

**NATIONAL
POLICY**



**PRIVACY
POLICY**

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PRIVACY POLICY

1. Purpose and Application

- 1.1 Tennis Australia Limited (**Tennis Australia**) is the governing body of tennis in Australia. Tennis Australia organises a number of tennis events including, without limitation, the Australian Open and Australian Open lead in events. Tennis Australia also manages and promotes various tennis programs, including without limitation, Tennis Hot Shots, Cardio Tennis and the Free Tennis Days. Padel Australia Limited (**Padel Australia**) is a subsidiary of Tennis Australia and the governing body of padel in Australia.
- 1.2 In its roles as the governing body of tennis and padel in Australia, Tennis Australia and Padel Australia are committed to protecting your personal information in accordance with the Australian Privacy Principles as set out in the *Privacy Act 1988 (Cth)*. If you do not agree to the terms of this Policy, we recommend you stop using the applicable Website or App (as defined in section 4.2 below) or do not engage with the applicable ATO (as defined below).
- 1.3 In Australia, tennis programs, events and activities are implemented and conducted by a number of different tennis organisations across the country. Accordingly, Tennis Australia has developed this Policy to apply to each Australian Tennis Organisation (**ATO**) as detailed below.
- 1.4 For the purpose of this Policy, each of the following is an **ATO**:
- (a) **Tennis Australia**;
 - (b) **Padel Australia**;
 - (c) **The Australian Tennis Foundation**;
 - (d) **Member Associations**, being the governing body of tennis in each Australian State and Territory known as Tennis ACT, Tennis Victoria, Tennis New South Wales, Tennis Queensland, Tennis NT, Tennis West, Tennis SA and Tennis Tasmania;
 - (e) **Affiliated Organisations**, being those organisations (other than Member Associations, Regional Associations and Affiliated Clubs) that are affiliated to Tennis Australia or a Member Association from time to time in accordance with the Tennis Australia or Member Association constitution (as the case may be);
 - (f) **Regional Associations**, being those regional or metropolitan tennis associations that are members of, or affiliated to, a Member Association;
 - (g) **Affiliated Clubs**, being those tennis clubs that are a member of or affiliated to a Regional Association and/or Member Association; and
 - (h) **Tennis Australia and Padel Coach Members**, being those coaches that are Tennis Australia Coach Members or Padel Australia Coach Members.

- 1.5 Tennis Australia may disclose your personal information to another ATO, and ATOs may disclose your personal information to Tennis Australia or other ATOs. Each organisation will collect and use your personal information in accordance with this Policy.
- 1.6 This Policy describes how ATOs may collect, hold and use personal information. By providing your personal information to an ATO, you consent to its use, storage and disclosure in accordance with this Policy.
- 1.7 It is important to note that only tennis organisations that are affiliated with Tennis Australia can be an ATO. If you choose to deal with a non-affiliated tennis organisation, this Policy will not apply.
- 1.8 Tennis Australia may, from time to time, review and update this Policy to adapt to changing business practices, and to take into account new laws and technology. The use, storage and disclosure of all personal information held by an ATO will be governed by the most recent Policy, as posted at <http://www.tennis.com.au/privacy>. Tennis Australia will notify you of any amendments by posting an updated version of this Policy on the Website. This Policy was last updated on 14 March 2023.

2. What personal information may be collected about you?

- 2.1 The kinds of personal information that an ATO collects about you depends on the purposes for which the information was collected and is required (examples of those purposes are given in section 5 of this Policy). Examples of the types of personal information an ATO may collect are:
 - (a) contact information, such as your name, phone numbers, address details, email address and social media details (for example, your Facebook name, or Instagram handle);
 - (b) your date of birth, age, gender, tennis rankings and results;
 - (c) details of tennis or padel programs that you have participated in and the organisations that you have participated with;
 - (d) details of a disability you may suffer, if you elect to provide that information to allow the ATO to provide you with relevant services, information and assistance;
 - (e) details of your cultural background, nationality, and language(s) spoken, if you elect to provide that information to allow the ATO to provide you with culturally sensitive information, services and assistance;
 - (f) copies of communications between an ATO and you;
 - (g) information regarding any outstanding payments owed by you to an ATO;
 - (h) your payment details, if you apply for membership, purchase of goods or services from, or make other payments to, an ATO or their agents, licensees or contactors;

