

~~The World Anti-Doping Code~~

WORLD ANTI-DOPING CODE

INTERNATIONAL STANDARD
~~FOR~~

**PROTECTION OF
PRIVACY AND
PERSONAL
INFORMATION**

JANUARY 2015



~~June 2009~~

International Standard for the Protection of Privacy and Personal Information

The [World Anti-Doping Code International Standard for the Protection of Privacy and Personal Information \(ISPPPI\)](#) is a mandatory *International Standard* developed as part of the World Anti-Doping Program.

[The International Standard for Protection of Privacy and Personal Information](#) was first adopted ~~and approved by the World Anti-~~ 9 May 2009 and came into effect 1 June 2009. [The enclosed ISPPPI incorporates revisions to the ISPPPI and was approved at the World Conference on Doping Agency in Sport in Johannesburg by the WADA Executive Committee on 9 May 2009. The enclosed represents version 2.0 which becomes effective as of 1 June 2009.](#) 15 November 2013. It will come into effect on 1 January 2015.

[The official text of the International Standard for the Protection of Privacy and Personal Information shall be maintained by WADA and shall be published in English and French. In the event of any conflict between the English and French versions, the English version shall prevail.](#)

Published ~~on 11 May 2009~~ by:

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~~ISPPPI_June 2009~~

PREAMBLE

The World Anti-Doping International Standard for the Protection of Privacy and Personal Information is a ~~level-2~~ mandatory *International Standard* developed as part of the World Anti-Doping Program.

WADA and Anti-Doping Organizations share responsibility for ensuring that Personal Information Processed in connection with Anti-Doping Activities is protected as required by data protection and privacy laws, principles and standards. The main purpose of this *International Standard* is to ensure that organizations and ~~persons~~Persons involved in anti-doping in sport apply appropriate, sufficient and effective privacy protections to Personal Information that they Process, regardless of whether this is also required by applicable laws.

A *WADA* expert reference group reviewed, discussed and prepared this document, and specifically took into account the Organization for Economic Cooperation and Development's (OECD) 1980 Guidelines on the Protection of Privacy and Transborder Flows of Personal Data; the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (ETS. No. 108); the APEC Privacy Framework; the Charter of Fundamental Rights of the European Union, Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the ~~processing~~Processing of personal data and on the free movement of such data, and other international and regional data privacy rules and standards.

The official text of the International Standard for the Protection of Privacy and Personal Information shall be maintained by *WADA* and shall be published in English and French. In the event of any conflict between the English and French versions, the English version shall ~~be controlling. The International Standard for the Protection of Privacy and Personal Information version 2.0 shall come into effect on 1 June 2009. It shall be updated from time to time, as needed, to reflect developments in applicable laws and anti-doping practices~~prevail.

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PART ONE: INTRODUCTION, CODE PROVISIONS AND DEFINITIONS

1.0 Introduction and Scope

The purpose of the International Standard for the Protection of Privacy and Personal Information is to ensure that *Anti-Doping Organizations* apply appropriate, sufficient and effective privacy protections to the Personal Information they Process when conducting anti-doping programs, in recognition of the fact that Personal Information gathered in the anti-doping context can impinge upon and implicate the privacy rights ~~and interests~~ of ~~persons~~ Persons involved in and associated with organized sport.

The *Code*, in particular, requires *Athletes* and *Athlete Support Personnel* to furnish a significant amount of Personal Information to *Anti-Doping Organizations*. As a result, it is essential that *Anti-Doping Organizations* appropriately protect the Personal Information that they ~~collect~~ Process both to meet legal standards and to ensure the continued confidence and trust of those ~~who participate~~ involved in organized sport.

The *Code* recognizes and affirms the importance of ensuring that the privacy ~~interests of persons participating in~~ rights of Persons subject to anti-doping programs based on the *Code* are fully respected. In support of this commitment, this *International Standard* provides mandatory rules and standards relating to the protection of Personal Information by *Anti-Doping Organizations*.

Consistent with other *International Standards* that have been developed and implemented to date, this *International Standard* sets forth a minimum, common set of rules to which *Anti-Doping Organizations* must conform when collecting and handling Personal Information pursuant to the *Code*. In some cases, *Anti-Doping Organizations* may be required by applicable laws to apply rules or standards that exceed those set forth in this Standard. For purposes of this *International Standard*, definitions appearing in the *Code* shall be italicized, and additional definitions created for purposes of this *International Standard* shall be underlined.

2.0 ~~2.0~~ — Code Provisions

The following articles of the *Code* are directly relevant to this International Standard for the Protection of Privacy and Personal Information:

➤ **Code Article 14 Confidentiality and Reporting**

The ~~*Signatories agree to the*~~ principles of coordination of anti-doping results, public transparency and accountability and respect for the privacy ~~interests of individuals alleged to have violated anti-doping rules.~~ of all Athletes or other Persons are as follows:

14.1 Information Concerning Adverse Analytical Findings, Atypical Findings, and other Asserted Anti-Doping Rule Violations.

14.1.1 Notice of Anti-Doping Rule Violations to Athletes and other Persons.

The form and manner of notice of an asserted anti-doping rule violation shall be as provided in the rules of the Anti-Doping Organization with results management responsibility.

14.1.2 Notice of Anti-Doping Rule Violations to National Anti-Doping Organizations, International Federations and WADA.

The Anti-Doping Organization with results management responsibility shall also notify the Athlete's National Anti-Doping Organization, International Federation and WADA of the assertion of an anti-doping rule violation simultaneously with the notice to the Athlete or other Person.

14.1.3 Content of an Anti-Doping Rule Violation Notice.

Notification shall include: the Athlete's name, country, sport and discipline within the sport, the Athlete's competitive level, whether the test was In-Competition or Out-of-Competition, the date of Sample collection, the analytical result reported by the laboratory and other information as required by the International Standard for Testing and Investigations, or for anti-doping rule violations other than Article 2.1, the rule violated and the basis of the asserted violation.

14.1.4 Status Reports.

Except with respect to investigations which have not resulted in notice of an anti-doping rule violation pursuant to Article 14.1.1, the Anti-Doping Organizations referenced in Article 14.1.2 shall be regularly updated on the status and findings of any review or proceedings conducted pursuant to Article 7, 8 or 13 and shall be provided with a prompt written reasoned explanation or decision explaining the resolution of the matter.

➤ ~~Code Article~~ 14.1.5 Confidentiality.

The recipient organizations shall not disclose this information beyond those Persons with a need to know (which would include the appropriate personnel at the applicable National Olympic Committee, National Federation, and team in a Team Sport) until the Anti-Doping Organization with results management responsibility has made ~~public disclosure~~ Public Disclosure or has failed to make ~~public disclosure~~ Public Disclosure as required in Article ~~14.2. below:~~ 14.3.

