in some other way. This privacy notice gives a general overview of how we process personal data but you may receive more detailed information about data protection (including separate privacy notices) depending on the different ways you interact with us.

The Tennis Foundation, which is registered with the Information Commissioner's Office under registration number Z9188725, is the 'controller' of your personal data for the purposes set out below. TF is subject to the General Data Protection Regulation (the "GDPR") with effect from 25 May 2018.

## 2. The categories of personal data we collect

We collect and process a range of information about you. This includes, for virtually all individuals, your name and contact information (such as your home and/or business address (as applicable), email address and telephone number, and including a parent's, guardian's or carer's contact details (for example, for players and beneficiaries who are children, where communications are sent to their parent)), records of communications and interactions we have had with you by various means, basic biographical information including your date of birth and gender (where relevant), and financial information including bank account details (used for accepting payments from you or making them to you, as applicable).

In addition, we will collect the following categories of personal data depending on how you interact with us:

*For players:*

- Match-play and training-related data;
- Rankings and ratings;
- Dietary requirements and other information relevant for training or competition arrangements;
- Medical records and injury information; and/or
- Anti-doping and disciplinary information, where relevant.

*For coaches and officials:*

- Accreditations, qualifications and training;
- Availability, selection and travel information;
- Evaluations and assessments of players and matches;
- DBS information (criminal records checks), where applicable; and/or
- Disciplinary and safeguarding information, where relevant.

*For volunteers:*

- Records of activity such as volunteer role(s), length of service, awards and number of hours;
- Application or registration details for the purposes of volunteering;
- Reference checks;
- Disciplinary and safeguarding information, where relevant; and/or
- Availability information.

*For website users:*

- Login ID information, including usernames; and/or
- Information provided through our website, including in messages and forms, for example forms for updating communication and marketing preferences.

*For potential donors:*

- Information from public domain sources including media articles, Companies House, the Charity Commission and other charity registers, published biographical guides, company websites, reputable social media platforms, geographic and demographic information based on your postcode, wealth information.

We may also collect ethnicity, equal opportunities and diversity data, information about disabilities and photos and videos (including of children and young people and of disabled players), and passport numbers. Our activities may also require us to process such special category data and/or data relating to criminal convictions and offences (together "sensitive personal data"), including as set out above.

### **3. How we collect personal data**

We may collect your personal information in a number of ways, principally:

- Directly from you, for example when you attend our events, join a performance programme as a player, enter a tournament, provide coaching or officiating services, and make enquiries on our website, and when you interact with us during your participation in tennis in various other ways
- From someone else acting on your behalf, for example from your parent or guardian for you as their child or from your carer;
- From other third parties, such as the Lawn Tennis Association ("LTA"), with whom as the national governing body we work closely; third parties who know you and believe you would be interested in our services/activities; public domain sources (more details above) where we identify that you may be interested in our services/activities and our supporting us; when a coach or official provides performance or results data to us on behalf of a player, or when our staff who are working with you in your capacity as a player, coach or official record information about you, for example when coordinating competitions
- On rare occasions, we may receive information about you from others who are not acting on your behalf (for example, where someone makes a complaint about you which we then investigate);
- By creating it ourselves, for example when we produce match reports from watching players compete at events and/or make recordings at such events; and/or
- (Where you are a volunteer) when you make enquiries on our website, or when you interact with us (for example, where you volunteer to assist with a competition, tournament or league organised by us, sign up for our volunteer communications, enquire about a volunteering opportunity), or when your details are passed to us for the purposes of volunteer recognition.

We also collect certain personal data by automated means, including about visitors to our offices using CCTV monitoring.

### **4. Our basis for processing personal data and the purposes for which we use it**

*Performance of contracts.* We will process your personal data where this is necessary for the performance of a contract with you, or to take steps at your request before entering into such a contract. For example, we need to process personal data in order to comply with the funding and player support agreements with players, services contracts with coaches and officials, volunteer services agreements and the terms and conditions applicable to the use of our website.

*Compliance with our legal obligations.* In some cases, we need to process your personal data in order to comply with legal obligations. For example, we need to process personal data in order to comply with health and safety legislation, carry out DBS (criminal records) checks on coaches, officials and volunteer roles (where relevant) for safeguarding purposes, report certain tax information to HM Revenue & Customs,

and (potentially) assist with investigations by police and/or other competent authorities.

*Legitimate interests.* In other cases, the TF has 'legitimate interests' in processing personal information about individuals we interact with. These include our work to make tennis inclusive and accessible to all people and communities. For example, we need to process personal data in pursuit of our legitimate interests in order to:

- organise competitions and major events, and process and publish results, ratings and rankings data from competitions;
- ensure the security of our events and premises, including by recording individuals' photographs as part of event accreditation processes and capturing individuals' images using CCTV monitoring;
- conduct surveys and seek advice from advisers with the aim of improving the TF and our services;
- keep appropriate records of coaches, officials and volunteers;
- administer our performance programme (for example, monitor player progress or make player selection decisions);
- research and statistical analysis (for example into volunteering practices and patterns);
- undertake reasonable profiling of potential donors, including likely ability to make (and interest in making) a donation to the TF, using information available from publicly available sources and potentially engaging trusted third parties to assist us in this work. Please let us know using the contact details below if you would prefer us not to do this, and/or
- undertake appropriate donor due diligence, again using third party sources, before accepting significant donations.

