

LTA Tennis notice

LTA Tennis Foundation privacy notice

6 MINUTE READ

This privacy notice explains how the LTA Tennis Foundation ("we", "our", "us", or the "LTA TF") collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data relating to:

- individuals representing applicants for our loans and grants;
- individuals representing beneficiaries of our loans and grants;
- existing and potential donors (and individuals representing donor organisations);
- individual volunteers and applicant volunteers seeking to support our operations and organise fundraising events;
- individuals who participate in a tennis programme funded by us;
- representatives of other charities and our delivery partners; and
- visitors to our website at <http://www.ltatennisfoundation.org.uk>

(together, "you", or "your").

The LTA Tennis Foundation (a company incorporated in England and Wales with company number 08087723, and registered charity number 1148421, and which is registered with the Information Commissioner's Office with registration number ZA621584), is the "controller" of your personal data and is subject to the UKGDPR and the Data Protection Act 2018.

How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before making an application for a loan or grant funding, and when you submit a formal application for a loan or grant;
- from the information you provide to us when you enquire about making a donation, and when you make a donation (for example, via SMS / text message donation, via [our JustGiving page](#), via our website's donation page, or via a more formal route for larger donations);
- when you register to receive our newsletter, which you can do via our website or when you make a donation;
- from the information you provide to us when you enquire about, or seek to apply for, volunteering opportunities or to support our charitable work;

- if you participate in a tennis programme funded by us, we may collect feedback from you about your experience, which may include your personal data;
- from third parties, including:
 - Lawn Tennis Association Limited and its group companies ("LTA", the national governing body for tennis in Britain);
 - public domain sources, including Companies House, the Charity Commission, and other company websites or publications, where we identify that you may be interested in making a donation or otherwise supporting our charitable work (please see below); and
 - from other charities and partner organisations (in order to verify details about you and/or your application for a loan or grant funding and/or your application to volunteer with us, and/or to administer your loan or grant once awarded);
 - when you communicate with us by email, telephone, or via our website or our social media channels, for example in order to make enquiries about a funding application or award, or to enquire about, or apply for, volunteering opportunities;
 - in various other ways as you interact with us during your time as an applicant, a loanee or grantee, a donor, a representative of a partner organisation, volunteer, or a visitor to our website, for the various purposes set out below.

Where you provide us with personal data relating to others (for example, where you are making an application for loan or grant funding on behalf of someone else), we understand that you are authorised to provide that information to us, and that you have provided this privacy notice to them, as appropriate.

The types of information we collect

We may collect the following types of personal data about you:

- contact and communications information, including:
 - your contact details (including email address(es), telephone numbers (including mobile numbers where you make a donation by SMS) and postal address(es));
 - your communication preferences;
 - records of communications and interactions we have had with you, including information provided in email correspondence and through our website or via social media;
 - your interaction with our direct marketing messages (e.g., open rate, click-through rate);

- biographical and career information, including:
 - your name, title, gender, nationality and date of birth;
 - work experience information (e.g., as set out in a CV);
 - availability for volunteer roles;
 - details of your professional activities and employment, including work contact details;
 - your interests and extra-curricular activities, including your involvement in tennis and the level of your engagement with the LTA;
 - health information (e.g., allergies, food intolerances or if special assistance is required to allow you to attend an event or perform volunteer work);
 - information gathered by way of a background check (if working with children or vulnerable individuals in connection with volunteer work);
- video content and photographs recorded from your attendance at our events and/or participation in our volunteer opportunities and LTA TF funded tennis programmes;
- feedback and other information collected from you from your attendance at our events and/or participation in our volunteer opportunities and LTA TF funded tennis programmes (including case studies about your experiences with the LTA TF);
- donations-related financial information, including:
 - your donation history, including gift amount(s), purpose(s), date(s), whether your donation is a one-off or recurring via direct debit, etc.;
 - transaction details and bank account / credit card / PayPal details;
 - tax status and Gift Aid declaration information;
 - details of financial transactions, for example tickets purchased for fundraising events;
 - our assessment of your ability and willingness to make donations, including considerations of income; and
 - donations to other organisations where you have told us or where this is publicly available;
- funding-related financial information, including:
 - information collected by way of the grant funding application process (e.g., income and expenditure, reason for requiring grant funding);
 - transaction details and bank account / credit card / PayPal details;
 - tax status;
- technical data relating to your use of our website, including information collected through the use of cookies and similar technologies;

We may also collect sensitive personal data, for example data revealing racial or ethnic origin, religious beliefs, and information concerning health and medical conditions (for example details of disabilities, allergies, intolerances or other medical conditions), where you have provided this in (a) an application for a loan or grant

funding, (b) an application to participate in volunteer work for us, (c) signing up to attend one of our events or to participate in a tennis programme funded by the LTA TF, (d) where you subsequently provide this information, or (e) where such information is manifestly made public by you.