➤ ~~Code Article 14.2 Public Disclosure~~ [Comment to Article 14.1.5: Each Anti-Doping Organization shall provide, in its own anti-doping rules, procedures for the protection of confidential information and for investigating and disciplining improper disclosure of confidential information by any employee or agent of the Anti-Doping Organization.]

14.2 Notice of Anti-Doping Rule Violation Decisions and Request for Files.

14.2.1 Anti-doping rule violation decisions rendered pursuant to Article 7.10, 8.4, 10.4, 10.5, 10.6, 10.12.3 or 13.5 shall include the full reasons for the decision, including, if applicable, a justification for why the maximum potential sanction was not imposed. Where the decision is not in English or French, the *Anti-Doping Organization* shall provide a short English or French summary of the decision and the supporting reasons.

14.2.2 An *Anti-Doping Organization* having a right to appeal a decision received pursuant to Article 14.2.1 may, within 15 days of receipt, request a copy of the full case file pertaining to the decision.

14.3 Public Disclosure.

➤ ~~Code Article 14.2.1~~

14.3.1 The identity of any *Athlete* or other *Person* who is asserted by an *Anti-Doping Organization* to have committed an anti-doping rule violation, may be *Publicly Disclosed* by the *Anti-Doping Organization* with results management responsibility only after notice has been provided to the *Athlete* or other *Person* in accordance with ~~Articles 7.2, 7.3 or Article 7.3~~, 7.4, ~~7.5, 7.6 or 7.7~~, and to the applicable *Anti-Doping Organizations* in accordance with Article 14.1.2.

➤ ~~Code Article 14.2.3~~

14.3.2 No later than twenty days after it has been determined in a final appellate decision under Article 13.2.1 or 13.2.2, or such appeal has been waived, or a hearing in accordance with Article 8 has been waived, or the assertion of an anti-doping rule violation has not otherwise been timely challenged, the *Anti-Doping Organization* responsible for results management must *Publicly Report* the disposition of the anti-doping matter including the sport, the anti-doping rule violated, the name of the *Athlete* or other *Person* committing the violation, the *Prohibited Substance or Prohibited Method* involved and the *Consequences* imposed. The same *Anti-Doping Organization* must also *Publicly Report* within twenty days the results of final appeal decisions concerning anti-doping rule violations, including the information described above.

14.3.3 In any case where it is determined, after a hearing or appeal, that the *Athlete* or other *Person* did not commit an anti-doping rule violation, the decision may be ~~disclosed publicly~~ *Publicly Disclosed* only with the consent of the *Athlete* or other *Person* who is the subject of the decision. The *Anti-Doping Organization* with results management responsibility shall use reasonable efforts to obtain such consent, and if consent is obtained, shall ~~publicly disclose~~ *Publicly Disclose* the decision in its entirety or in such redacted form as the *Athlete* or other *Person* may approve.

➤ ~~Code Article 14.2.4~~

~~For purposes of Article 14.2, publication~~ 14.3.4 Publication shall be accomplished at a minimum by placing the required information on the *Anti-Doping Organization's* ~~Web site~~ website and leaving the information up for ~~at least one (1) year~~ the longer of one month or the duration of any period of Ineligibility.

➤ ~~Code Article 14.2.5~~

14.3.5 No *Anti-Doping Organization* or WADA-accredited laboratory, or official of either, shall publicly comment on the specific facts of ~~any~~ pending case (as opposed to general description of process and science) except in response to public comments attributed to the *Athlete*, other *Person* or their representatives.

➤ ~~Code Article 14.3 — Athlete Whereabouts Information~~

14.3.6 The mandatory *Public Reporting* required in 14.3.2 shall not be required where the *Athlete* or other *Person* who has been found to have committed an anti-doping rule violation is a *Minor*. Any optional *Public Reporting* in a case involving a *Minor* shall be proportionate to the facts and circumstances of the case.

14.4 Statistical Reporting.

~~As further provided in the *International Standard for Testing*, *Athletes* who have been identified by their *International Federation* or *National Anti-Doping Organization* for inclusion in a *Registered Testing Pool* shall provide accurate, current location information. The *International Federations* and *National Anti-Doping Organizations* shall coordinate the identification of *Athletes* and the collecting of current location information and shall submit these to WADA. This information will be accessible, through ADAMS where reasonably feasible, to other *Anti-Doping Organizations* having jurisdiction to test the *Athlete* as provided in Article 15. This information shall be maintained in strict confidence at all times; shall be used exclusively for purposes of planning, coordinating or conducting *Testing*; and shall be destroyed after it is no longer relevant for these purposes. *Anti-Doping Organizations* shall, at least annually, publish publicly a general statistical report of their *Doping Control* activities, with a copy provided to WADA. *Anti-Doping Organizations* may also publish reports showing the name of each *Athlete* tested and the date of each *Testing*. WADA shall, at least annually, publish statistical reports summarizing the information that it receives from *Anti-Doping Organizations* and laboratories.~~

➤ ~~Code Article~~ 14.5 *Doping Control* Information Clearinghouse.

WADA shall act as a central clearinghouse for *Doping Control Testing* data and results, including, in particular, *Athlete Biological Passport* data for *International-Level Athletes* and ~~national-level Athletes who have been included in their *National Anti-Doping Organization's*~~ *National-Level Athletes*

and whereabouts information for Athletes including those in Registered Testing ~~Pool~~Pools. To facilitate coordinated test distribution planning and to avoid unnecessary duplication in Testing by ~~the~~ various *Anti-Doping Organizations*, each *Anti-Doping Organization* shall report all *In-Competition* and *Out-of-Competition* tests on such *Athletes* to the WADA clearinghouse, using ADAMS or another system approved by WADA, as soon as possible after such tests have been conducted. This information will be made accessible, where appropriate and in accordance with the applicable rules, to the *Athlete*, the *Athlete's* ~~National Federation, National Olympic Committee or National Paralympic Committee, National Anti-Doping Organization,~~ and International Federation, and ~~the International Olympic Committee or International Paralympic Committee.~~ any other Anti-Doping Organizations with Testing authority over the Athlete.

To enable it to serve as a clearinghouse for *Doping Control Testing* data and results management decisions, WADA has developed a database management tool, ADAMS, that reflects ~~emerging~~ data privacy principles. In particular, WADA has developed ADAMS to be consistent with data privacy statutes and norms applicable to WADA and other organizations using ADAMS. Private information regarding an *Athlete*, *Athlete Support Personnel*, or others involved in anti-doping activities shall be maintained by WADA, which is supervised by Canadian privacy authorities, in strict confidence and in accordance with the International Standard for the ~~protection of privacy. WADA shall, at least annually, publish statistical reports summarizing the information that it receives, ensuring at all times that the privacy of Athletes is fully respected and make itself available for discussions with national and regional data privacy authorities~~ Protection of Privacy and Personal Information.

