

# LTA Tennis Foundation Privacy Notice

## About this document

This privacy notice explains how the LTA Tennis Foundation ("we", "our", "us", or the "Foundation") 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);
- 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 General Data Protection Regulation ("GDPR") 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: <https://www.justgiving.com/thetennisfoundation>, via our website's donation page, or via a more formal route for larger donations);
- 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 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;

- 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, 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;
- biographical and career information, including:
  - your name, title, gender, nationality and date of birth;
  - 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;
- 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.;
  - 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;
- 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), where you have provided this in an application for a loan or grant funding, where you subsequently provide this information, or 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 Foundation's activities, opportunities for loans and grants, and fundraising campaigns which may be of interest to you. If you do not wish the Foundation 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 Foundation'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 Foundation'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 Foundation's loan or grant application process (as applicable);
- updating our website with information about the Foundation's activities and publishing case studies and news items about our loanees and grantees and their impact in the tennis community;
- communicating with you about the Foundation's activities, opportunities for loans and grants, and fundraising campaigns which may be of interest to you, for example in email newsletters;
- sharing details in respect of any donations related Gift Aid claims with HM Revenue and Customs;
- '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;
- administration, for example in connection with a donation you have made or a fundraising event you have registered for or attended;
- identifying where personal data obtained by the Foundation 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 bases 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);
- to deal with any concerns or feedback you may have;
- 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 monitor and evaluate the performance and effectiveness of our loan and grant awards;
- for the administration of our website and our social media channels;
- to keep you informed (by email, telephone, other electronic means or, more rarely, by post) of the Foundation's activities, opportunities for loans and grants, and fundraising campaigns which may be of interest to you.

*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;
- 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);
- we have your specific or, where necessary, explicit consent to do so.

### **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 Foundation, 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 Twitter, 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 Foundation 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;
- to our partner organisations (including other charities and third party experts) where necessary for the assessment of your application 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;
- internal and external auditors;
- when the Foundation 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 Foundation and its website servers (hosted by the LTA) are based. We may, however, transfer your personal data around the world 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 consider whether any additional measures are required in order to give adequate protection for the information when it is transferred outside of the UK / EEA.

### **How long your information is kept**

For unsuccessful applicants, we may retain a record of the representative's contact details, proposed project scope, any other charity or partner organisation with whom they are affiliated, and the extent of progress through the application process. This record is retained indefinitely in the Foundation's archive for statistical / research purposes.

For successful applicants, 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 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 the Information Commissioner. You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://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 [www.lta.org.uk/about-us/contact-us](http://www.lta.org.uk/about-us/contact-us) (please indicate that your message is intended for the LTA Tennis Foundation);
- or by post: att'n: Data Protection, LTA Tennis Foundation c/o the Lawn Tennis Association, National Tennis Centre, 100 Priory Lane, London SW15 5JQ.