- (i) details of your academic qualifications, results, professional interests, reference checks, car registration and drivers licence details (if applicable), if you apply for employment or volunteer positions with an ATO or where otherwise in connection with an investigation conducted by the ATO;
- (j) background checks, including reference checks, police checks, working with children checks and completed member protection declarations and related documents. This personal information may be obtained and retained by an ATO as necessary if:
 - (i) you apply for, and/or obtain employment or a volunteer position;
 - (ii) you apply for and/or obtain Tennis Australia or Padel Australia Coach Membership;
 - (iii) you are proposing to, or provide certain services to an ATO;
 - (iv) you apply for and/or obtain accreditation at a tennis event;
 - (v) you are a tennis or padel player participating in one of our programs or a tennis or padel tournament, competition or event;
 - (vi) you are involved in a matter or investigation conducted by the Tennis Integrity Unit or an ATO; or
 - (vii) appropriate in the circumstances to obtain background checks in relation to you before entering into contracts, arrangements or understandings with you, or entities related to you;
- (k) medical information and emergency contact details. For example, this information may be held about you if you are a tennis player and/or have elected to participate in fitness or sporting activities, such as Cardio Tennis;
- (l) non-personally identifiable information, such as your IP address, browser type, web pages visited (that may, if combined with other information, be personal information); and
- (m) other personal information provided voluntarily by you. For example, this could be information provided by you in response to ATO surveys or competitions.

3. How is personal information collected?

3.1 Generally, an ATO will collect personal information directly from you. For example, an ATO may collect personal information:

- (a) provided by you, if you:
 - (i) are a tennis or padel player;

- (ii) attend a tennis or padel activity or event and participate in activities during that event;
 - (iii) purchase a ticket or a corporate hospitality package to a tennis or padel event from an ATO or an authorised agent or licensee;
 - (iv) purchase merchandise, or other products or services, from an ATO or an authorised agent or licensee;
 - (v) are a Tennis Australia or Padel Australia Coach Member, Tennis Hot Shots deliverer and/or Cardio Tennis deliverer;
 - (vi) wish to apply for employment at, or volunteer for, an ATO;
 - (vii) wish to provide services to an ATO;
 - (viii) enter a competition or promotion being conducted by an ATO;
 - (ix) engage with an ATO via email, telephone, mail or social media;
 - (x) elect to receive tennis related newsletters or other information;
 - (xi) submit information to an ATO in an application or consent form, survey, feedback form, incident report or complaint; or
 - (xii) when you enter your personal information, or consent to your personal information being entered into, one of Tennis Australia's online IT systems or an IT system managed by another ATO (**IT Systems**),
- (b) when you engage with an ATO in the course of it providing and delivering tennis related services, operations and other activities, including automatically when you use one of Tennis Australia's websites or mobile applications (for example, <http://www.tennis.com.au/>, <http://www.ausopen.com>, <http://cardiotennis.com.au/>, <http://hotshots.tennis.com.au/>), <http://www.padel.org.au/>, or a website or mobile application managed by another ATO (collectively, the **Websites and Apps**); and
- (c) that is given to it by another ATO or a third party in the course of its business. Examples of such third parties include the International Tennis Federation (ITF), Women's Tennis Association (WTA), Association of Tennis Professionals (ATP), the Australian Institute of Sport (AIS), the Australian Olympic Committee (AOC), the International Tennis Integrity Agency (ITIA), Universal Tennis (UTR), non-affiliated tennis organisations, Tennis Australia or Padel Australia Coach Members, schools who take part in Tennis Australia or Padel Australia programs, or law enforcement and regulatory bodies.

You can choose not to provide an ATO with some or all of the personal information that it requests. However, this may affect how an ATO can communicate with you and provide its products and services to you, as well as your ability to participate in the ATO's programs and apply for employment or volunteer positions with an ATO. If it is unreasonable or impracticable for an ATO to deal with you where you have not provided the information or consents that it requests, it may have no realistic option but to decline to do so.

- 3.2 An ATO will generally collect personal information regarding a child under the age of 16 years from the parent or other 'responsible person' associated with that child. At times an ATO may collect personal information regarding an adult from another 'responsible person' associated with that adult.
- 3.3 Padel Australia may also collect personal information from padel organisations that are members of Padel Australia's 'partnership program'. Any personal information provided to Padel Australia by padel clubs and operators will be handled in accordance with this Policy.

4. Information collected via the Websites and Apps

- 4.1 When you visit and browse a Website or use an App, an ATO and the relevant Website host or App may collect and store certain types of information about your use of the Website or App (including automatically), to provide with you with the Website or App's functionality, and for other purposes, as detailed below.

