

## INTERNATIONAL STANDARD FOR THE PROTECTION OF PRIVACY AND PERSONAL INFORMATION (ISPPPI) (FOLLOWING THE FIRST CONSULTATION PHASE)

### SUMMARY OF MAJOR PROPOSED CHANGES FOUND IN THE FIRST DRAFT OF THE INTERNATIONAL STANDARD FOR THE PROTECTION OF PRIVACY AND PERSONAL INFORMATION (ISPPPI)

Changes are listed in the order in which they appear in the ISPPPI, not in order of importance.

- **General:** Further to revisions to the definition of “Signatory” as part of the Code review process, the ISPPPI was updated throughout to account for obligations applicable to WADA. Generally, all ISPPPI requirements will be applicable to WADA, however, certain clarifications were added where principal responsibility for implementation of a requirement (i.e., obtaining consent or establishing a valid legal ground to process personal information) rests with the anti-doping organization having authority over the athlete. Minor revisions were also made in Articles 5, 6, 7.2, 8.1 and 9 to address (i) stakeholder comments made during the first consultation phase; (ii) consistency with revisions to the Code and the International Standards; and (iii) drafting improvements.
- **Article 9.6 (Security):** The three-year periodicity requirement associated with the need to conduct an assessment of certain processing activities has been removed to provide anti-doping organizations with the flexibility to conduct such assessments at an appropriate frequency. A comment has been added for additional clarity.
- **Article 10 (Retention):** Changes were made to this Article to clarify that anti-doping organizations/WADA must use Annex A to the ISPPPI as the primary reference to establish retention periods, but that the general retention criteria in this Article remain relevant to address the retention of any records not specifically provided for in the Annex.
- **Annex A (Retention):** During the first consultation phase, stakeholders highlighted that since the implementation of the steroidal module of the Athlete Biological Passport (ABP) in 2014, all athletes are included in the ABP program. As a result, ten years has become the de facto applicable retention period for certain data (e.g., whereabouts data and testing documentation) for which there are currently two possible retention periods in Annex A to the ISPPPI (of 18 months or 10 years). Following consultation of relevant experts (including ABP experts), the following changes have been made to the retention periods in Annex A of the ISPPPI:
  - 2 – Whereabouts / 8 – Athlete Biological Passport:
    - The ten-year retention period has been limited to city and country-level whereabouts data, as well as to in-competition whereabouts data in order to strike an appropriate balance between the needs of the ABP program and the need to minimize retention of personal information (as required by the ISPPPI).
    - The retention period for all other whereabouts data has been reduced from 18 months to 12 months, to reflect the updated reference period in the Code to establish a whereabouts failure.
    - Section 8 (Athlete Biological Passport) has been generally updated to reflect the evolution of the ABP program.
  - 4 – Testing: The retention period for all data in this category (mission orders, DCFs, chains of custody) is now 10 years given the updates to the ABP program.

- 3 – TUE: The retention period for certain TUE-related information has been reduced from 18 months to 12 months to align with the shortest whereabouts retention period. An additional data category for rejected and incomplete TUEs has been added.