



Association of British Tennis Officials (“ABTO”)

Privacy Policy

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1. Introduction

This privacy policy explains how the Association of British Tennis Officials (“ABTO”), (the “Association”), (“we”) or (“us”) of 100 Priory Lane, Roehampton, London SW15 5JQ, collects, uses and shares your personal data in its capacity as a representative association for tennis officials in the United Kingdom. We are required to keep your personal data safe and secure in line with the UK Data Protection Act 2018 (the “DPA”), the General Data Protection regulation (GDPR) as implemented in the UK, and as may be updated from time to time (the “Data Protection Laws”).

2. About this document

This privacy policy sets out the way we process your personal data to make sure you are aware of how we may collect, use and share your personal data as a member of the Association, your rights in relation to it, and how you can contact us or the Information Commissioner’s Office (the “ICO”) if you have any questions or concerns.

References to ABTO members in this policy include Full Members, Honorary Life Members and Associate Members. Only individuals who hold a current Lawn Tennis Association (“LTA”) Official’s Licence are eligible to be Full Members of ABTO. ABTO membership benefits vary according to membership status.

When ABTO members are performing their roles as LTA Licensed Tennis Officials or are otherwise representing the LTA e.g. at tournaments and when serving on LTA Committees or working groups, the LTA privacy policy and arrangements for compliance with Data Protection Laws apply. Tournaments may additionally impose their own data protection requirements. For example, LTA Licensed Tennis Officials selected to officiate at the Wimbledon Championships must accept an Agreement of Selection for the Championships with LTA Operations Limited that includes data protection clauses.

3. Information we collect and why

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- Identity information (basic biographical information including first name, last name, title and gender (if relevant));
- Contact and communications information, (including name, email address(es), telephone numbers and postal address(es), and records of communications and interactions we have had with you);
- Grading, selections and evaluation information as relevant to your officiating role;
- Financial information, including bank account details (for example in connection with administering ABTO expenses and costs); and,

- Certain other information which you volunteer when making use of your membership benefits (for example, details about your career, professional activities, interests and memberships when submitting an election manifesto as part of the Management Committee voting process).

We may also collect special category personal data including information about your health or medical conditions or personal circumstances, where this is relevant to your officiating role or where you have otherwise volunteered this information. For example, so that we can cater for your dietary or access requirements when you attend an Association meeting or event, or so that the Association can represent your interests in connection with LTA officiating matters and committees (for example in relation to selections, grading, grading appeals, or disciplinary).

The presumption is that special category data needs to be treated with greater care because collecting and using it is more likely to interfere with individual's fundamental rights or open someone up to discrimination.

We recognize that certain categories of personal data may be more sensitive than others e.g. it may be obvious and more generally known if an ABTO member has a special diet or has suffered an injury affecting their work rate. However, you should always give careful thought and consideration to any sensitive information that you receive, only use it or disclose it in accordance with the purpose for which it was provided to you, store relevant documentary and electronic records securely and note that:

- Grading, grading appeals and disciplinary committees and processes are the remit of the LTA and are subject to the LTA privacy policy and data retention policy.
- The Grading panel is an ABTO panel made up of ABTO committee members with responsibility for providing review and input to the LTA Grading Committee. Final grading decisions are made by the LTA. The ABTO privacy policy and data retention policy apply.
- The Selections panel is an ABTO panel made up of ABTO committee members with responsibility for providing input to LTA selections of officials for tournaments. Final selection decisions are made by the LTA. The ABTO privacy policy and data retention policy apply.

You may be asked by the LTA or ABTO as applicable to provide express consent where sensitive special category personal data is collected and stored in connection with your officiating role and the association carrying out its legitimate interests. For example, when you provide special category personal data in connection with grading appeals, conduct or disciplinary matters.

4. How we collect your information

We may collect your personal data in a few limited ways, namely:

- Directly from you, when you join ABTO or when you interact with us during your time as a member in various other ways (for example, where you attend ABTO events such as the AGM or participate in training and development activities, or volunteer to become a member of the Management Committee or its working groups);
- From the LTA (for example, where the LTA passes on your details to us in connection with your membership of the LTA Officials Licensing Scheme, eligibility for membership of ABTO or in relation to your officiating); and,
- As may be generated in connection with your officiating role and relationship with us more generally.

Where you provide personal data to ABTO such as your name, title and contact details, the Association is the data controller for the purposes of compliance with Data Protection Laws.

5. How we use your personal data

Personal data provided to us (including special categories of personal data) will be used for the purposes set out at the time of collection and, where relevant, in accordance with any preferences you express.