Where the TF relies on legitimate interests as the legal basis for processing personal data, it has considered whether or not those interests are overridden by the interests or fundamental rights or freedoms of the individuals whose data are being processed and concluded that the processing is, on balance, fair.

*Consent.* The TF may also process your personal data on the basis of the consent you give, for example to send you certain direct marketing communications.

*Processing special categories of data.* Where we process sensitive personal data, other legal bases for processing may apply, including where our processing is necessary for the establishment, exercise or defence of legal claims (for example, to protect and/or defend our property or rights, or those of other British tennis stakeholders), for reasons of substantial public interest (for example, to conduct research about player performance), for provision of medical care and treatment, for the purposes of equal opportunities monitoring or where you have otherwise given us your explicit consent (for example, to allow the use of performance players' medical records for performance monitoring purposes, or to share those records with another tennis organisation, or where coaches or officials provide us with data relating to criminal convictions and offences as part of the DBS disclosure process).

## **5. Who we may share your data with**

Personal information collected and processed by us may be shared with the following recipients, or categories of recipients, where necessary:

- Someone acting on your behalf, for example a parent or guardian;
- Our employees and volunteers (as applicable), for the purposes of providing particular products or services to you;
- Competition organisers and officials involved in competitions you are taking part in;
- (Where you are a volunteer) with our employees and other volunteers, for the purposes of volunteer management and administration and any volunteering application or project; and to arrange your accreditation for an event;
- Your local tennis club or county or national tennis association, where relevant (for example, in order to resolve an issue raised by you that your club or county or national association has referred to the TF) as well as third party training course providers whose services you book via the TF;
- The LTA, with whom as national governing body we work closely, and the ITF as the international governing body, and the English Institute of Sport;
- The All England Lawn Tennis Club, which owns and hosts The Championships, Wimbledon (for which the TF receives an annual allocation of tickets), in connection with the provision of ticket-holder benefits and the seeking of ticket-holder feedback, as well as venues hosting TF events and

third parties involved with organisation of such events (for example, so that they can cater for your dietary or access requirements);

- Our contractors and suppliers, where they process personal data on our behalf (for example, IT consultants and hosted software providers); public relations advisers, and legal and professional services providers) and third parties we use to help us provide participation programmes;
- Fulfilment suppliers and our app developer,;
- For performance and other players, members of your support team, other tennis organisations, competition organisers (for the purposes of player selection and event organisation), ratings and rankings organisations such as UTR, individuals on selection panels and third party survey companies (for the purpose of surveying players on their tournament experiences);
- Our research partners;
- The Disclosure and Barring Service, and safeguarding committees and 'umbrella bodies' (for the purpose of carrying out criminal records checks on coaches and officials and others where relevant), HM Revenue & Customs (for tax reporting purposes), the police and/or other competent authorities, as applicable; and/or
- Former employers and other providers of necessary background checks.

Typically, we will not transfer your personal data to countries outside the European Economic Area (EEA). On the limited occasions when this does occur (for example, because your personal data is stored on an IT system hosted outside of the EEA), we ensure that any such transfer meets the requirements of GDPR, for example because it is necessary for the provision of our products or services to you or for the establishment, exercise or defence of legal claims; or is otherwise subject to prescribed safeguards such as 'model clauses' approved by the European Commission. You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us using the details below.

## **6. How long we will store your data**

We may retain your personal data for as long as is necessary to fulfil the purposes set out in this privacy notice and/or our reasonable requirements. On expiry of the relevant retention period, your personal data will be deleted, suppressed or anonymised, as applicable, save that we will retain comprehensive details of player rankings, ratings and results for archiving purposes in the public interest, or historical or statistical purposes, bearing in mind our delegated role from the LTA in relation to disability tennis.

## **7. Your rights in relation to your personal data**

Under the GDPR, you have the right to:

- obtain access to, and copies of, the personal data that we hold about you;
- require us to correct the personal data we hold about you if it is incorrect;
- require us to erase your personal data in certain circumstances;
- require us to restrict our data processing activities in certain circumstances;
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on you; and
- where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

If you would like to exercise any of these rights, please contact us in writing using the contact details below. Please note that these rights are not absolute and we may be entitled (or required) to refuse requests where exceptions apply.

If you are not satisfied with how we are processing your personal data, you can complain to the Information Commissioner's Office (ICO). You can also find out more about your rights under the GDPR (and other data protection legislation) from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk).

## **8. If you do not provide personal data**

In some cases described above, the provision of personal data is a contractual requirement, and/or a statutory requirement if you wish to engage with us in a certain way (for example, where you wish to work as a TF coach or official, and there is a statutory requirement for us to carry out a criminal records check on you, for safeguarding purposes). In those and other cases, if you do not provide us with certain personal data, we may not be able to work with you or provide our products or services to you (as applicable), or it may adversely affect the provision of our services to you.

## **9. Cookies**

Information may be sent to your computer in the form of an internet 'cookie' to allow the TF servers to monitor your requirements. The cookie is stored on your computer. The TF server may request that your computer return a cookie to it. These return cookies do not contain any information supplied by you.

This is necessary to allow the TF to measure the usability of the systems, which will help to improve the user experience of our websites. Your browser software should however enable you to block cookies if you wish to.

## **Contact us**

If you have any queries about this privacy notice or how we process your personal data, you may contact us:

- by email: [privacy@tennisfoundation.org.uk](mailto:privacy@tennisfoundation.org.uk)
- or by post: Data Protection, Tennis Foundation, 100 Priory Lane, Roehampton, London SW15 5JQ

*Published May 2018*