

# **Personal Data Handling Policy for Hong Kong, China Tennis Association (HKCTA)**

**(dated October 7, 2024)**

## **1. Purpose**

This Personal Data Handling Policy sets forth the guidelines for all employees, coaches, umpires, council and committee members, independent contractors, and any other relevant personnel of the Hong Kong, China Tennis Association (HKCTA) to ensure compliance with the Personal Data (Privacy) Ordinance (PDPO) in Hong Kong and other applicable privacy laws. The policy governs the collection, use, storage, and handling of personal data obtained through employment, contracts, tournaments, tennis programs, and any other activities.

## **2. Scope**

This policy applies to all personal data collected or processed by HKCTA relating to:

- Players participating in tournaments and tennis programs.
- Employees, coaches, umpires, and independent contractors.
- Any other individuals whose personal data may be processed in the course of HKCTA operations.

## **3. Definitions**

- **Personal Data:** Information that relates to an identified or identifiable individual, such as names, contact details, identification numbers, employment history, financial information, or any other data covered under the PDPO.
- **Data Subject:** Any individual whose personal data is processed by HKCTA, including players, participants, employees, and contractors.
- **Data Controller:** HKCTA, which determines the purpose and means of the processing of personal data.
- **Data Processor:** Any party (including employees, coaches, contractors) who processes personal data on behalf of HKCTA.

## **4. Principles for Handling Personal Data**

HKCTA is committed to handling personal data in accordance with the following principles under the PDPO:

### **4.1. Lawfulness, Fairness, and Transparency**

- Personal data must be processed lawfully, fairly, and in a transparent manner.

### **4.2. Purpose Limitation**

- Personal data shall be collected only for specific, legitimate purposes related to HKCTA's operations, including employment, tournament organization, and program administration after obtaining the data subject's consent.
- The data must not be further processed in ways incompatible with the original purposes unless consent from the relevant data subject is obtained.

### **4.3. Data Minimization**

- Personal data collected must be adequate, relevant, and limited to what is necessary for the intended purpose.

### **4.4. Accuracy**

All practicable steps shall be taken to ensure that:-

- Personal data is accurate and, where necessary, kept up to date.
- Inaccurate personal data should be corrected or deleted without delay.

### **4.5. Storage Limitation**

All practicable steps shall be taken to ensure that:-

- Personal data is not kept for longer than necessary for the purpose for which it was collected.
- Data retention periods must comply with applicable laws, including statutory periods for employment and contractual records.

### **4.6. Integrity and Confidentiality**

All practicable steps shall be taken to ensure that:-

- Personal data is processed securely to protect against unauthorized or unlawful processing, accidental loss, destruction, or damage.
- Data must be stored in systems with appropriate technical and organizational measures to ensure its security.

## **5. Rights of Data Subjects**

HKCTA recognizes the rights of data subjects under the PDPO, including:

- **Right of Access:** Data subjects can request access to their personal data held by HKCTA.
- **Right of Correction:** Data subjects can request correction of inaccurate or incomplete personal data.
- **Right to Object:** Data subjects may object to certain types of data processing.
- **Right to Deletion:** Data subjects may request the deletion of their personal data, subject to legal obligations or legitimate business interests of HKCTA.

## **6. Data Collection and Processing**

- Personal data should be collected through lawful means, such as application forms, contracts, or consent agreements.
- Consent for the collection, use, and processing of personal data should be obtained where necessary, particularly for sensitive data, such as health or financial information.
- Data processors (including staffs, coaches, contractors, and umpires) must comply with HKCTA's instructions and data handling policies at all times.

## **7. Security Measures**

HKCTA will implement appropriate physical, technical, and organizational measures to safeguard personal data, including:

- **Access Control:** Restricting access to personal data to authorized personnel only.
- **Encryption:** Ensuring data is encrypted where necessary, especially during electronic transmission.
- **Confidentiality Obligations:** All staff, coaches, contractors, and affiliates handling personal data must maintain strict confidentiality.

## **8. Data Breach Reporting**

In case of a data breach, HKCTA will take immediate action to mitigate risks and notify relevant authorities and affected data subjects if required by law. Breaches should be reported to the Chief Executive Officer, Chief Operation Officer and General Counsel without delay.

## **9. Data Transfers**

Personal data may only be transferred to third parties, including external service providers or international partners, in compliance with the PDPO and applicable laws. Cross-border transfers of personal data will only be made when appropriate safeguards are in place.

## **10. Responsibilities**

All HKCTA personnel, including employees, coaches, umpires, council and committee members, and contractors, are responsible for ensuring compliance with this policy. Non-compliance may result in disciplinary action, termination of contract, or legal consequences.

## **11. Training and Awareness**

HKCTA will provide regular training and guidance on personal data handling practices to all relevant personnel to ensure full understanding and compliance with this policy and applicable laws.

## **12. Policy Review and Updates**

This policy will be reviewed regularly or whenever necessary to reflect changes in legal requirements or HKCTA operations.

## **Contact Information**

For questions or concerns about this policy or the handling of personal data, please contact HKCTA's General Counsel at [calvin.lai@tennishk.org](mailto:calvin.lai@tennishk.org).