More generally, we will use your personal data for the following purposes:

- Administration of your Association membership, including informing you about:
 - Membership information and benefits;
 - Management Committee meetings and initiatives including the AGM; and
 - Management Committee elections and voting arrangements.
- Communication about our Association activities, news and events and training and development opportunities that we think may be of interest to you;
- Administration of the ABTO Wimbledon ballot;
- Research, surveys and statistical analysis about the Association and its members;
- Storing your details on the IT platforms we use to administer ABTO operations and communicate with members;
- Where this is necessary for the performance of a contract (including any written terms and conditions relating to your membership) with you;
- Where this is necessary for our legitimate interests in operating the Association or in accordance with all relevant legal requirements. For example:
 - Administering the Association in accordance with its Constitution and objectives;
 - Representing and safeguarding the interests of ABTO and its members;
 - Representing members in all aspects of tennis officiating;
 - Supporting the LTA in the selection, recruitment, training and grading of tennis officials;
 - Managing, controlling and regulating the activities of ABTO and its members in relation to matters not dealt with by the LTA Tennis Officials Licensing scheme; and
 - To administer the funds of ABTO.
- To comply with applicable accounting, legal and regulatory obligations, including record retention.

We may share your personal data with certain third parties for the purposes set out in this privacy policy where this is necessary for our legitimate interests (or the legitimate interests of a third party), and/or where we have your consent, as applicable.

6. Your marketing preferences

ABTO does not conduct profiling or marketing campaigns. We may use your information to offer you services or opportunities that we believe are closely connected to our main purpose and where we have a legitimate interest in working with you. Our communications will generally:

- Be by email or publication on the Officials' section of the LTA website; and,
- Relate to the operation of the Association and your membership.

Certain communications may be flagged or reproduced on the ABTO Facebook page, which is operated in accordance with the ABTO Social Media Policy.

We will always respect your wishes in respect of what type of communications you want to receive from us and how you want to receive them. There are some communications, however, that we need to send to you regardless of your marketing preferences in order for us to fulfil our contractual obligations to you as a member of our Association. Examples of these essential service communications are:

- Records of transactions, such as payment receipts (as applicable for the Wimbledon ballot).
- Membership related mailings such as notices of formal meetings including the AGM and information about uniform requirements and training.

You are in control of how we communicate with you. You can update your choices and/or your contact details by contacting us at ABTOdataprotection@gmail.com.

7. Sharing your information with others

We do not sell or share your personal data with other organisations to use other than as set out below.

Personal data collected and processed by us may be shared with the following member volunteers and third parties, where necessary to carry out our obligations and where it is consistent with the purpose(s) for which the personal data has been collected and is stored by the Association:

- Members of the ABTO Management Committee and appointed volunteers for the purposes of:
 - Administering your membership and giving you access to the membership benefits to which you are entitled;
 - Supporting members in their training and development; and,
 - Representing members in tennis officiating matters.
- The LTA, competition organizers, officials and venues where ABTO members officiate.
- Our contractors and suppliers including, but not limited to, providers of election services, membership management and IT services e.g. UK Engage, Gmail, Dropbox and Eventbrite.
- Our accountants, auditors and legal advisers as applicable.
- When we are legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction).

We typically process and store your personal data in the United Kingdom or the European Economic Area (“EEA”).

Typically, the Association will not transfer your personal data to countries outside the 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), such third party service providers are required to respect the security of personal information and to treat it in accordance with the relevant Data Protection Laws.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted by email; and, any transmission is at your own risk.

8. How long your information is kept

We keep your personal data only for as long as reasonably necessary to fulfil the purpose(s) we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. For most membership data, this means we retain your personal data for so long as you have a valid Association membership. However, certain basic information about our members (including contact, identify, financial and expenses information) may be retained for a period of up to six years after they cease being a member of the Association (where necessary to satisfy any legal, accounting, tax reporting and statutory record-keeping purposes).

9. Your rights

Under the Data Protection Laws, you have a number of rights that can be exercised if you are unhappy with the way your data is being used or wish to know more about the data we hold about you. You can exercise any of these rights by contacting the ABTO Data Protection Contact (details below):

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your data (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

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

You will not have to pay a fee to access your personal data or to access any of the other rights where valid reasons apply. We may review requests on a case by case basis and charge a fee where a request is repetitive or excessive. In order to process a request and exercise your rights, we may request specific information from you to help us to confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one calendar month. Occasionally it could take us longer than a calendar month if your request is particularly complex or you have made a number of requests. In this case we will notify you and keep you updated.

10. Your Duty to Inform us of Changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data and contacts change during your membership of ABTO.

11. How to Contact ABTO

ABTO is the Data Controller who determines how your data is processed and can be contacted at:

ABTOdataprotection@gmail.com

12. Your Right to Contact the ICO

If you have a concern about the way that ABTO is processing your personal data, or you feel that ABTO is unable or unwilling to resolve your information rights concern and you are not satisfied with the response received, you have the right to lodge a complaint with the ICO. You can find more information on your rights under Data Protection Laws and to complain to the ICO on the ICO website at www.ico.org.uk or by telephoning the ICO on 0303 123 1113.

**The Association reserves the right to modify this privacy policy and to update it at any time.
Please check the Officials' section of the LTA website for the current privacy policy.**

**If you require this document in any other format, please contact the ABTO Data Protection Contact
Email: ABTOdataprotection@gmail.com**