➤ ~~Code Article~~ 14.6 Data Privacy 5

~~When performing obligations under the Code, Anti-Doping Organizations may collect, store, process or disclose personal information relating to Athletes and third parties. Each Anti-Doping Organization shall ensure that it complies with applicable data protection and privacy laws with respect to their handling of such information, as well as the International Standard for the protection of privacy that WADA shall adopt to ensure Athletes and non-athletes are fully informed of and, where necessary, agree to the handling of their personal information in connection with~~ other Persons where necessary and appropriate to conduct their anti-doping activities ~~arising~~ under the Code and International Standards (including specifically the International Standard for the Protection of Privacy and Personal Information), and in compliance with applicable law.

[Comment to Article 14.6: Note that Article 22.2 provides that "Each government will put in place legislation, regulation, policies or administrative practices for cooperation and sharing of information with Anti-Doping Organizations and sharing of data among Anti-Doping Organizations as provided in the Code."]

3.0 Terms and Definitions

3.1 Selected Defined Terms from the Code

Anti-Doping Organization: A *Signatory* that is responsible for adopting rules for initiating, implementing or enforcing any part of the *Doping Control* process. This includes, for example, the International Olympic Committee, the International Paralympic Committee, other *Major Event Organizations* that conduct *Testing* at their *Events*, WADA, International Federations, and *National Anti-Doping Organizations*.

Athlete: Any *Person* who ~~participates~~competes in sport at the international level (as defined by each International Federation), ~~or~~ the national level (as defined by each *National Anti-Doping Organization*, ~~including but not limited to those Persons in its Registered Testing Pool~~), and any other competitor in sport who is otherwise subject to the jurisdiction of any *Signatory* or other sports organization accepting the Code. ~~All provisions of the Code, including, for example, Testing, and therapeutic use exemptions must be applied to international and national level competitors. Some National Anti-Doping Organizations may elect to test and apply anti-doping rules to recreational level or masters competitors who are not current or potential national caliber competitors. National Anti-Doping Organizations are not required, however, to apply all aspects of the Code to such Persons. Specific national rules may be established for Doping Control for non-international level. An Anti-Doping Organization has discretion to apply anti-doping rules to an Athlete who is neither an International-Level Athlete nor a National-Level Athlete, and thus to bring them within the definition of "Athlete." In relation to Athletes who are neither International-Level nor National-Level Athletes, an Anti-Doping Organization may elect to: conduct limited Testing or no Testing at all; analyze Samples for less than the full menu of Prohibited Substances; require limited or no whereabouts information; or not require advance TUEs. However, if an Article 2.1, 2.3 or 2.5 anti-doping rule violation is committed by any Athlete over whom an Anti-Doping Organization has authority who competes below the international or non-national level competitors without being in conflict with national level, then the Consequences set forth in the Code (except Article 14.3.2) must be applied. Thus, a country could elect to test recreational level competitors but not require therapeutic use exemptions or whereabouts information. In the same manner, a Major Event Organization holding an Event only for masters level competitors could elect to test the competitors but not require advance therapeutic use exemptions or whereabouts information.~~ For purposes of Article 2.8 ~~(Administration or Attempted Administration)~~ and Article 2.9 and for purposes of anti-doping information and education, any *Person* who participates in sport under the authority of any *Signatory*, government, or other sports organization accepting the Code is an *Athlete*.

[Comment: This definition makes it clear that all International- and National-Level Athletes are subject to the anti-doping rules of the Code, with the precise definitions of international- and national-level sport to be set forth in the anti-doping rules of the International Federations and National Anti-Doping Organizations, respectively. The definition also allows each National Anti-Doping Organization, if it chooses to do so, to expand its anti-doping program beyond

International- or National-Level Athletes to competitors at lower levels of Competition or to individuals who engage in fitness activities but do not compete at all. Thus, a National Anti-Doping Organization could, for example, elect to test recreational-level competitors but not require advance TUEs. But an anti-doping rule violation involving an Adverse Analytical Finding or Tampering results in all of the Consequences provided for in the Code (with the exception of Article 14.3.2). The decision on whether Consequences apply to recreational-level Athletes who engage in fitness activities but never compete is left to the National Anti-Doping Organization. In the same manner, a Major Event Organization holding an Event only for masters-level competitors could elect to test the competitors but not analyze Samples for the full menu of Prohibited Substances. Competitors at all levels of Competition should receive the benefit of anti-doping information and education.]

Athlete Support Personnel: Any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other Person working with, treating or assisting an Athlete participating in or preparing for sports Competition.

Participant: Any Athlete or Athlete Support ~~Personnel~~Person.

3.2 Defined Terms from the International Standard on Privacy and Personal Information

Anti-Doping Activities: Activities specified by the Code and the International Standards to be carried out by Anti-Doping Organizations, and their Third-Party Agents, for the purpose of establishing whether anti-doping rule violations took place, including collecting whereabouts information; conducting Testing; performing results management; determining whether an Athlete's ~~use of a prohibited substance or method~~Use of a Prohibited Substance or Prohibited Method is strictly limited to legitimate and documented therapeutic purposes; educating Participants on their rights and responsibilities; conducting investigations into anti-doping rule violations; and initiating legal proceedings against those who are alleged to have committed such a violation.

Personal Information: Information, including without limitation Sensitive Personal Information, relating to an identified or identifiable Participant or relating to other ~~persons~~Persons whose information is Processed solely in the context of an Anti-Doping Organization's Anti-Doping Activities.

[3.2 Comment: It is understood that Personal Information includes, but is not limited to, information relating to an Athlete's name, date of birth, contact details and sporting affiliations, ~~Whereabouts~~whereabouts, designated therapeutic use exemptions (if any), anti-doping test results, and results management (including disciplinary hearings, appeals and sanctions). Personal Information also includes personal details and contact information relating to other ~~persons~~Persons, such as medical professionals and other ~~persons~~Persons working with, treating or assisting an Athlete in the context of Anti-Doping Activities. Such information remains Personal Information and is regulated by this Standard for the entire duration of its

Processing, irrespective of whether the relevant individual remains involved in organized sport.]

Processing (and its cognates, Process and Processed): Collecting, retaining, storing, disclosing, transferring, transmitting, amending, deleting or otherwise making use of Personal Information.