Clickstream Data & Cookies

- 4.2 An ATO may use clickstreams, as well as cookies, pixels and other similar technologies to recognize your browser or device, so that we can monitor which parts of our Websites and Apps are most frequently visited, to administer, maintain and improve their performance and to better understand what is of interest to you and our audience, including to personalise your experience. For example, the information may include:
 - (a) the number of users visiting the Website or App and the number of pages viewed by our users;
 - (b) the date, time and duration of your visit;
 - (c) the unique identifiers of your device (such as your IP address or mobile device identifier);
 - (d) your browser software; and
 - (e) the path you take through the Website or App.
- 4.3 If you access our Websites or click-through an email we send you, a cookie may be downloaded onto your device. Cookies may recognize your browser or device but will otherwise not identify you, your email passwords or your bank account details.

- 4.4 You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.
- 4.5 If you disable the use of cookies on your web browser, or remove or reject specific cookies from the Websites or linked sites, then you may not be able to access all of the content and facilities in those Websites, and it may prevent us from recognising when you visit a Website and presenting information we think would be of interest to you.

5. How can an ATO use and disclose the personal information it collects about you?

- 5.1 An ATO may collect and use your personal information to conduct and administer its operations and to provide, improve and market its products and services. Examples of the ways in which an ATO may use your personal information include:
- (a) to provide you with products or services you have requested;
 - (b) to verify your identity and reduce the likelihood of duplications in IT Systems and Websites and Apps, to provide you with a better individual experience;
 - (c) to complete and retain background checks where necessary;
 - (d) if you work in the tennis and padel industries, to provide prospective customers with your contact details for the purposes of offering your services, including if you are a Tennis Australia or Padel Australia Coach Member, listing your contact details listed on the Websites and other promotional materials (with your consent);
 - (e) to develop, run, and administer existing and new competitions, programs, activities and other events;
 - (f) to provide and maintain rankings systems;
 - (g) to share player information with the ITF, WTA, ATP, Australian Olympic Committee, Sport Australia, the International Padel Federation and other relevant bodies;
 - (h) to organise medical treatment;
 - (i) to administer, manage and improve the Websites, Apps and IT Systems, to provide you with access to those Websites, Apps and IT Systems, and their functionality, such as linking to and viewing the profiles of your family connections or viewing your competition schedule in Competition Planner;
 - (j) to assist other ATOs as is reasonably necessary for their functions or activities, or their legitimate interests, including to manage your relationship with ATOs (for example, disclosing information about your financial standing with an ATO where necessary like whether you are a financial member);

- (k) to implement and administer Tennis Australia's other National Policies, copies of which are available on Tennis Australia's website at <https://www.tennis.com.au/about-tennis-australia/reports-and-policies/policies>;
- (l) to disclose to an ATO's professional advisers, including accountants, auditors and lawyers, or insurers or insurance brokers, when necessary or appropriate;
- (m) to assist law enforcement and regulatory bodies, when necessary or appropriate;
- (n) for direct marketing communications by way of post, email, text message or any other electronic means from an ATO about products, including services, event tickets, merchandise and special offers made available by either an ATO or their corporate partners, licensees, sponsors, suppliers and broadcasters, if you have consented to receive such communications or would reasonably expect to receive such communications;
- (o) where permitted by an ATO, to enable third party corporate partners, licensees, sponsors, other ATOs, suppliers and broadcasters who have a relationship with an ATO, to market and promote their products and services to you by way of post, email, text message or any other electronic means if you have consented to receive such communications or would reasonably expect to receive such communications; and
- (p) to personalise your experience with an ATO, including to display online interest-based advertising (sometimes referred to as personalised or targeted ads) for products, services and events that may be of interest to you.

5.2 If an ATO sends you a direct marketing message, you will be able to opt-out at any time, by using the 'unsubscribe' or other similar feature included on all electronic marketing communications or contacting the ATO in accordance with section 8 below.

5.3 An ATO may have contractual relationships with third-party suppliers and service providers who assist or partner with the ATO. For example, IT vendors who develop, test and maintain IT Systems, Websites and Apps, medical consultants who provide medical services at events, corporate partners and sponsors who support the ATO's activities, or individuals who carry out research, or the compilation or analysis of statistics, relevant to the ATOs (**Third Parties**). These Third Parties are granted access to your personal information only as needed to supply products and services to the ATO. Third Parties may be located outside Australia (for example, in Belgium, China, France, Germany, Hong Kong, the Netherlands, Singapore, the United Kingdom and the United States of America). Other than as described below, an ATO will require a Third Party to protect your personal information under their contract with the ATO, including appropriate confidentiality provisions and requirements to comply with Australian privacy laws.

