

# External Privacy Notice

## Tennis Wales LTD

### 1. Introduction and about us

This privacy notice explains how TWL ("Tennis Wales Limited") collectively referred to in this privacy notice as "TWL" (or "we", "our", "us") – collects, uses and shares your personal data as the national governing body for tennis in Wales.

How we use your personal data depends on whether you interact with us as a Company Member, LTA Member, a player, a coach or official, a volunteer, a ticket buyer, park member or other customer, as a user of our websites ([www.lta.org.uk/about-us/in-your-area/tennis-wales/](http://www.lta.org.uk/about-us/in-your-area/tennis-wales/)), [Tennis Wales In The Park / Home \(lta.org.uk\)](http://www.lta.org.uk/tennis-wales-in-the-park/), [Home - Tennis Wales Coach Development Centre \(tenniswalescoaching.org.uk\)](http://www.tenniswalescoaching.org.uk/) or in some other way. This privacy notice gives a general overview of how TWL processes 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.

TWL which is registered with the Information Commissioner's Office under registration number Z9637880, is the primary 'data controller' of your personal data for the purposes set out below or 'data processor' of information provided by other related organisations such as the Lawn Tennis Association, Sport Wales, Tennis Foundation, Disability Sport Wales and others. TWL is subject to the General Data Protection Regulation (the "GDPR") with effect from 25 May 2018.

### 2. The categories of personal data we collect

TWL collects and processes 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 or guardian's contact details (for example, for participants who are children, where TWL 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).

Personal data processed by TWL also includes: information relating to matters arising under or in connection with the LTA Disciplinary Code (including safeguarding, anti-doping and disciplinary issues) including about investigations and their outcome; information collected by TWL and/or LTA's surveys; proof of identity (where required) and marketing preferences, including as expressed by you (or as indicated by information we obtain from others).

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

*For Company Members:*

- Basic contact details as listed above

*For LTA Members:*

- Membership details (including LTA Membership number, start date / expiry date and venues currently or previously linked to);
- Rankings and ratings;
- Any membership benefit redemption details;
- Competitions and prize draws entered;

- National Union Students (NUS) number / student details (if applicable); and/or
- Responses to surveys.

*For customers including ticket buyers/award nominees and nominators/job applicants*

- Delivery address for products or services, including purchased tickets; (if applicable)
- Payment information and details of returns or refunds, where relevant; (if applicable) and/or
- Dietary requirements, access requirements and proof of ID, where relevant for attending LTA/TWL events (if applicable)
- Supporting documentation including work experience, training and education for job applicants and achievements for award nominees

*For players:*

- Performance, match-play (including details relating to competitions entered, match results and information collected by courtside technology) and training-related data;
- Rankings and ratings;
- Availability, selection and travel information;
- Dietary requirements and other information relevant for training or competition arrangements;
- Medical records, injury information and other health related data;
- Codes of Conduct;
- Participation including court and course bookings.

*For coaches and officials:*

- Accreditations, qualifications and training;
- Availability, selection and travel information;
- Evaluations and assessments of coaches, officials players and/or matches;
- Disclosure and Baring Service (DBS) information, (criminal records checks), where applicable; and/or
- Codes of Conduct.

*For volunteers:*

- Accreditations, qualifications and training;
- 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 and DBS checks;
- Availability information;
- Codes of Conduct.

*For board and/or committee members (same as volunteers plus):*

- CV/nomination details;
- Background information and photo for the website;
- ID for auditing purposes;
- Declarations of Interest;
- Codes of Conduct.

*For Tennis Wales in the Park Members:*

- Name, date of birth, gender, contact details including address, telephone number and email address;

- Group member details if subscribing for an annual membership as a group or family;
- Payment details are not accessible to Tennis Wales.
- Court bookings

Our administration of Welsh tennis may also require us to process special category data (including data relating to racial or ethnic origin, religious beliefs, health and sexual life) and/or data relating to criminal convictions and offences (together "sensitive personal data").

### 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 apply for job vacancy, purchase our products or services including park membership, pay and play, tournament tickets, attend TWL events, enter a competition, join a performance programme as a player, provide coaching or officiating services, and make general enquiries, and when you interact with us during your participation in Welsh tennis in various other ways;
- From someone else acting on your behalf, for example when a parent or guardian has entered you as their child into a competition, when a ticket buyer names you as their guest at a TWL event, when a coach or official provides performance or results data to TWL on behalf of a player, or when TWL 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
- When you make enquiries, 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 newsletter, enquire about a volunteering opportunity), or through the club annual registration process and when your details are passed to us for the purposes of volunteer recognition.
- From third parties you are connected to, for example:
  - If you have expressed an interest in receiving information from TWL or LTA membership scheme through certain third parties;
  - If you are nominated for an LTA or Tennis Wales award or for other recognition;
  - From entities such as SERVES where you have given your details to tennis 'activators' as part of tennis programmes or community groups;
  - If you are named as a contact on an invoice or as part of a payment process;
  - If you have booked a court through, or otherwise interacted with, the ClubSpark platform;
  - From your interactions with TWL accounts on third party platforms, including for example, Facebook, Twitter, Instagram, Tik Tok and YouTube (for example when you express an interest in TWL by clicking 'Like' or commenting on one of our posts);
  - From national academies, regional and local development centres and other entities working with the TWL or LTA Performance team;
  - When your details are provided to us through the LTA for tennis in Wales purposes.

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

*Performance of contracts.* TWL 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 terms and conditions relating to your Company Membership, the purchase of products or services including tickets, funding and player support agreements with players, services contracts with coaches and officials, volunteer agreements and the terms and conditions applicable to the use of our website.