Security Breach: Any unauthorized and/or unlawful Processing of, including access to, Personal Information whether in electronic or hard-copy or other form, or interference with an information system, that compromises the privacy, security, confidentiality or integrity of Personal Information.

Sensitive Personal Information: Personal Information relating to a *Participant's* racial or ethnic origin, commission of offences (criminal or otherwise), health (including information derived from analyzing an *Athlete's Samples* or *Specimens*) and genetic information.

Third Party: Any natural ~~person~~Person or legal entity other than the natural ~~person~~Person to whom the relevant Personal Information relates, *Anti-Doping Organizations* and Third-Party Agents.

Third-Party Agent: ~~The~~Any natural or legal ~~person~~Person, public authority, agency or body, including without limitation subcontractors and their subcontractors, that Processes Personal Information for or on behalf of an *Anti-Doping Organization*.

PART TWO: STANDARDS FOR HANDLING PERSONAL INFORMATION

4.0 Processing Personal Information in Accordance with International Standard and Applicable Law

4.1 This *International Standard* sets forth a minimum set of requirements ~~for~~applicable to the Processing of Personal Information by *Anti-Doping Organizations* and their Third-Party Agents in the context of their Anti-Doping Activities. All *Anti-Doping Organizations* must comply with this Standard, even when its requirements exceed those arising under the *Anti-Doping Organization's* applicable data protection and/or privacy laws, reflecting the vital need to protect the privacy of *Participants* and other ~~persons~~Persons involved in and associated with anti-doping in sport.

[4.1 Comment: Anti-Doping Organizations, along with any Third-Party Agents that Process Personal Information for or on behalf of Anti-Doping Organizations, minimally must comply with the requirements set forth in this International Standard, provided that such compliance does not breach other applicable laws. In cases where compliance with the requirements of this International Standard may cause an Anti-Doping Organization to breach other applicable laws, those laws shall prevail, which. This result will not lead to a determination of non-compliance with the World Anti-Doping Code.]

4.2 *Anti-Doping Organizations* may be subject to data protection and privacy laws and regulations that impose requirements that exceed those arising under

this *International Standard*. In such circumstances, *Anti-Doping Organizations* must ensure that their Processing of Personal Information complies with all such data protection and privacy laws and regulations.

[4.2 Comment: *Anti-Doping Organizations* in certain countries may be subject to laws and regulations that govern their Processing of Personal Information relating to natural ~~persons~~Persons in addition to *Participants*, such as their own employees or staff employed by other *Anti-Doping Organizations*, or impose additional restrictions going beyond this *International Standard*. In all such cases, *Anti-Doping Organizations* ~~will be~~are expected to comply with applicable data protection laws and regulations.]

5.0 ~~5.0~~ — Processing Relevant and Proportionate Personal Information

5.1 *Anti-Doping Organizations* shall only Process Personal Information where ~~necessary and appropriate~~relevant, in order to conduct ~~their~~ Anti-Doping Activities under the *Code* (~~such as those identified in Articles 2, 4.4, 5-8, 10-16 and 18-20~~) and *International Standards*, or where otherwise required by applicable law, regulation or compulsory legal process, provided such Processing does not conflict with applicable privacy and data protection laws.

5.2 *Anti-Doping Organizations* shall not Process Personal Information that is irrelevant or unnecessary in the context of their Anti-Doping Activities as identified in Article 5.1.

[5.2 Comment: *Anti-Doping Organizations* shall examine the different contexts in which they Process Personal Information to ensure that the Processing of the Personal Information in any given case is required in order to satisfy one of the purposes identified in Article 5.1. Where *Anti-Doping Organizations* cannot satisfy themselves that the Processing is necessary, they shall refrain from Processing the Personal Information.]

5.3 In particular, except as otherwise required by the *Code* or expressly required by law:

a. *Anti-Doping Organizations* Processing Personal Information (which ~~will~~may involve Processing Sensitive Personal Information ~~related~~relating to *Athletes* and Processing non-Sensitive Personal Information ~~related~~relating to *Participants* and potentially other ~~persons~~Persons) in order to determine whether an *Athlete's Use* ~~or Possession of a prohibited substance or method~~of a Prohibited Substance or Prohibited Method is strictly limited to legitimate and documented therapeutic purposes, shall Process only the Personal Information ~~needed~~appropriate and relevant for making this determination as required by the *International Standard for Therapeutic Use Exemptions*.

b. *Anti-Doping Organizations* Processing Personal Information ~~related~~relating to *Participants* and other ~~persons~~Persons in order to perform *Testing*, shall Process only the Personal Information (including whereabouts information) ~~needed to conduct~~ and Therapeutic Use Exemptions appropriate and relevant for conducting *Testing* (e.g., test distribution

planning, *Sample* collection, *Sample* handling, ~~and~~ *Sample* transport to the laboratory or associated matters) in accordance with the Code ~~(such as Articles 2, 5 and 15)~~ and/or the International Standard for Testing and Investigations.

c. *Anti-Doping Organizations* Processing Personal Information ~~related~~ relating to *Participants* and other ~~persons~~ Persons in order to engage in investigation and results management; (including associated disciplinary hearings, appeals and adjudications) shall Process only the Personal Information ~~needed, including but not limited to whereabouts information, Therapeutic Use Exemptions, and test results, appropriate and relevant~~ for investigating and establishing one or more anti-doping rule violations.

d. *Anti-Doping Organizations* may Process Personal Information relating to *Participants* and other *Persons* for other specified purposes, provided that those purposes relate exclusively to the fight against doping and are found to be relevant to that fight following an appropriately documented assessment performed by the *Anti-Doping Organization*.

[5.3.d. Comment: In certain contexts, it may be appropriate or necessary for *Anti-Doping Organizations* to Process Personal Information for additional purposes, besides those identified in Articles 5.3.a.-c., in order to engage effectively in the fight against doping. Such purposes may include, for example, the development and improvement of test planning and Testing procedures and processes. Such Processing must be exclusively linked to the fight against doping and may only occur where the *Anti-Doping Organization* has documented the need to perform such Processing.]

5.4 Personal Information Processed by *Anti-Doping Organizations* shall be processed fairly and shall be accurate, complete and kept up-to-date. *Anti-Doping Organizations* shall ~~where possible, and taking into account the responsibilities of *Participants* such as under Article 14.3 of the Code and Article 11 of the International Standard for Testing~~; correct or amend as soon as possible any Personal Information that they ~~affirmatively~~ know to be incorrect or inaccurate ~~as soon as possible~~; taking into account the responsibilities of *Participants* such as under Article 14.3 of the Code and Article 11 of the International Standard for Testing and Investigations.