If we lose touch with you over time, we may use external sources to ensure that our contact details for you are up to date, allowing us to continue to communicate with you about the LTA TF's activities, opportunities for loans and grants, and fundraising campaigns which may be of interest to you. If you do not wish the LTA TF to do this for you, please let us know using the contact details below.

We may also use external sources, such as information you have publicly shared on social media, for the purpose of our monitoring and evaluating how the LTA TF's loan or grant funding awards have been used and will be best used in the future. In collecting this information, we are not intending to process it as personal data but in an aggregated form for the LTA TF's statistical purposes.

How we use your information

The purposes for which we may use personal data (including sensitive personal data) we collect during your association with us are all at their heart designed to further our charitable objectives, which essentially involve investing in people, programmes and places to play, to enable as many people as possible to share in the enjoyment and benefits of taking part in tennis. We do this by:

- reviewing applications for loan or grant funding and assessing their relative merits, including by considering whether the application fits one of our current areas of funding, arranging visits to your premises (in some cases) and by consulting with the LTA and/or third party experts for peer review purposes as part of the LTA TF's loan or grant application process (as applicable);
- reviewing applications to participation in our volunteering activities, including by considering suitability of candidates to the activity and by consulting with third party background check provider(s) to ensure that there are no restrictions or reasons not to allow the involvement of the volunteer;
- updating our website with information about the LTA TF's activities, volunteering opportunities and publishing case studies about participation in LTA TF funded tennis programmes and news items about our loanees and grantees and their impact in the tennis community;
- communicating with you about the LTA TF's activities, opportunities for loans and grants, and fundraising campaigns and volunteering opportunities which may be of interest to you, for example in email newsletters or other marketing communications (such as a thank you message when you donate to us);

- sharing details in respect of any donations related Gift Aid claims with HM Revenue and Customs;
- operation of prize draws and other competitions to promote and generate interest in, and increase awareness of, the LTA TF, as well as seeking donations from entrants;
- 'wealth screening', profiling and research to gain a better understanding of our supporters, inform our fundraising strategy and target our communications more effectively and appropriately;
- considering feedback on our events and LTA TF funded tennis programmes that you have provided, with a view to making any improvements based on your feedback;
- administration, for example in connection with a donation you have made, a volunteering opportunity you have applied to be involved with or a fundraising event you have registered for or attended;
- identifying where personal data obtained by the LTA TF matches information in LTA databases (and de-duplicating that data where required);
- internal record-keeping, including for the management of any feedback or complaints, and for maintaining records of loans and grants we have awarded, other charities and partner organisations we have worked with, and donations we have received.

The legal basis for processing your information and how we use it

We may process your personal data because it is necessary for *the performance of a contract with you or in order to take steps at your request prior to entering into a contract*. In this respect, we use your personal data for the following:

- to interact with you before you make an application for loan or grant funding (for example, to send answer any questions you have about an award);
- when you submit a formal application for an award, in order to assess your eligibility for that award;
- if you are successful in your application, to provide you with an award in accordance with all relevant terms and conditions (and, in this respect, we may process your personal data in connection with any checks to ensure that you are complying with the conditions of your award);
- the promotion and operation of prize draws and competitions, including contacting entrants to seek donations;
- to receive and process donations received from donors;
- to deal with any concerns or feedback you may have; and

- for any other purpose for which you provide us with your personal data in connection with a loan or grant funding application or award, including when you interact with us in accordance with the terms and conditions applicable to the use of our website.

We may also process your personal data because it is necessary for *our or a third party's legitimate interests*. Our "legitimate interests" include our charitable objectives as briefly summarised above. In this respect, we may use your personal data for the following:

- to interact with you before you make an application for a volunteering opportunity (for example, to send answer any questions you have about such opportunity);
- when you submit a formal application for a volunteering opportunity, to assess your suitability for the volunteer role;
- if you are successful in your application for a volunteering opportunity, to provide you with details of the role and activities associated with this;
- the promotion of prize draws and competitions, to generate interest and increase public awareness of the LTA TF;
- to organise, promote, improve and deliver fundraising events, including seeking donations from attendees at events and using feedback from attendees to improve events;
- to monitor and evaluate the performance and effectiveness of our loan and grant awards;
- to improve the efficacy and return on investment of marketing email campaigns, by building profiles of individuals on marketing list and targeting communications based on profiles; and
- for the administration of our website and our social media channels.

We may process your personal data where we have your *consent* to do so. In this respect, we may use your personal data to send you relevant marketing communications to you about the LTA TF's activities, opportunities for loans and grants, volunteering opportunities, and fundraising campaigns that may be of interest to you based on your profile.

Important note: If you do not wish to receive such information, or if you wish to receive this information only by certain means of communication, please let us know now or at any time in the future, and your details will be removed from our mailing list or your communication preferences will be updated, as applicable.

We may also process your personal data where:

- it is necessary to meet our legal and regulatory obligations, or to assist the LTA with its legal and regulatory obligations, for example compliance with

- anti-money laundering laws and tax reporting requirements in connection with donations; or
- it is necessary for the establishment, exercise or defence of legal claims (for example, to protect and defend our rights or property, and/or the rights or property of our loanees and grantees, other charities and partner organisations).

