

**INTERNATIONAL STANDARD FOR THE PROTECTION OF PRIVACY AND PERSONAL INFORMATION  
(ISPPPI)  
SUMMARY OF MAJOR PROPOSED CHANGES (FOLLOWING THE SECOND CONSULTATION PHASE)**

The ISPPPI received a modest number of comments from stakeholders in both round 1 and round 2 of consultations, having been recently updated (in June 2018) outside of the ordinary consultation process. During the second phase of consultation, the ISPPPI received 23 comments, which were supplemented by in-person meetings between the ISPPPI drafting team and a number of stakeholders during the course of WADA's Annual Symposium on 13-14 March 2019.

Overall, stakeholder comments in both consultation rounds reflected general support for the ISPPPI as drafted and were aimed at further refining certain existing concepts and provisions. Minor revisions were made in both the first and second draft of the ISPPPI to reflect these refinements and make drafting improvements throughout the document.

The following sets out the key proposed changes resulting from the second consultation phase:

- The definitions of Third-Party Agent and Third Party (and related provisions and references thereto) were amended in light of discussions with stakeholders as well as revisions to the Code and other International Standards (notably, with respect to doping control coordinators, the role of national federations, and the ability for anti-doping organizations to delegate parts of their anti-doping program).
- Provisions related to the disclosure of information to law enforcement and other authorities, as well as the right of access to information (and exceptions thereto) were the subject of limited edits to account for stakeholder experiences related to disclosures to professional regulatory bodies, as well as supplementary rules surrounding the right of access under applicable laws.
- Further amendments were made to Annex A (including with respect to whereabouts failures, Therapeutic Use Exemptions, and Athlete Biological Passport data) to address operational challenges highlighted by stakeholders with regard to the changes proposed in the first draft of the ISPPPI.

Following the first round of consultations, the ISPPPI was also updated throughout to account for obligations applicable to WADA due to revisions to the definition of a Signatory and Anti-Doping Organization under the Code, as well as to clarify where principal responsibility for compliance rests with a specific organization. These changes, as well as certain definitions under the ISPPPI (e.g., Anti-Doping Activities and Third-Party Agent) may require further amendment to ensure alignment with the revised Code and International Standards.