

Privacy Policy relating to the Club Locker Platform

1. Introduction

Welcome to the World Squash Federation's (**WSF**) privacy policy regarding the squash personal identification number (**SPIN**), the Club Locker platform and the associated personal data.

The WSF is an International Federation of approximately 150 members all of whom are National Squash Federations and around 50,000 courts worldwide. The WSF is recognised by the International Olympic Committee as the sole International Federation for squash and is a member of the General Association of International Sports Federations and of the Association of the IOC Recognised International Sports Federations. The National Squash Federations are recognised by their National Olympic Committee or Ministry of Sport as the sole recognised governing body for the sport in their country.

The Global Squash Collaborative LLC (**GSC**) administers and operates the Club Locker platform, SPIN capability on behalf of the WSF. It is based in the United States and is a collaborative of international squash federations. GSC also collects and analyses worldwide squash competition information from different nations across the globe. All information provided by you when you apply for a SPIN and open a Club Locker account will be held on the Club Locker platform.

WSF respects your privacy and is committed to protecting your personal data. This privacy policy sets out how the WSF collects and processes your personal data when you visit the WSF website and the Club Locker platform to register for a SPIN, use the associated services, interact with the WSF via email or telephone. It also tells you about your privacy rights and how the law protects you. You may be a squash player, a National Squash Federation, a Regional Squash Federation or a local squash club or a third party who has dealings with us.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

2. Important information and who we are

2.1. Purpose of this privacy policy

This privacy policy aims to give you information on how the WSF collects and processes your personal data through your use of the WSF website and the Club Locker platform, including any data you may provide when you apply for a SPIN, open a Club Locker account, use WSF services or the services available on the Club Locker platform, enter personal details about your squash performance on the Club Locker platform and in our general interactions with you.

The WSF website and the Club Locker platform are available for use by all competitive squash players, some of whom may require parental consent prior to applying for a SPIN or opening a Club Locker account. Where parental consent is required, those parents are required to read this privacy policy.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other WSF policies and is not intended to override them. We reserve the right to update this policy from time to time to reflect updates in the law.

The WSF website and the Club Locker platform include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the WSF website and the WSF zone of the Club Locker platform, we encourage you to read the privacy policy of every website you visit

2.2. Controller

WSF is the controller and responsible for your personal data (collectively referred to as "WSF", "we", "us" or "our" in this privacy policy).

We have appointed a Data Manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Manager using the details set out below.

2.3. Contact details

Our full details are:

Name: World Squash Federation

Mark correspondence for the attention of the Data Manager

Email address: admin@worldsquash.org

Postal address: 25 Russell Street, Hastings, TN34 1QU

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. Changes to the privacy policy and your duty to inform us of changes

This version was last updated on 8 June 2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

4. The data we collect about you

We collect data about you when you access the Club Locker platform, create a Club Locker account for the purposes of registering for a SPIN (or otherwise) and input personal data in to your Club Locker account.

4.1. What is personal data?

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, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, gender, date of birth and country of citizenship.
- **Contact Data** includes email address, address and telephone numbers.
- **Payment Data** includes payment card details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, photograph of yourself, account settings preferences, t-shirt size, education history, squash performance information including rankings and ratings, squash leagues and association information.
- **Usage Data** includes information about how you use our systems (such as access details and search records), the WSF websites, the Club Locker platform and associated services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) for these purposes. Nor do we collect any information about criminal convictions and offences. The WSF does collect personal data relating to health in accordance with its [*WSF Anti-Doping Programme Data Protection Policy*](#).

4.2. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

5. How is your personal data collected?

The WSF uses different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in electronic forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - register for a SPIN through the WSF website and the Club Locker platform;
 - use the Club Locker platform;
 - opt to populate the "My Profile" section of your Club Locker account with a photograph, preferences of your account settings, address, t-shirt size, details of your education in addition to your squash performance and club/league/national federation associations; or
 - permit information to be collected by third parties in relation to your team, league and/or national squash federation who then provide us with information about your performance in competitions. They may also provide profile data about you.
- **Automated technologies or interactions.** As you interact with the WSF website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing WSF cookies. Please see the [WSF cookie policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from analytics providers such as Google based outside the EU and social media platforms (such as Facebook, Twitter and LinkedIn) based both inside and outside the EU.