[5.4 Comment: Where *Participants* are responsible for providing Personal Information about themselves directly to *Anti-Doping Organizations* and for keeping it accurate, complete and up-to-date, they should be informed of this obligation and, whenever practicable, offered reasonable means to fulfill it. For instance, this could involve furnishing ~~Individuals~~ individuals with access to their Personal Information via the Internet through online tools and resources.]

6.0 ~~6.0~~ — Processing Personal Information in Accordance with Law or with Consent

6.1 *Anti-Doping Organizations* shall only Process Personal Information:

- on valid legal grounds, which can include compliance with legal obligations, fulfillment of a contract or to protect the vital interests of the Participant and other ~~persons~~Persons; or
- where permitted, with a Participant's or other ~~person~~Person's informed consent, subject to the exceptions in Article ~~6.3.b~~6.2.b, 6.3 and 6.4 of this *International Standard*.

[6.1 Comment: This International Standard envisions that Personal Information will be Processed in cases where the law expressly provides for its Processing or with the consent of Participants, subject to appropriate exceptions to avoid Participants or other ~~persons~~persons undermining the Code. Principal responsibility for obtaining the consent of an Athlete, and/or his or her associated Athlete Support Personnel, shall rest with the Anti-Doping Organization(s) that places the relevant Athlete in its Registered Testing Pool.]

~~6.2~~ Where, ~~in accordance with Article 6.1, it is possible for Anti-Doping Organizations to Process Sensitive Personal Information with consent, the express and written consent of the Participant or person to whom the Personal Information relates shall be obtained. The Processing of Sensitive Personal Information shall occur in accordance with any specific safeguards or procedures established under locally applicable data protection laws and regulations.~~

~~*[6.2 Comment: This International Standard imposes additional restrictions where Anti-Doping Organizations Process Sensitive Personal Information, reflecting the greater sensitivities surrounding the Processing of such information. Although the Standard defines Sensitive Personal Information to expressly include different classes of information, this is not to suggest that such information should be Processed by Anti-Doping Organizations, as required by Article 5.1.]*~~

~~6.3~~ Where, ~~in accordance with Article 6.1, it is possible for~~ Anti-Doping Organizations ~~to~~ Process Personal Information with consent, Anti-Doping Organizations shall, in order to obtain an informed consent, ~~as required by Article 6.2,~~ ensure that adequate information is furnished to the Participant or ~~person~~Person to whom the Personal Information relates as described more fully in Article 7.

a. Anti-Doping Organizations shall inform Participants of the negative ~~consequences~~Consequences that could arise from their refusal to participate in ~~doping controls~~Doping Controls, including *Testing*, and of the refusal to consent to the Processing of Personal Information as required for this purpose.

~~[6.3.6.2.a.~~ *Comment: For the avoidance of doubt, Participants shall be informed that their refusal to participate in ~~doping controls~~Doping Controls, when requested to do so, could prevent their continued involvement in organized sport and, for Athletes, constitute a violation of the Code and invalidate ~~competition~~Competition results, among other things. A Participant who believes that an Anti-Doping Organization does not comply with this International Standard may notify WADA pursuant to Article 11.5, which shall, without prejudice to any other rights the*

Participant may have under applicable law, consider the grounds for the complaint.]

b. *Anti-Doping Organizations* shall inform *Participants* that regardless of any refusal to grant or subsequent withdrawal of consent, the Processing of their Personal Information by *Anti-Doping Organizations* still may be required, unless otherwise prohibited by applicable law, where necessary to enable *Anti-Doping Organizations*:

- to commence or pursue investigations involving suspected anti-doping rule violations relating to the *Participant*;
- to conduct or participate in proceedings involving suspected anti-doping rule violations relating to the *Participant*; or
- to establish, exercise or defend against legal claims relating to the *Anti-Doping Organization*, the *Participant* or both.

[6.3.6.2.b. Comment: In certain limited circumstances, Anti-Doping Organizations must have the ability to Process Personal Information in the absence of the Participant's consent. These exceptions are necessary to avoid situations where Participants refuse to grant consent or withdraw consent in order to circumvent anti-doping efforts and procedures and evade detection for a doping violation.]

6.3 Where Anti-Doping Organizations Process Sensitive Personal Information with consent, the express and written consent of the Participant or Person to whom the Personal Information relates shall be obtained. The Processing of Sensitive Personal Information shall occur in accordance with any specific safeguards or procedures established under applicable data protection laws and regulations.

[6.3 Comment: This International Standard imposes additional restrictions where Anti-Doping Organizations Process Sensitive Personal Information, reflecting the greater sensitivities surrounding the Processing of such information. Although the Standard defines Sensitive Personal Information to expressly include different classes of information, this is not to suggest that such information should be Processed by Anti-Doping Organizations, as required by Article 5.1.]

6.4 In cases where a *Participant* is incapable of furnishing ~~their~~an informed consent by virtue of ~~their~~ age, mental capacity or other legitimate reason recognized in law, the *Participant's* legal representative, guardian or other competent representative may furnish consent on the *Participant's* behalf for purposes of this *International Standard*, as well as exercise the *Participant's* rights arising under Article 11 below. *Anti-Doping Organizations* shall ensure that obtaining consents under such circumstances is permitted by applicable law.

7.0 Ensuring Appropriate Information is Furnished to Participants and Other Persons

7.1 An *Anti-Doping Organization* shall inform *Participants* or ~~person~~Persons to whom the Personal Information relates about the Processing of their Personal Information. This information shall include:

- the identity of the *Anti-Doping Organization* collecting the Personal Information;
- types of Personal Information that may be Processed;
- the purposes for which the Personal Information may be used and how long it may be retained;
- other potential recipients of the Personal Information, including *Anti-Doping Organizations* located in other countries where the *Participant* may compete, train or travel;
- the possibility and circumstances under which Personal Information may, where permitted by applicable law, be ~~publicly disclosed~~Publicly Disclosed (such as the disclosure of test results and tribunal decisions);
- the *Participant's* rights with respect to the Personal Information under this *International Standard* and the means to exercise those rights, including the procedure for submitting complaints pursuant to Article 11.5; and
- any other information necessary to ensure that the ~~handling~~Processing of the Personal Information remains fair, such as information about regulatory authorities or bodies that oversee the *Anti-Doping Organization's* Processing of Personal Information.

