

# StreetTT Privacy Notice

At StreetTT we are committed to respecting and protecting your online privacy. This includes your right to know what we do with the personal information you share with us. It also guides our policies regarding the management of your data, including how the information is collected, how it is processed, and for what purposes. It is important to us that we communicate our policies and procedures with you clearly and in a manner that provides clarity to you the user, as either a player or moderator. As such, this policy covers the following key areas:

1. Background Information
2. Why we need your data
3. Categories of Data
4. What data we collect
5. What data we share
6. How we contact you
7. How we protect your information
8. Retention Periods
9. Automated Decision Making
10. Your rights to manage your data

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## 1. Background Information

StreetTT is owned by Societechy Limited that collects, manages, and processes all associated data and is therefore considered the data controller. Our designated Data Protection Officer is Louis Cadier (Societechy). Questions about this privacy policy may be submitted to StreetTT by email to [admin@streettt.com](mailto:admin@streettt.com)

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## 2. Why We Need Your Data

In order to support our global network of StreetTT users and the events that these users create it is critical we understand who is participating. There are

many reasons for this, from simple things like providing participants with information around how and when they have taken part, through to more complex challenges such as measuring the impact of our events on those communities most in need of increasing their physical activity levels and social engagement. The UK General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA) require that all information we collect must be done so under a specific lawful basis. There are six clearly-defined lawful bases for processing information, and we categorise the majority of our data processing under three of those: Contract, Legitimate Interests and Consent.

## **2.1. Contract**

When you register for StreetTT we need certain information about you to enable us to provide you with the services of result submission, event creation and participation and user statistics to ensure those services are delivered to an appropriate standard, and to allow us to provide you with accurate records of your participation. This lawful basis also includes any administrative or service-related emails, for example, to confirm that you have registered with us or played a match or to alert you of an update to this Privacy Policy or other policies that are relevant to you. These therefore do not offer an option to unsubscribe as they are necessary to provide the services you requested.

If you do not provide the information required then we will not be able to provide you with records of your participation.

## **2.2. Legitimate Interests**

Outside of your direct participation we also wish to develop the reach and impact of Table Tennis and as such we have a legitimate interest to process certain information with this aim. This includes things like

- providing StreetTT users an opportunity to opt in to share their username, gender, approximate age and email address with the national governing body for Table Tennis, that is a Member Association of the International Table Tennis Federation in their country, and in order to receive direct communications from that organisation to access recognised pathways to develop in the sport,
- carrying-out research by survey to further understand who is participating in StreetTT events and who is using the StreetTT app,

- capturing and sharing images of StreetTT events taking place, helping us to inspire other people to engage in physical activity and to promote the use of table locations,
- or authoring reports for StreetTT partners from anonymised StreetTT participation data to demonstrate the use of table locations.

## **2.3. Consent**

Above and beyond simple participation, you the user, whether player or moderator, have a number of ways to help us to ensure our events positively impact the health and happiness of their local communities, and remain free to participate in. One of the best ways to support us in this way is by consenting to receive emails regarding things like merchandise, event profiles, offers, competitions and emails from our partners, training tips, and more. We therefore provide the opportunity on all emails from us, to opt out at any time. Due to GDPR requirements for providing consent, we do not process any data on children under the age of 16 if it would require consent as the lawful reason for processing. For this reason, children under the age of 16 are not permitted to create an account.

## **2.4. Other Bases**

Although extremely rare, there can be occasions where we are required to process information under one of the other three lawful bases: Legal Obligation, Vital Interest, Public Task.

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# **3. Categories of Data**

We utilise the following definitions for the types of data we collect:

## **3.1. Profile and Identity**

StreetTT ID, email address, password, participation instances (playing or moderating), username, gender, city/county/region, country

## **3.2. Contact**

Email address, phone number (optional)

### **3.3. Technical**

Device ID, Exact Location, Tracking ID, IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, records of pages visited and other information about the devices you use to access the site

### **3.4. Incident**

As part of our continual review of incidents at StreetTT user created events we maintain a record of relevant details

### **3.5. Survey**

Any data submitted to us as part of research activities

### **3.6. Event Imagery**

Filming and photography captured at StreetTT events

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## **4. What Data We Collect**

There are a number of ways where either you are able to explicitly share data with us or we are able to collect it as a result of your actions:

### **4.1. At registration**

We collect information about you that allows us to support your participation in our platform. We use this information to create a profile for you on our database, to which we can connect playing or moderating instances that in turn track your progress toward various StreetTT participation milestones. We also collect information around your activity levels and other relevant personal information that may help us support your participation more appropriately.

