

## Privacy Notice for COVID-19 – ITF tournaments and events

This Privacy Notice serves as an addendum to all ITF Privacy Notices available on the [ITF website](#). This Privacy Notice explains how and why the ITF collects and processes your personal data specifically in relation to the COVID-19 (coronavirus) pandemic.

### 1. Updates to processing activities at ITF tournaments and events

In order for ITF tournaments, events and activities (“ITF Events”) to resume and continue to be delivered, the ITF must change its delivery strategy to protect participants and the wider public from exposure to COVID-19.

If you choose to attend an ITF Event, we will ask you for specific personal data that you would not normally supply and have not previously supplied to the ITF. The provision of this information will help us manage the prevention of COVID-19 at ITF Events and so support a safe return to competitive tennis.

The information that we will process about you in response to COVID-19 will be no more than is necessary to determine whether you may have been exposed to or may be suffering from COVID-19.

### 2. The types of personal data that we may process

#### A. Pre-event

Prior to your participation in an ITF Event, you will be required to complete a Participant Declaration. If you do not agree to or fail to complete the Participant Declaration, you will not be permitted on-site. The Participant Declaration will be sent to you as an online link; players and team members will be sent the link via their National Association; all other participants will receive the link via email from the Tournament Organiser/Host Nation or the ITF. The Participant Declaration will capture the following personal data:

- a. your full name and signature;
- b. your email address and telephone number;
- c. the ITF Event that you are participating in; and
- d. your affiliation to tennis (player, coach, official, support personnel, tournament staff).

#### B. On-site

Each day that you attend an ITF Event, you will be asked whether you are presenting any symptoms of Covid-19. Your responses will not be recorded. However, if you are experiencing any Covid-19 symptoms you may not be permitted entry on-site. You will also be required to undergo a daily temperature reading using a non-contact infrared thermometer. Your temperature reading will not be recorded. However, if your temperature is measured above the threshold, you may not be permitted entry on-site.

During an ITF Event, you may be identified as a close contact of an individual who has tested positive for Covid-19. If you are deemed a close contact, your personal information, including your limited health information may be processed in order for the ITF and/or the local health authorities to conduct appropriate contact tracing.

#### C. Post Event

You may be contacted after an ITF Event if it transpires that you have been identified as a close contact of an individual who has tested positive for Covid-19. You are also expected to contact the ITF if you start presenting symptoms in the 14 days after an ITF Event.

### 3. Lawful basis for processing your personal data

The COVID-19 pandemic has created a global public health crisis in which the tennis industry has been significantly impacted. We recognise that ITF Events must resume in order for tennis players and other professionals in the tennis industry to resume earning a living. However, given the interactive nature of tennis, the sport cannot resume unless appropriate health checks and balances are in place to mitigate the risk of the spread of COVID-19 and to protect the health and safety of tennis participants.

**Legitimate Interest** (see GDPR Article 6(1)(f)): We consider that it is necessary to process your personal data in order for tennis to resume and for the ITF to resume carrying on its primary business functions. Such processing is in our legitimate interest and the interests of our tennis partners and all stakeholders in the tennis industry.

**Public Health** (see GDPR, Article 9(2)(i)): Moreover, processing your special category data at ITF Events is in the public interest for reasons of public health. ITF Events are by their nature, international. Where the ITF collects your health information (i.e. for contact tracing purposes), the ITF considers it is necessary to collect such personal data to protect against domestic and cross-border threats to public health.

### 4. How we will collect your personal data

Your personal data will be collected (i) online, when you complete the Participant Declaration; and (ii) on-site at an ITF Event. Online: The Participant Declaration has been created by the ITF using Formstack. Formstack is a secure productivity platform that enables businesses to build custom forms and collect data. On-site: Your daily temperature reading shall be taken by the ITF Event's designated COVID-19 Officer or his/her designee.

**Each day that you attend an ITF Event you will be asked whether you are experiencing any Covid-19 symptoms and you will be required to submit to a body temperature reading. None of this information will be recorded.**

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

Your attendance at an ITF Event will be recorded by the designated COVID-19 Officer and that information will be transferred to the ITF at the conclusion of each day of the ITF Event. Your personal data shall be stored in the ITF's secure database hosted in the United Kingdom. By reason of you completing the Participant Declaration, your limited personal data may be processed by Formstack, which is based in the United States. For information about what personal data Formstack collects and where that personal data may be hosted, please click [here](#).

The ITF may share your personal data, including any health data collected on-site with other tennis governing bodies inside and outside the European Economic Area (including without limitation: the Association of Professional Tennis (ATP); the Women's Tennis Association (WTA), the Grand Slam Board, the International Olympic Committee and the International Paralympic Committee). The ITF may also share your personal data with the organisers of other ITF Events and local government / health authorities. The ITF will only share your personal data with these third parties if the ITF has reason to believe that you risk exposing or have exposed individuals in the tennis (or local) community to COVID-19 and for contact tracing purposes. Where your personal data is transferred outside the EEA, appropriate safeguards will be imposed so that your personal data is properly protected.

If the ITF becomes aware that you may have been exposed to COVID-19 at an ITF Event, the ITF may use your personal data for contact tracing purposes, e.g. to contact you and advise you to seek medical assessment, or otherwise to advise others that they have been identified as your close contact and that they might need to seek medical assessment. Only your very limited personal data will be shared in this scenario (e.g. your name and the fact that you may have been exposed to Covid-19).

## 6. How long we may keep your personal data

The ITF will only keep your personal data for as long as is necessary to manage the risk of COVID-19 at ITF Events, including to administer the ITF's contact-tracing procedure, and in any event no longer than sixty (60) days.

## 7. Your Rights

You have a number of rights in relation to your personal data. Please refer to the ITF's other Privacy Notices or see [Chapter 3 of the GDPR](#) for more information. If you have any concerns about how we handle your personal data in respect of COVID-19 you may contact us at [dataprotectionofficer@itftennis.com](mailto:dataprotectionofficer@itftennis.com) or you may lodge a complaint with the Information Commissioner's Office via [www.ico.org.uk](http://www.ico.org.uk).

**The ITF will keep its processing activities for the purposes of COVID-19 under constant review. We will notify you of any changes to our processing activities and will update this Privacy Notice accordingly.**