7.2. *Anti-Doping Organizations* shall communicate the above information to *Participants* or other ~~persons~~Persons prior to or at the time that they collect Personal Information from *Participants* or other ~~persons~~Persons, and *Anti-Doping Organizations* shall be responsive to the questions or concerns of *Participants* relating to the Processing of their Personal Information by the *Anti-Doping Organization*. Where *Anti-Doping Organizations* receive Personal Information from Third Parties, and not directly from the *Participant*, they shall communicate the above information as soon as possible and without ~~unnecessary~~undue delay, unless it has previously ~~has~~ been furnished to the *Participant* or other ~~person by other parties~~Person by other parties. Exceptionally, notice to the *Participant* or other *Persons* may be delayed or suspended where providing such notice might reasonably be considered to jeopardize an anti-doping investigation or otherwise undermine the integrity of the anti-doping process. In such cases, the justification for the delay must be appropriately documented and the information provided to the *Participant* or other *Persons* as soon as reasonably possible.

[7.2 Comment: *Anti-Doping Organizations* should recognize that basic principles of fairness require that where a *Participant's* Personal Information is Processed in the context of Anti-Doping Activities, he or she should receive or have ~~reasonable~~ access to information that explains in simple terms the purpose and procedures for the collection and processing of their Personal Information ~~in simple terms~~. This *International Standard* aspires to ensure that *Participants* acquire a basic grasp of the roles and responsibilities performed by the different organizations involved in anti-doping in sport, as those relate to the Processing of Personal Information. Under no circumstances should *Anti-Doping Organizations* seek to mislead or misinform *Participants* in order to collect or use their Personal Information.

Each Anti-Doping Organization should ensure that its Processing of Personal Information is reasonably transparent to Participants, notwithstanding the fact that certain information relating to Anti-Doping Activities, notably information concerning scheduled Testing and investigations and proceedings relating to anti-doping rule violations, may need to be temporarily withheld from Participants in order to maintain the integrity of the anti-doping process. Similarly, notice to Participants also may need to be temporarily withheld if providing the information might reasonably risk jeopardizing an ongoing or imminent investigation into doping-related activities conducted by an Anti-Doping Organization or law enforcement agencies. The prompt provision of appropriate information to Participants pursuant to this Article 7 is essential given the serious, adverse consequences that might arise if Participants are found to have committed an anti-doping rule violation.]

7.3 Anti-Doping Organizations shall provide the above information, together with the contact details of the accountable Person appointed pursuant to Section 9.1, in a manner and format, whether written, oral or otherwise, that Participants or ~~person~~Persons to whom the Personal Information relates can easily comprehend, taking into account local practices, customs and the particular circumstances surrounding the Processing of the Personal Information.

[7.3 Comment: Anti-Doping Organizations need to determine the most effective means of providing information in particular cases, recognizing that furnishing Participants with written notice is to be preferred ~~whenever practicable.~~ when practical. This also may include furnishing notices through generally available sources, such as brochures and Internet websites, alone or preferably in combination with more succinct notices on forms and other documentation provided directly to Participants.]

8.0 Disclosures of Personal Information to other Anti-Doping Organizations and Third Parties

8.1 Anti-Doping Organizations shall not disclose Personal Information to other Anti-Doping Organizations except where such disclosures are necessary to allow the Anti-Doping Organizations receiving the Personal Information to fulfill obligations under the Code and in accordance with applicable privacy and data protection laws.

[8.1 Comment: In many instances required by the Code, it is necessary for Anti-Doping Organizations to share certain Personal Information relating to Participants with other Anti-Doping Organizations so that they may engage in Code-mandated Testing. For instance, this may occur in order to subject Athletes to In-Competition and Out-of-Competition Testing. In such cases, Anti-Doping Organizations shall cooperate with one another to ensure that the participation by Participants in such Testing remains suitably transparent to Participants and complies with the rules set out in this International Standard and applicable laws.]

8.2 Anti-Doping Organizations shall not disclose Personal Information to other Anti-Doping Organizations: (i) where the recipient Anti-Doping Organizations cannot establish a right, authority or need to obtain the Personal Information; (ii) where there is evidence that the recipient Anti-Doping Organizations do not or cannot comply with this *International Standard*; (iii) where the Anti-Doping

Organization is prohibited from disclosing the Personal Information by applicable law or restrictions imposed by a competent supervisory authority; or (iv) where the disclosure would seriously compromise the status of an ongoing investigation into anti-doping rule violations. Where an *Anti-Doping Organization* has concerns that another *Anti-Doping Organization* is incapable of complying with this *International Standard*, it shall make its concerns known to the *Anti-Doping Organization* and WADA as soon as possible.

8.3 Apart from the disclosures referenced in Sections 8.1 and 8.2 above, Anti-Doping Organizations may disclose Personal Information to Third Parties, besides Anti-Doping Organizations, where such disclosures:

- a. are required by law, regulation or compulsory legal process;
- b. take place with the informed, express and written consent of the relevant *Participant*; or
- c. are necessary to assist law enforcement or governmental or other authorities in the detection, investigation or prosecution of a criminal offence or breach of the *Code*, provided that the Personal Information requested is directly reasonably relevant to the offence in question and cannot otherwise ~~cannot~~ reasonably be obtained by the authorities.

[8.3.c. Comment: The ability of an Anti-Doping Organization to cooperate and exchange Personal Information with law enforcement agencies and the manner by which this is to occur may depend upon applicable national laws and regulations. Such rules may sometimes require or encourage Anti-Doping Organizations to disclose Personal Information to law enforcement when they are aware that this information may be relevant to an investigation. Anti-Doping Organizations must comply with such national obligations where they exist.]

9.0 Maintaining the Security of Personal Information

9.1 *Anti-Doping Organizations* shall designate a ~~person~~Person who is accountable for compliance with this *International Standard* and all locally applicable privacy and data protection laws. They shall take reasonable measures to ensure that the name and contact information of the ~~person~~Person so designated is made readily available to *Participants* should they request it.

9.2 *Anti-Doping Organizations* shall protect Personal Information that they Process by applying all necessary security safeguards, including physical, organizational, technical, environmental and other measures, to prevent the loss, theft, or unauthorized access, destruction, use, modification or disclosure (including disclosures made via electronic networks) of Personal Information.

[9.2 Comment: Anti-Doping Organizations shall ensure that any access to Personal Information by their own personnel shall take place on a need-to-know basis only and where consistent with assigned roles and responsibilities. Personnel accessing Personal Information should be informed of the need to hold Personal Information in confidence.]

9.3 *Anti-Doping Organizations* shall apply security measures that take into account the sensitivity of the Personal Information being Processed. *Anti-Doping Organizations* shall apply a higher level of security to the Sensitive Personal Information that they Process, reflecting the correspondingly greater risk that the unlawful or unauthorized disclosure of such information presents to the *Participant* or personPerson to whom the Personal Information relates.

9.4 *Anti-Doping Organizations* disclosing Personal Information to Third-Party Agents in connection with their Anti-Doping Activities shall ensure that such Third-Party Agents are subject to appropriate controls, including contractual controls, in order to protect the confidentiality and privacy of the Personal Information and to ensure that the Personal Information is only Processed for and on behalf of the *Anti-Doping Organization*.