### **4.2. Using your profile**

You can update information such as username, city/country/region, country, messenger username. You can delete your profile.

### **4.3. Research Surveys**

From time-to-time we send out research surveys that allow us to develop an understanding of StreetTT and its participants.

### **4.4. Partner surveys**

Sent out by us, help to support our sponsors and other stakeholders in understanding their level of connection with the StreetTT communities they support.

### **4.5. Incident reports**

Compiled by our local moderators in the event of an incident. Relevant data is collected by the moderators and uploaded directly or via email to our secure online incident reporting system. In some cases staff add to this data through the process of following-up on incidents.

### **4.6. Cookies**

When you visit our websites, cookies will be stored on your computer. Generally, cookies and similar technologies work by assigning to your browser or device a unique number that has no meaning outside of StreetTT. We use these technologies to personalise your experience and to assist in delivering content specific to your interests. Additionally, after you've entered your email address and password we save that information so you don't have to re-enter it repeatedly. Most browsers automatically accept cookies. Some third-party services we use, such as Google Analytics, may place cookies in your browser. This Privacy Policy covers use of cookies by StreetTT only, and not the use of cookies by third parties. To manage the collection of information through cookies or other equivalent technology you can use the settings on your browser or mobile device.

### **4.7. Log Files**

The collection of information: Every time you connect to StreetTT website and mobile application your IP (Internet Protocol) address registers on our servers. Your IP address reveals no information other than the number assigned to you. We do not use this technology to obtain any personal data against your knowledge or free will (i.e. automatically recording email addresses of visitors).

Nor do we use it for any purpose other than to help us monitor traffic on our website, or (in case of criminal activity or misuse of our information) to cooperate with law enforcement.

#### **4.8. Web Beacons**

These are small pieces of code that deliver a graphic image on a web page or in an email for the purpose of transferring data back to us. The information collected via this process will include information such as IP Address, as well as information about how you respond to an email campaign (e.g. at what time the email was opened, which links you click on in the email, etc.).

We may use web beacons on our websites or include them in e-mails that we send to you. We use this information for a variety of purposes, including but not limited to, site traffic reporting, unique visitor counts, advertising, email auditing and reporting, and personalisation.

In some cases we allow our partners to include web beacons in emails served by us on their behalf. In these instances they are only able to collect anonymous data and have no access to personal information.

#### **4.9. Local Moderators**

In order to support StreetTT locally, moderators are volunteers. We may communicate with moderators using additional means of communications besides email: SMS, Telegram Messaging, Social Media.

#### **4.10. Social Media**

When you engage with StreetTT over social media, it will usually be as a registered user of that social media platform. The use of personal data on social media is governed by your agreement with that platform's own privacy policy or terms and conditions. StreetTT official social media pages are administered by StreetTT as a data controller of these pages. These social media platforms may process user personal data to deliver anonymised user statistics to the local administrator of that page or event. We do not use the personal data you have made available on social media outside of that platform, unless you have given us your consent to do so.

#### **4.11. Event Photography and Filming**

Photography or filming is likely to take place at StreetTT events, it is common practice, and helps us to inspire other people to engage in physical activity and to redefine what it means to be active. It also provides a means for historical recording of our events over time. Furthermore, our use of images helps to demonstrate diverse groups of people engaging in and enjoying physical activity both while engaging in StreetTT but also as part of the wider community. We ensure compliance with safeguarding laws and are supported both in-house through our Safeguarding Lead and externally with the support of other experts in the field of safeguarding. Not all photographers at StreetTT events are registered with StreetTT, participants can ask a moderator to clarify this with those taking photographs but we cannot control what people in public spaces choose to do. In line with the lawful basis of Legitimate Interest individuals have the right to object to this method of data processing by contacting us directly and requesting deletion of relevant imagery. At event-level we will also seek, where the moderator is informed in on the day, not to photograph those individuals who object or who have previously objected, and that all individuals have given consent and are over the age of 16 years old.