Fundraising-related research, profiling and 'wealth screening'

To ensure that our communications are relevant to you and your interests and to assess your likely ability to make, and interest in making, donations to the LTA TF, we may use additional information such as geographical information and measures of affluence to assist us. This will likely combine publicly available information, for example drawn from company resources and news media, with what you have provided to us, such as past donations and career information. We may use the services of external screening and profiling companies, and publicly available data from social media sites like LinkedIn, Facebook and X, depending on your privacy settings and interaction with us.

We may create fundraising profiles from other personal data that we already hold about you, either from internal or external research. This may be carried out by automated or manual processes (although we do not make solely automated decisions in this respect), and enables us to better understand you as our supporter and make appropriate requests for support. A list of publicly available sources of information used for the purposes detailed above is available on request.

If you do not wish the LTA TF to do this for you, please let us know using the contact details below.

Sharing your information with others

For the purposes referred to in this privacy notice and relying on the legal bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data to a variety of recipients including:

- to the LTA, for example if your application or award for loan or grant funding is linked with a project delivered by the LTA, or to synchronise your data between our systems and LTA systems for marketing and contact purposes;
- to our partner organisations (including other charities and third party experts) where necessary for the assessment of your application, to run any necessary

background checks to ensure suitability for a volunteer role or administration of your award, and for peer review purposes;

- our employees, agents and contractors where there is a legitimate reason for their receiving the information, including third parties where we have engaged them to process personal data on our behalf as part of administering the loan or grant funding application process;
- our service providers who support us with our operations, including our customer relationship management (CRM) system provider and our web donation and competition entry platform provider;
- internal and external auditors;
- when the LTA TF is legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction), for example by the Charity Commission.

International data transfers

As a matter of course, we do not transfer your personal data outside of the United Kingdom and/or the European Economic Area where the LTA TF is based. We may, however, transfer your personal data around the world in the following circumstances:

- your personal data may be hosted on a system provided to us by a third party service provider, who may either host that system on servers outside of the UK / EEA, or they may allow their employees or contractors to access systems from outside of the UK / EEA (for example, to provide us with support outside of UK / EEA working hours); or
- on an *ad hoc* basis, for example where this is necessary for interaction with you, and you are located outside of the UK / EEA (as applicable).

In such circumstances, we will apply any additional measures required in order to give adequate protection for the information when it is transferred outside of the UK / EEA. These measures may include the use of standard contractual terms approved for use in the UK / EEA, which give the transferred personal data the same protection as it has in the UK / EEA. For further information regarding these measures, please contact us using the details below.

How long your information is kept

For unsuccessful applicants (whether for grant funding or volunteer work), we may retain a record of the representative's contact details, proposed project scope, availability to participate in other volunteer opportunities that align with indicated areas of interest, any other charity or partner organisation with whom they are affiliated, and the extent of progress through the application process(es). This record is retained indefinitely for grant funding applicants in the LTA TF's archive for

statistical / research purposes; while records for volunteer applicants are retained [for up to one year following the completion of the volunteer opportunity].

For successful applicants for grant funding, we may retain all award related personal data indefinitely after you have finished complying with all the terms and conditions applicable to your award.

For donors, we may retain details of your ability and willingness to make donations, typically for five years. However, if you wish to be removed from our donor list, please let us know and we will delete your personal data (except for a basic record of your past donation details, for archiving purposes).

Your rights

Under the UK GDPR and the Data Protection Act 2018, you have the following rights:

- To be informed what personal data we hold about you and/or to obtain access to it (i.e. by receiving a copy of it in a permanent form);
- To require us to correct the personal data we hold about you if it is inaccurate;
- To request that we erase your personal data in certain circumstances;
- To request that we restrict our data processing activities in certain circumstances;
- To 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 you 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 your rights; 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.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you are not satisfied with how we are processing your personal data, you can make a complaint to us directly by contacting us at the details below. When you make a data protection complaint, we will:

- acknowledge receipt of your complaint within 30 days;
- take appropriate steps to investigate your complaint, including by making appropriate enquiries within the organisation and with any relevant third parties, without undue delay;

- keep you updated on the progress of our investigation;
- if necessary, request further information from you about your complaint to aid our investigation; and
- provide you with a clear outcome of your complaint.

If you remain dissatisfied after you have received an outcome of your complaint from us, you have the right to escalate your complaint to the Information Commission. You can find out more about your rights under data protection legislation from the Information Commission's website available at www.ico.org.uk.

Contact us

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact us care of the LTA's Customer Support Team:

- via the LTA's website lta.org.uk/about-us/contact-us (please indicate that your message is intended for the LTA Tennis Foundation);
- or by post: att'n: LTA Tennis Foundation c/o the Lawn Tennis Association (Legal Services), National Tennis Centre, 100 Priory Lane, London SW15 5JQ.