[9.4 Comment: Anti-Doping Organizations have an ongoing responsibility to protect any Personal Information under their effective control or in their possession, including Personal Information Processed by their Third-Party Agents, such as IT-service providers, laboratories and external Doping Control Officers.]

9.5 *Anti-Doping Organizations* are required to choose Third-Party Agents that provide sufficient guarantees, in accordance with applicable law and this Standard, in respect of the technical security measures and organizational measures governing the Processing to be carried out.

9.6 In the event of a Security Breach, the responsible Anti-Doping Organization shall inform affected Participants or other Persons of the breach, where this breach is likely to affect in a significant way the rights and interests of those persons concerned. The information must be provided as soon as reasonably possible once the Anti-Doping Organization becomes aware of the details of the Security Breach and should describe the nature of the breach, the possible negative Consequences for those Persons concerned and the remediation measures taken or to be taken by the Anti-Doping Organization. Additionally, the Anti-Doping Organization shall ensure that the Person appointed pursuant to Section 9.1 is also informed about the Security Breach.

[9.6 Comment: Security Breach notification obligations are becoming increasingly common throughout the world. Pursuant to Article 4 of this Standard, Anti-Doping Organizations must comply with national obligations that go beyond the Standard (i.e., some national regimes may require additional notification to a competent authority or impose specific timeframes for notification). A breach does not significantly affect an individual when the Personal Information in question is subject to suitable technological protection measures (e.g., encryption) and there is no indication that the protection has been compromised. Notice shall be given by any appropriate means, whether written, verbally or otherwise, taking into account the particular circumstances of the Security Breach, including the prejudice that the relevant Persons may suffer as a result of the Security Breach.]

10.0 Retaining Personal Information ~~Only as Necessary~~ Where Relevant and Ensuring Its Destruction

10.1 As a general rule, retaining Sensitive Personal Information requires stronger or more compelling reasons and justifications than retaining non-Sensitive Personal Information.

10.2 *Anti-Doping Organizations* shall ensure that Personal Information is only retained ~~for as long as necessary to fulfill~~ where it remains relevant to fulfilling their obligations under the *Code* or under this Standard or where otherwise required by applicable law, regulation or compulsory legal process. Once Personal Information no longer serves the above purposes, it shall be deleted, destroyed or permanently anonymized.

10.3 In order to ensure the effective application of Article 10.1, *Anti-Doping Organizations* shall establish clear retention times to govern their Processing of Personal Information consistent with the above-described limitations. *Anti-Doping Organizations* shall develop specific plans and procedures to ensure the secure retention and eventual destruction of Personal Information.

10.4 Different retention times ~~shall apply~~ may be applied to different types of Personal Information and shall take into account the purposes for which the Personal Information is Processed in the context of Anti-Doping Activities, including the granting of Therapeutic Use Exemptions, *Testing*, the investigation of doping violations, and the sanctioning of such violations. *Anti-Doping Organizations* shall adhere to those retention times set forth in Annex A (Retention Times), as amended from time to time.

[10.4 Comment: WADA shall undertake to develop guidelines setting forth more specific retention times for the different types of Personal Information Processed in the anti-doping context.]

11.0 Rights of *Participants* and Other *Persons* with Respect to Personal Information

11.1 *Participants* or ~~person~~ Persons to whom the Personal Information relates shall have the right to obtain from *Anti-Doping Organizations*: (a) confirmation of whether or not *Anti-Doping Organizations* Process Personal Information relating to them, (b) the information as per Article 7.1, and (c) a copy of the relevant Personal Information within a reasonable timeframe, in a readily intelligible format, and without excessive cost, unless to do so in a particular case plainly conflicts with the *Anti-Doping Organization's* ability to plan or conduct *No Advance Notice Testing* or to investigate and establish anti-doping rule violations.

[11.1 Comment: Save in exceptional circumstances, (which may include situations where the amount of Personal Information at issue is significant and involves a disproportionate effort to assemble), an Anti-Doping Organization ordinarily is expected to respond no later than 6 to 8 weeks from the date the request is received.]

11.2 *Anti-Doping Organizations* have to respond to requests from *Participants* or ~~person~~ Persons to whom the Personal Information relates seeking access to their

Personal Information, except if doing so imposes a disproportionate burden on the *Anti-Doping Organizations* in terms of cost or effort given the nature of the Personal Information in question.

11.3 In the event an *Anti-Doping Organization* refuses to allow a *Participant* access to his or her Personal Information, it shall inform the *Participant* and ~~explain~~set out in writing the ~~grounds~~reasons for refusing the request as soon as practicable. *Anti-Doping Organizations* shall ensure that *Participants* only obtain Personal Information relating to themselves, and not relating to other *Participants* or third ~~persons~~Persons, where they seek to obtain access to Personal Information pursuant to this Article 11.

11.4 Where an *Anti-Doping Organization's Processing* of Personal Information is shown to be inaccurate, incomplete, or excessive, it shall, as appropriate, rectify, amend or delete the relevant Personal Information as soon as possible. If the *Anti-Doping Organization* has disclosed the Personal Information in question to another *Anti-Doping Organization* that to its knowledge or belief continues to Process the Personal Information, it shall inform that *Anti-Doping Organization* of the change as soon as possible, unless this proves impossible or involves a disproportionate effort.

11.5 Without prejudice to any other rights a *Participant* may have under applicable laws, a *Participant* shall be entitled to initiate a complaint with an *Anti-Doping Organization* where he or she has a reasonable, good-faith belief that an *Anti-Doping Organization* is not complying with this *International Standard* and each *Anti-Doping Organization* shall have a procedure in place for dealing with such complaints in a fair and impartial manner. In the event that the complaint cannot be satisfactorily resolved, the *Participant* may notify WADA and/or submit a complaint to CAS, which will determine whether a violation occurred. Where the *International Standard* is not being adhered to, the relevant *Anti-Doping Organization* will be required to rectify the breach.

ANNEX A to the INTERNATIONAL STANDARD ON PROTECTION OF PRIVACY AND PERSONAL INFORMATION

RETENTION TIMES

ADRV: anti-doping rule violation

AAF: adverse analytical finding

ATF: atypical finding

NAF: non-analytical finding

I. Referenced data will be deleted no later than the end of the calendar quarter following the expiry of the stated retention period.