#### **4.12. Anonymity**

In all circumstances we allow participants to register under a pseudonym. If you have any questions on this process please contact us by email to [admin@streettt.com](mailto:admin@streettt.com)

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## **5. What Data We Share**

### **5.1. Publicly Available Information**

We do not offer privacy settings in relation to your playing or moderating participation, and as such our websites display your username, table (if you have joined one), city.county/region, country and match statistics. We do, in some cases, share (under the lawful basis of legitimate interest) this publicly-visible data with third parties.

### **5.2. Anonymised Participant Data**

Under the lawful basis of Legitimate Interest, we may share anonymised and published participant data with third parties.

### **5.3. Personal Contact Details and Personal Information**

StreetTT partners with national governing bodies for Table Tennis, that are Member Associations of the International Table Tennis Federation. Under the lawful basis of Legitimate Interest, we provide StreetTT users an opportunity to opt in to share their username, gender, approximate age and email address with the national governing body for Table Tennis of the user's stated country of residence. By opting in to share their personal contact details and personal information, the user consents to receive direct communications from the national governing body for Table Tennis of the user's stated country of residence.

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## **6. How We Contact You**

The large majority of our outgoing communication, to the StreetTT community, is via Email and Telegram Messaging. Users also receive automated notifications from within the browser and mobile application. Sending an Email or Telegram Message to you is a form of data processing, and as such may only be carried out under a specific lawful basis.

### **6.1. Under the Lawful Basis of Fulfilling a Contract**

In order to fulfil our obligation to you as a user, player or moderator, to ensure our platform is used in a safe and appropriate manner, and to ensure the StreetTT organisation is managed appropriately, there are some communications we send to everyone. The following communications fall into this category:

1. Confirmation you have registered with us.
2. Updates to key documents, such as this privacy policy.
3. Confirmation that your participation (playing or moderating) has been recorded.
4. Encouragement to improve personal statistics and news of local events.
5. Notification that you have achieved a StreetTT milestone.
6. For those who are moderators, a regular moderator update.
7. For those who have marked attendance to a specific user created event, Telegram messages from the event creator relating to that event.

### **6.2. Under the Lawful Basis of Legitimate Interest**



There are some occasions where we may contact you as part of our mission to improve access, ability and enjoyment of Table Tennis. For example, where we write to people who've registered but not participated, with the aim of understanding why and then being able to create a more supportive environment. The following types of communications fall into this category:

1. Questionnaires aimed at developing our understanding of who is participating.
2. Emails sign-posting participants to peer-support groups we feel may be suitable based on information you have provided.
3. Questionnaires for research aimed at understanding the effect of StreetTT on global health and wellbeing.
4. Directly contacting specific users.

You have a right to object to receiving these emails, to do this please contact us via email to [admin@streettt.com](mailto:admin@streettt.com)

### **6.3. Under the Lawful Basis of Consent**

Not only is our mission statement focussed on improving access, ability and enjoyment of Table Tennis, but we have also made a commitment that participation in StreetTT will be free, forever, for everyone. There are ways in which we rely on users to achieve both of those ambitions, some of which require us to be able to send certain communications. We therefore offer all users the chance to opt-in (at registration) to receive regular updates from us and our partners. Consent can be withdrawn at any time but does not apply to processing that happened before the consent was withdrawn. Individual users can also opt in to receive notifications from the events of their choice. This can be amended at any time.

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## **7. How We Protect Your Information**

We work extremely hard to apply appropriate security measures in order to protect your data from being accessed or disclosed without your permission, or lost. We have a relatively small staff team, who are regularly updated on good practice in data handling, all personal data is password protected and only available to those with a specific need for access. In the event of a data breach

we will notify you and any applicable regulator, where legally required to do so.

Moderators only have access to the username, city/county/region and country of users. Whilst we understand that moderators will also hold files that include ID barcode/QR numbers of specific usernames, this is publicly available information. Should a user request that their data be deleted from our servers, these barcode/QR numbers will no longer be able to identify specific usernames. Some moderators also use Social Media and Telegram Messaging applications to communicate with participants, in these cases we do not necessarily retain admin control centrally.

## **7.1. Third Country Data Transfers**

On occasion we may use third parties for the purposes of data processing, and these may reside outside of the European Economic Area (EEA). These third parties are selected only if they exist in a territory deemed compliant with relevant legislation or with regards to third parties based in the US they must be part of the Privacy Shield.

