

**INTERNATIONAL STANDARD FOR THE PROTECTION OF PRIVACY AND PERSONAL INFORMATION (ISPPPI)  
SUMMARY OF CHANGES  
(Following the Limited Supplementary Consultation Phase)**

The revised 2021 ISPPPI contains updates to Articles 4.1, 4.5, 5.3, 11.5 and Annex A. The updates integrate feedback from the 18 comments received during the supplementary consultation phase from six stakeholders, as well as observations from the European Data Protection Board (EDPB) provided to WADA by the Presidency of the Council of the European Union on 1 November 2019. The following summarizes the key changes to the ISPPPI<sup>1</sup>, as compared to the current, approved version of the Standard published on the WADA website in June 2020:

- **Comment to Article 4.1:** The drafting change aims to resolve any ambiguity in the comment to this Article, which is sometimes interpreted to suggest that the ISPPPI permits the application of data protection standards that are lower than what is required in the ISPPPI. This is not the intention of the comment as that would undermine the main text of Article 4.1. This comment was originally inserted in response to stakeholder requests during previous consultation exercises who wished to reiterate that they could not be in breach of the ISPPPI or the Code if there was a requirement arising under a conflicting applicable local law - e.g., a compulsory demand for producing data, for instance. In essence, this comment mirrors the same notion reflected elsewhere (e.g. 8.3(a) which permits disclosure if required by law). The change to this comment also incorporates a recommendation from the EDPB that any such conflict should be notified to WADA and relevant ADOs as soon as possible.
- **Article 4.5:** The drafting change resolves an inconsistency between Article 4.5 (where name and contact information of the person responsible for compliance with the ISPPPI was to be provided upon request) and 7 (which requires contact information to be proactively provided). The change confirms this information should be proactively provided.
- **Comment to Article 5.3(d):** The drafting change leverages the new Code-defined term “Anti-Doping Activities” to lighten the text and further clarify that while clauses 5.3(a)-(c) are illustrations of how the data minimization principle should be applied to key anti-doping activities, there are a number of other anti-doping activities under the Code and International Standards that may require the processing of personal information. The principle of data minimization applies to all Anti-Doping Activities, as expressed in Articles 5.1 and 5.2.
- **Annex A:** In response to EDBP observations that maximum retention periods should be defined, references to “indefinite” retention have been removed from Annex A. The maximum retention period for Athlete profile information has been reduced from indefinite to 10 years. For ADRV decisions and proceedings, the maximum retention period has been reduced from indefinite to the longer of 10 years or the duration of sanction, provided that ADOs have discretion to retain decisions that are important legal precedents. Finally, the retention periods applicable to biological samples have been removed from the ISPPPI. These periods are already included in the ISL, which will continue to be the case. The Module of Annex A related to Test results has instead been updated to capture analytical data resulting from sample analysis for which the maximum retention period is 10 years, provided that retention beyond the maximum 10-year period will continue to be permitted if all conditions set out in Code Article 6.3 (including anonymization of the sample and related data) have been met.
- **Article 11.5:** Separately from the EDPB observations that motivated this limited stakeholder consultation, modifications to this Article ensure any non-conformities notified to WADA under the ISPPPI are resolved in accordance with the processes set out in the International Standard for Code Compliance by Signatories.

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<sup>1</sup> Minor formatting or language edits visible on the redline were also made to both English and French versions of the revised ISPPPI.