6. How we use your personal data

The WSF will only use your personal data when the law allows. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

By using the Club Locker platform, GSC will use the personal data you enter on the Club Locker platform to:

- operate Club Locker (which includes sharing your personal data with GSC's cloud service provider and IT contractors);
- administer cross border rankings;
- arrange and administer cross border tournaments;
- administer the use of Club Locker by member organizations, such as the WSF and other organisations with whom you may associate your account (this includes allocating license fees and allowing leagues, clubs, facilities and governing bodies associated with your accounts to access your personal data, and to supply personal data about you (particularly in relation to your performance in competitive play)); and
- manage legal claims, compliance, regulatory and investigative activities as necessary (which would include disclosing personal data in connection with a legal process or litigation to law enforcement agencies or our professional advisers where we consider this is necessary).

The Club Locker platform collects information through cookies and other similar technologies. Read the Club Locker Cookie Policy available on the Club Locker platform for further information.

GSC is a data controller when it uses your personal data for the above purposes. If you want to contact GSC, for example to exercise your data protection rights, you can do this by emailing: info@globalsquashcollaborative.com. Alternatively, you can write to the GSC at - Global Squash Collaborative, 555 Eighth Ave. Suite 1102, New York, NY 10018. For more information about GSC and its member federations see: <http://www.globalsquashcollaborative.org>

7. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
SPIN registration and opening a Club Locker account	(a) Identity (b) Contact (c) Payment (d) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (in line with the competition requirements of a professional squash player)
To provide squash related services to you including, informing you of future international squash championships and competitions together with our general interaction	(a) Identity (b) Contact (c) Marketing & Communications (d) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage our relationship with you which will include: (a) notifying you about changes to our terms or privacy policy (b) keeping your squash performance and competition details up to date (c) preparing ranking listings, circulating ranking listings to National Squash Federations and their associated squash bodies (d) analysing and forming statistical data and comparison data regarding your performance	(a) Identity (b) Contact (c) Profile (d) Marketing & Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep worldwide competitive squash records updated, to enable the creation of rankings and to evaluate the skill levels of squash players)
To administer and protect the WSF and website (including troubleshooting, data analysis, testing, system maintenance, support,	(a) Identity (b) Contact (c) Technical (d) Profile	(a) Necessary for our legitimate interests (for running the WSF, provision of administration and IT

reporting and hosting of data)		services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation
To deliver relevant website content and measure or understand the effectiveness of the services we offer	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Technical	Necessary for our legitimate interests (to study how you use our services, to develop them, to grow the reach of the WSF and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of those who will be interested in our products and services, to keep our website updated and relevant, to develop the WSF and to inform our marketing strategy)
To make suggestions and recommendations to you about opportunities that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our business)

8. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing:

8.1. Promotional offers from us

We may use your Identity, Contact, Payment, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications which may include details of competitions or offers provided by the WSF, sponsors or squash related third parties, if you have requested information from us through your Club Lock account settings and you have not opted out of receiving that marketing.

8.2. Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at any time on email at admin@worldsquash.org and by unchecking the boxes in the communication settings of the affiliation tab within your Club Locker account.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of the service we are providing to you at that time.

9. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies the WSF uses, please see the [cookie policy](#).

10. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

11. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 7 above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

12. International transfers

As the WSF is an International Federation of approximately 150 members all of whom are National Squash Federations with around 50,000 courts worldwide, it may from time to time, be required to transfer your personal data outside the European Economic Area (**EEA**). Where this is the case, we will ensure that adequate safeguarding measures in terms of the integrity and security of your personal data are in place.

Many of the third parties we deal with are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we will ensure a similar degree of protection is afforded to it by ensuring relevant safeguards are in place. Given the international nature of Squash, not all the countries have data protection laws in place equivalent to the EEA. Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

In terms of any personal data held on the Club Locker platform, GSC complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use and retention of personal information from EU member states transferred to the United States pursuant to the Privacy Shield. GSC has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov>

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, GSC is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

Please contact us if you have any queries regarding the international transfer of your data.

13. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

14. Data retention

How long will you use my personal data for?

We will retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In the case of personal data relating to competition performance this can be a number of years as such personal data is used to inform squash statistics.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact and Identity Data) for six years after they cease being customers for legal, financial and tax purposes.

In some circumstances you can ask us to delete your data: see **Request erasure** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further policy to you.

15. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. There is more information on each of these rights in the Glossary:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

15.1. No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

15.2. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). 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 you for further information in relation to your request to speed up our response.

15.3. Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a 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.

16. Glossary

16.1. Lawful basis for processing personal data:

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information

about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

16.2. External Third Parties

- Service providers acting as processors based within the EEA who provide services such as telecommunications, IT and system administration, website administration and hosting to the WSF.
- GSC partners with the WSF to provide the SPIN application process through the Club Locker platform and the ability to open a Club Locker account.
- When you pay for a SPIN, the payment and payment data is collected by Stripe, the third-party payment provider of the WSF.

16.3. Your Legal Rights

You have the right to:

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 data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.