

Summary of Changes to the International Standard for the Protection of Privacy and Personal Information (ISPPPI)

a. Annex A, Module 3 (start point for retention of TUE certificates)

Stakeholders brought to WADA's attention that the starting point for the retention period for TUE certificates and TUE rejection decision forms under Annex A was not clear and could be wrongly interpreted as beginning on the 'approval date' of the certificate/decision. 'Certificate date' was intended to refer to the date of TUE expiry, not approval. This was an intentional change from the 2018 version of the ISPPPI to ensure evidence of the TUE is retained for as long as an athlete sample, collected during the period of validity of the TUE, can be re-analysed. Otherwise, an athlete could receive an ADRV for a substance for which they had received a valid exemption at the time the sample was collected. The following minor modifications were made to the TUE module in Annex A to resolve the ambiguity:

Module ²	Data ²	Retention-Periods ²	Remarks ²	Criteria ²
3--TUEs ²			Destroying medical information makes it impossible for WADA/ADOs to review TUEs retrospectively after TUE has lost its validity. TUE information is largely medical and therefore sensitive.	
TUE ²	TUE certificates and rejected TUE decision forms ²	10 yrs. as of certificate date of TUE expiry /date of rejection decision ²	Can be relevant in case of re-Testing or other investigations. ²	Proportionality/Necessity ²
	TUE application forms and supp. med information and any other TUE info not otherwise expressly mentioned herein. ²	12 months from end of validity date of TUE expiry ²	Loses relevance after expiration of TUE except in case of re-application. ²	Proportionality/Necessity ²
	Incomplete TUEs ²	12 months from date of creation ²	Can be relevant in case of re-application. ²	Proportionality ²

b. Annex A, Module 7 (start point for retention of ABP-related documentation)

Similarly, Athlete Passport Management Units (APMUs) advised WADA that the current retention period start date for ABP-related documentation could be interpreted as requiring documentation packages to be redacted to remove ABP results that are more than 10 years old. This interpretation would be operationally impractical and would undermine the integrity of the APMU analysis produced at the time the ABP documentation package was created. It would also not be aligned with the retention period for laboratory reports provided for in Module 5 of Annex A to the ISPPPI. The following minor modifications to the ABP module in Annex A were made to align the start point for the retention of documents generated by APMUs with that applied to documents generated by laboratories after sample analysis:

Module ²	Data ²	Retention-Periods ²	Remarks ²	Criteria ²
7--Athlete Biological Passport ²				
Results ²	Biological variables, ATPF, APF, APMU reports, expert reviews, ABP documentation packages and associated laboratory and other supporting documentation. ²	10 yrs. as of date of match between results and Doping Control Form / date of creation of relevant documents. ²	Necessary because of multiple violations and to analyze or review biological variables, APMU reports, and expert reviews, etc., over time. If ADRV, will also be kept as part of results management file (see section 6). ²	Necessity ²
Whereabouts ²	Whereabouts (only city, country and In-Competition whereabouts) ²	10 yrs. as of end of the whereabouts quarter for which the data was submitted ²	Needed to support atypical/abnormal results, or to refute Athletes' claims. ²	Proportionality/Necessity ²