II. For practical reasons, retention times are submitted to two categories; 18 months and 10 years.

III. Retention times can be extended in case of pending anti-doping rule violations.

<u>Module</u>	<u>Data</u>	<u>Retention periods</u>	<u>Remarks</u>	<u>Criteria</u>
<u>1 – Athlete</u> <u>Athlete (general)</u>	<u>Name</u> <u>Date of birth</u> <u>Sport discipline</u> <u>Gender</u> <u>Phone number(s)</u> <u>Email address</u> <u>Home address</u>	<u>as of time when Athlete is excluded from ADO's Testing pool:</u> <u>Indefinitely</u> <u>Indefinitely</u> <u>Indefinitely</u> <u>10 yrs</u> <u>10 yrs</u> <u>10yrs</u>	<u>Athlete data relevant for practical purposes and because of multiple violations.</u> <u>These data are not particularly sensitive.</u> <u>Managed by ADO.</u> <u>This can be retained indefinitely. ADOs should be allowed to keep a record of Athletes that have been part of their Testing pool. For elite Athletes, this information is public information anyway.</u> <u>10 years because of possible ADRV: AAF/ATF (stored Sample) or NAF</u> <u>10 years because of possible ADRV: AAF/ATF (stored Sample) or NAF</u> <u>10 years because of possible ADRV: AAF/ATF (stored Sample) or NAF</u>	<u>Necessity</u> <u>Necessity</u> <u>Necessity</u>
<u>2 – Whereabouts</u> <u>(except for the Athlete Passport program see section 8).</u> <u>Whereabouts</u>	<u>Whereabouts</u> <u>Failures</u> <u>Missed tests</u>	<u>as of date to which the data relate:</u> <u>18 months</u> <u>18 months</u> <u>18 months</u>	<u>Only small amount of Whereabouts is relevant to retain, but it is impossible to establish which part.</u> <u>Can be relevant to establish ADRV retrospectively</u> <u>Relevant to count three Strikes in 12 months time</u> <u>Relevant to count three Strikes in 12 months time</u> <u>If ADRV, will be kept as part of disciplinary file indefinitely (see section 7).</u>	<u>Necessity</u> <u>Necessity</u> <u>Necessity</u>
<u>3 – TUE</u>			<u>Destroying medical information makes it impossible for WADA to review TUEs retrospectively after TUE has lost its validity</u> <u>TUE information is largely medical and therefore specifically sensitive.</u> <u>Managed by ADO / TUEC.</u>	

Module	Data	Retention periods	Remarks	Criteria
<u>TUE</u>	<u>TUE approval forms</u> <u>TUE supp. med information TUE info not included:</u> <u>_(i) on the approval form;</u> <u>or</u> <u>_(ii) in the supporting</u> <u>_____ medical information</u>	<u>10 yrs as of approval date</u> <u>18 month from end of validity of TUE</u>	<u>Can be relevant in case of re-testing.</u> <u>Loses relevance after expiration of TUE except in case of re-application (and sensitive information).</u>	<u>Proportionality</u> <u>/Necessity</u> <u>Proportionality</u>
<u>4 – Testing</u>		<u>as of document creation date / as of first indication of AAF, ATF, ADRV or Sample collection</u>	<u>Long retention only relevant in case of AAF, ATF, ADRV or stored Sample(s).</u> <u>Managed by ADO.</u>	
<u>Testing</u>	<u>Mission orders</u> <u>Doping Control Form</u> <u>Chain of Custody</u>	<u>18 months / 10 yrs</u> <u>18 months / 10 yrs</u> <u>18 months/ 10 yrs</u>	<u>18 months if there is no indication of an ADRV/ 10 yrs if there is an indication of a possible ADRV, if the Sample is stored for possible re-testing or if it is part of a passport program.</u> <u>18 months if there is no indication of an ADRV/ 10 yrs if there is an indication of a possible ADRV, if the Sample is stored for possible re-testing or if it is part of a passport program.</u> <u>18 months if there is no indication of an ADRV/ 10 yrs if there is an indication of a possible ADRV, if the Sample is stored for possible re-testing or if it is part of a passport program.</u>	<u>Proportionality</u> <u>/Necessity</u> <u>Proportionality</u> <u>/Necessity</u> <u>Proportionality</u> <u>/Necessity</u>
<u>5 – Samples (lab)</u>			<u>Only positive Samples are a possible privacy issue</u> <u>Managed by Laboratory</u>	
<u>Samples</u>	<u>A Sample</u> <u>B Sample</u>	<u>Indefinitely / 10 yrs</u> <u>Indefinitely / 10 yrs</u>	<u>These Samples are anonymous, and may be retained indefinitely for scientific purposes.</u> <u>In case of an AAF, and if the Sample is identifiable, 10 yrs should be the maximum retention time.</u>	<u>Proportionality</u> <u>Proportionality</u>
<u>6 – Test results/Results management (forms/ documentation)</u>		<u>as of creation of relevant documents:</u>	<u>Relevant because of multiple violations and retrospective analysis</u> <u>Managed by ADO</u>	
<u>Results</u>	<u>Negative findings</u> <u>AAF</u> <u>ATF</u>	<u>10 yrs</u> <u>10 yrs</u> <u>10 yrs</u>	<u>Negative results have an historical value and keeping them could be in the interest of the Athlete.</u> <u>Necessary because of multiple violations.</u> <u>Necessary because of multiple violations.</u>	<u>Proportionality</u> <u>/Necessity</u> <u>Necessity</u> <u>Necessity</u>

Module	Data	Retention periods	Remarks	Criteria
7 – Disciplinary Rulings — (ADRV)			Relevant because of multiple violations. Managed by disciplinary body / sports federation / ADO.	
Disciplinary rulings	Sanctions under the Code Arbitral awards Relevant supporting documentation/files	Indefinitely Indefinitely Indefinitely	Should be kept indefinitely for legal and precedential value.	Necessity Proportionality
8 – Athlete Biological Passport*				
* Differentiation between Samples and results. As Samples are not used for directly establishing ADRV, Samples will not be stored, only results.				
* For blood there are no A or B Samples.				
* Only positive Samples are a possible privacy issue. Biological passport Samples are not positive Samples.				
Results	Results	10 yrs as of date results were obtained	For the biological passport (blood module), the endocrinological/steroidal urine modules or longitudinal profiling, the retention time for results is 10 yrs. 10 yrs when needed to support atypical/abnormal results/to refute Athlete's claims.	Necessity
Whereabouts	Whereabouts	10 yrs as of date the data relates to	For cases where circumstances warrant for negative results to be stored for future inclusion in the biological passport (blood module/endocrinological/steroidal urine modules): 10 yrs (only needed for limited amount of Athletes).	Necessity

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Rendering set	Standard

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Deletion	
Moved from	
Moved to	
Style change	
Format change	
Moved deletion	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

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Deletions	184
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Moved to	10
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Format changed	0
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