5.4 Like many other organisations, an ATO may also provide information to third parties who serve advertising on websites or apps that an ATO does not operate, or who provide online marketing platforms (including via social media). This information is shared so that we can serve you with more useful and relevant advertising, and to measure its effectiveness. An ATO will not generally share your name or other information that directly identifies you. Instead, an ATO will use its best endeavours to ensure that the information provided for this

purpose is encrypted or an advertising identifier such as a cookie or device identifier is used. At times, these providers may be located outside of Australia including in countries like the United States. You may have rights against those parties under overseas privacy laws, but the providers may not be subject to Australian privacy laws. You may be able to opt-out or control how advertising is displayed to you on those third-party websites or services by adjusting your advertising preferences directly on those websites or services.

5.5 An ATO may also disclose your personal information to an international organisation if you are involved in a tournament sanctioned by that international organisation (for example the International Tennis Federation based in the United Kingdom).

5.6 An ATO will not otherwise disclose or use personal information without your consent, unless the disclosure is:

- (a) in accordance with this Policy or any agreement with you; or
- (b) required or authorised by law, including the Australian Privacy Principles as set out in the *Privacy Act 1988 (Cth)*.

6. Security and retention of personal information

Security Measures

6.1 Each ATO aims to keep your personal information secure. Any personal information that is collected via a Website or App or which is held on an ATO's IT System is protected by appropriate technical and organisational measures, which may include firewalls, strong data encryption, intrusion detection, two factor authentication and prevention systems and the separation of data.

6.2 To give you further comfort that we value the protection of your personal information, we implement further appropriate technical and organisational measures for your benefit, for example;

- (a) limiting physical access to our buildings and venues and user access to our IT Systems only to those we believe are entitled to be there, or on a "need to know" basis;
- (b) proactive monitoring of our IT Systems; and
- (c) using industry standards to support the maintenance of robust information security management systems,

however, no server is guaranteed to be 100% secure and unauthorised access may occur, despite us taking all reasonable steps.

Retention

6.3 We will keep your personal information for the purposes set out in this Policy and in accordance with applicable laws. We will not retain your personal information for longer

than is necessary. If an ATO has no further need for your personal information, it will take reasonable steps to de-identify it or will remove it from its IT Systems and destroy all record of it.

7. How to correct and access personal information

- 7.1 If you provided your personal information via an IT System, Website or App, you can update your personal information at any time by logging onto the relevant IT System, Website or App and submitting the updated information. Alternatively, you can contact an ATO in accordance with section 8 to request that the ATO updates or corrects the personal information held about you.
- 7.2 You may be entitled to access personal information that an ATO holds about you. You can request access to the personal information by contacting that ATO in accordance with section 8. The ATO may charge a reasonable fee to provide you with access (although we will let you know what the fee is before we grant you access). There may be some legal or administrative reasons to deny access. If an ATO refuses your request to access your personal information, it will provide you with written reasons for the refusal where reasonable to do so.

8. Who to contact about privacy matters

- 8.1 Each ATO is responsible for protecting the personal information that it holds about you in accordance with this Policy. If you have any queries, we recommend contacting the relevant responsible ATO directly in the first instance.
- 8.2 If you:
- (a) would like to access the personal information that Tennis Australia or an ATO holds about you;
 - (b) have a complaint;
 - (c) would like to exercise your rights in relation to your personal information, for example:
 - (i) to correct inaccurate personal information we hold about you;
 - (ii) to restrict our use of your personal information, if applicable;
 - (iii) to delete your personal information in certain circumstances; or
 - (iv) to receive personal information an individual has provided TA in a structured, commonly used, machine-readable format, in certain circumstances,

or simply require further information about this Policy, you can contact Tennis Australia's Privacy Officer either:

- (a) by email to: privacy@tennis.com.au; or

- (b) by writing to: Privacy Officer, Tennis Australia, Private Bag 6060 Richmond Victoria 3121 Australia.

Tennis Australia will investigate your queries and complaints within a reasonable time and will notify you of the outcome of our investigation (usually within 30 days). Tennis Australia may refer your correspondence to the relevant ATO if necessary to ensure a timely response.

- 8.3 You subsequently have the right to file a complaint with our supervisory authority (namely, the OAIC, by following the procedure at <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>).
- 8.4 If anything in this Policy is inconsistent with any Federal, State or Territory law, the relevant Federal, State or Territory law prevails to the extent of the inconsistency.