*Compliance with our legal obligations.* In some cases, TWL needs to process your personal data in order to comply with its 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 about our financial arrangements with third parties to HM Revenue & Customs and assist with investigations by police and/or other competent authorities.

*Legitimate interests.* In other cases, TWL has 'legitimate interests' in processing personal information about individuals we interact with. We have many such interests, including commercial interests and those with a wider public benefit. In essence, our principal legitimate interests are in pursuing our mission to get more people playing tennis more often and administering Welsh tennis in a way that promotes and safeguards the integrity of the sport. For example, we need to process personal data in pursuit of our legitimate interests in order to:

- organise competitions and events, and process and publish results, ratings and rankings data from competitions;
- market TWLs/LTAs products and services (including tickets, performance and participation programmes, coaching courses and events), and promote tennis across Wales more generally;
- ensure the security of TWL/LTA events and premises, including by recording individuals' photographs as part of event accreditation processes and capturing individuals' images using CCTV monitoring;
- operate a customer services team by processing queries, complaints and other information received, conduct surveys and seek advice from advisers with the aim of improving TWL and Welsh tennis as a whole;
- keep appropriate records of players, coaches, officials and volunteers;
- administer and undertake disciplinary, safeguarding, licensing, accreditation, anti-corruption, anti-doping and other regulatory and governance functions (including exercising any right, power or authority in terms of the LTA Competition Regulations or the LTA Disciplinary Code), including any review, process and/ or other involvement by the Designated Role Holders, and keep records in relation to or connection with the same, including of any decisions made in respect of these functions;
- administer our performance programme (for example, monitor player progress or make player selection decisions);
- structure TWL office in Cardiff, storing most personal data centrally and making use of certain software and/or cloud storage providers for the purposes of efficient, fast and secure access to personal data; and
- research and statistical analysis (for example into volunteering practices and patterns).

Where TWL 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.* TWL may also process your personal data on the basis of consent you give, for example when registering for a course, competition or event, signing up for Tennis Wales in the Park and to receive 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 Welsh tennis stakeholders), for reasons of substantial public interest (for example, to conduct research about player performance, to conduct safeguarding investigations and hearings), 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 TWL 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;
- Tennis venues, in order to carry out necessary administration and management functions;
- The LTA and other national associations, where relevant, in order to provide those associations with contact details and other information about, for example, venue welfare officers and other key venue contacts, coaches, volunteers, officials, LTA members, players who take part in competitions, and individuals who attend TWL events, as well as information relating to participation on courses and at venues, playing statistics, the delivery of performance programmes, records of player rankings and ratings, details about customers including ticket buyers, and disciplinary and safeguarding related information for the overriding objective of creating safer environments;
- Third party training course providers whose services you book via TWL (and, where relevant and appropriate, we may share individuals' contact details with coach development centres or other training course providers);
- The All England Lawn Tennis Club, LTA or any of its related entities, which owns and hosts The Championships, Wimbledon (from which TWL request an annual allocation of tickets), in connection with the provision of ticket-holder benefits and the seeking of ticket-holder feedback.
- Our contractors and suppliers, where they process personal data on our behalf (for example our IT is managed by the LTA, Clubspark manage the process of bookings for Tennis Wales in the Park);
- Our key partners including the LTA, Sport Wales, Tennis Foundation and Disability Sport Wales for purposes of delivering the relevant activity;
- For players and support team on group or team trips, other relevant tennis organisations such as the LTA and ITF, competition organisers, including Sport Wales (for the purposes of player selection and event organisation), ratings and rankings organisations such as UTR, and individuals involved on Tennis Wales selection panels.
- For individuals who have signed up for a course via the Tennis Wales Coach Development Centre, your details will be shared with relevant course tutors, awarding body, the website management company and the LTA for the purposes of delivering the service, providing certification and for coach/official record of development.
- DBS 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, local authorities (including any local authority designated officer ("LADO")) and/or other competent authorities, as applicable;
- Designated Role Holders, professional advisors, investigators and experts with suitable experience as required to carry out disciplinary, safeguarding, licensing, accreditation, anti-corruption, anti-doping and other regulatory and governance functions;
- Social media platforms, including Facebook, so that we can engage with you via your Facebook or other social media accounts, including by tailoring the advertisements you see on Facebook based on what we know about you and your particular tennis related interests, and to help us find other Facebook users similar to you who may be interested in what TWL has to offer;
- Former employers and other providers of necessary background checks.

Typically, TWL will not transfer your personal data to countries outside the European Economic Area (EEA) or the UK. 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 or the UK i.e Google Docs), we ensure that any such transfer meets the requirements of GDPR, or the transfer is otherwise subject to prescribed safeguards such as the 'Standard Contractual Clauses' approved by the European Commission. Where we make more regular and/or larger scale transfers of personal data outside the EEA or the UK, we will assess the adequacy of the protections in place for that data to ensure the transfers are lawful. You can obtain more details of the protection given to your personal data when it is transferred outside the EEA or the UK 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 the TWL's 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 role as the national governing body for Welsh tennis.

We may retain recordings or transcripts of disciplinary, safeguarding and other hearings. We may also retain a safeguarding related 'flag' on our internal records (which is only visible to certain members of staff on a 'need-to-know' basis) which indicates when an individual has been involved in a safeguarding incident, regardless of the outcome.

## **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 or complete a Subject Access Request Form available on our website should you wish to access information held. 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 TWL in a certain way (for example, where you wish to work as a 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**

For information about how TWL uses 'cookies' on our website(s), please see the LTA [cookies policy](#).

### **Contact us**

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

- by email: [tenniswales@tenniswales.org.uk](mailto:tenniswales@tenniswales.org.uk)
- or by post: Data Protection, Tennis Wales Ltd, Space 2B at The Maltings, East Tyndall Street, Cardiff, CF24 5EA.