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## **8. Retention Periods**

In order to present our data retention periods as simply as possible we have chosen to do so using our definitions of categories of data defined in section 3 above.

### **8.1. Profile and Identity Data – In perpetuity**

This is in order to create our results tables, maintain historic records of participation, to allow participants to access their participation records, and to allow anyone who is registered with us to participate at any future StreetTT user created event without the requirement to re-register.

### **8.2. Contact Data – Ten years from most recent participation instance**

It is common for people to leave significant time periods between playing or moderating. It is also common for people to enjoy receiving our communications without participating at our events themselves.

### **8.3. Technical Data – Three years from point of data collection**

In order to provide the best possible service to our users, to support the administration of our systems and processes, and to comply with legal obligations.

### **8.4. Incident Data – In perpetuity**

We retain this data in order to keep a historical record of our incident profile, from which we are able to continually review our operating policies in order to enable the safe and appropriate delivery of our events.

### **8.5. Survey Data – In perpetuity**

This data is used for the purposes of understanding our community in greater detail. Changes over time are of particular interest where comparison of current versus historical data allows us to assess the impact of our events and associated interventions.

### **8.6. Event Imagery – In perpetuity**

Event imagery is predominantly processed under the lawful basis of Legitimate Interest, and may be stored securely by us in perpetuity as it represents a historical record of that event. Although extremely rare, there can be occasions where we are required to process information conveyed in photographs under another of the lawful bases, such as Legal Obligation, Vital Interest, Public Task.

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## **9. Automated Decision Making and Profiling**

In some situations we make automated decisions based on various types of data that we hold, this is also known as profiling. Examples of where we use this might be to send research surveys to people who have only ever participated once or to market products to specific demographics of people. Whilst our automated decision making processes do not have a legal or similarly significant effect on the individuals concerned, you do have the right to object to us applying these processes to your data.

## **10. Your Rights**

You have the right to:

### **10.1. Be informed if your personal data is being used**

Where appropriate we endeavour to inform you of this at the point where your data is being collected, however for circumstances where that is not practical or possible please refer to this Privacy Policy.

### **10.2. Get copies of your data**

You are also free, at any time, to request a downloadable copy of all the data we hold on you. This would include details of all your playing or moderating instances and as such is something we particularly recommend prior to any request for us to delete your data. To do this please contact us via email to [admin@streettt.com](mailto:admin@streettt.com)

### **10.3. Have your data corrected**

If at any time you feel the data we hold on you is incorrect, and you are unable to change it via your profile, please contact us via email to [admin@streettt.com](mailto:admin@streettt.com)

### **10.4. Have your data deleted**

Should you wish, at any time, for us to delete your data then please contact us via email to [admin@streettt.com](mailto:admin@streettt.com) and we can enable this process. Please note that this is not something that can be undone and as such we would recommend downloading your historical results (see next section) before doing so. Although we approach every request for deletion on a case-by-case basis, we do not as a rule remove data simply on request. This is in order support potential future challenges, enquiries, or investigations where this information may be critical.

### **10.5. Limit how we use your data**

If you are concerned about the accuracy of the data or how it is being used please contact us via email to [admin@streettt.com](mailto:admin@streettt.com) Where you have previously provided us with consent to use your personal data in a specific way, you can remove your consent at any time (or opt-out) by contacting us via email to [admin@streettt.com](mailto:admin@streettt.com)

### **10.6. Data portability**

Following from point 10.2 (above) we will provide copies of your data in standard machine-readable formats. In such cases, please contact us via email to [admin@streettt.com](mailto:admin@streettt.com)

### **10.7. Object to the use of your data**

Where we are processing your data under the lawful basis of Legitimate Interest you have the right to raise an objection to that processing. This is not an absolute right to object and we will carry out a balancing test where we assess the reasons for your objection in the context of our legitimate interests.

### **10.8. Raise a concern**

If, at any time, you have a concern as to how we are handling your information then please contact us via email to [admin@streettt.com](mailto:admin@streettt.com). If you feel that we have not addressed your concerns appropriately you have the right to raise them directly with the ICO.

StreetTT is owned and operated by Societechy Limited. Request contact information for the Data Protection Officer of Societechy Limited by email to [admin@streettt.com](mailto:admin@streettt.com)

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This Privacy Notice is effective as of 1st October 2022.