

## WORLD ABILITYSPORT ANTI-DOPING DATA PROTECTION POLICY

June 2024

World Abilitysport is committed to protecting the privacy and personal information of athletes and other individuals involved in anti-doping activities.

This Data Protection Policy (the "Policy") is issued by World Abilitysport in accordance with the International Standard for the Protection of Privacy and Personal Information (ISPPPI) as set forth by the World Anti-Doping Agency (WADA). This Policy outlines World Abilitysport's main obligations and commitments towards the protection of personal data relating to anti-doping activities, including the collection, processing, and disclosure of personal information in connection with anti-doping activities.

### Scope

This Policy applies to all personal information that World Abilitysport collects, processes, and discloses in connection with anti-doping activities. This includes personal information related to athletes, athlete support personnel, and other individuals who are subject to World Abilitysport's Anti-Doping Rules and other applicable regulations.

This Policy applies to all World Abilitysport employees, consultants, governing board members, sports executive committees, commission members, and any other individuals who handle personal data related to anti-doping activities in the context of World Abilitysport anti-doping programme.

### Purpose

The purpose of this Policy is to ensure that World Abilitysport complies with the International Standard for Personal Data Protection in Anti-Doping (ISPPPI) and all other applicable data protection laws and regulations, including General Data Protection Regulation (GDPR) and other relevant regulations. World Abilitysport recognises the importance of protecting personal data and is committed to ensuring that all personal data is collected, processed, and disclosed in accordance with the principles of data protection.

### Principles

The following principles guide World Abilitysport collection, processing, and disclosure of personal data in relation to anti-doping activities:

- **Lawfulness, Fairness & Transparency:** World Abilitysport shall ensure that personal data is collected, processed, and disclosed in a lawful, fair, and transparent manner.
- **Purpose Limitation:** personal data shall only be collected, processed, and disclosed for specific and legitimate purposes related to anti-doping activities authorised under the World Anti-Doping Code and International Standard, provided such processing activities do not conflict with applicable privacy and data protection laws.

### **World Abilitysport**

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Registered Incorporated Charity (2713410 and 1011552)



- **Necessity & Proportionality:** World Abilitysport shall ensure that personal data is processed only where necessary and proportionate.
- **Data Minimisation:** World Abilitysport shall collect, process, and disclose only the minimum amount of personal data necessary for the purposes of anti-doping activities.
- **Accuracy:** World Abilitysport shall take reasonable steps to ensure that personal data is accurate and up to date.
- **Storage Limitation:** World Abilitysport shall retain personal data for no longer than necessary for the purposes of anti-doping activities.
- **Integrity & Confidentiality:** World Abilitysport shall ensure that personal data is kept secure and confidential.
- **Accountability:** World Abilitysport shall take responsibility for ensuring compliance with this Policy and all applicable data protection laws and regulations.

## Collection and Processing of Personal Data

World Abilitysport shall only collect personal data for specific and legitimate purposes related to anti-doping activities. Personal data shall be collected directly from the individual concerned, or from authorised sources where so allowed. World Abilitysport shall inform data subjects amongst other aspects of the purpose and legal basis for the processing of their personal data, the categories of personal data being processed, the recipients or categories of recipients of the personal data, and the data subject's rights under data protection law and the ISPPPI. World Abilitysport must communicate the processing purposes and other information to data subjects in a clear and easily understandable manner, using plain language.

World Abilitysport shall only process personal data for the purposes for which it was collected. World Abilitysport shall ensure that personal data is accurate and up-to-date and shall take reasonable steps to rectify any inaccuracies.

For the purposes of the anti-doping activities, World Abilitysport can collect the following, but not limited to, types of Information and/or data:

- **Athlete's Identity** (Full name, Date of Birth, Sport Discipline, Gender, Phone number(s), Email Address, Home Address, Organisations to which athlete belongs, Names and details of other persons, such as Medical Professionals, working with, treating or assisting athletes in the anti-doping context);
- **Whereabouts information** (including Failures and Missed Tests);
- **Medical and Biological Information** (Therapeutic Use Exemptions – TUE -, Testing – Mission Orders, Doping Control Forms, Chain of Custody -, Samples – A and B -, Details of Biological Samples collected etc.);
- **Test Results and Results Management;**
- **Disciplinary Rulings;**
- **Athlete Biological Passport.**



## Disclosure of Personal Data

World Abilitysport may disclose personal data for the purposes of anti-doping activities to WADA, National Anti- Doping Organisations (NADOs), Delegated Third Parties and service providers such as the International Testing Agency (ITA), other International Federations, Major Events Organisers, and other authorised third parties as further described in the ISPPPI. World Abilitysport shall ensure that any such disclosures are made in accordance with applicable data protection laws and regulations, and that appropriate safeguards are in place to protect personal data.

World Abilitysport shall ensure that any third-party recipients of personal data are bound by appropriate contractual or regulatory obligations to maintain the security and confidentiality of the data.

## Storage and Retention of Personal Data

World Abilitysport shall ensure that personal data is kept secure and confidential, and that appropriate technical and organisational measures are in place to prevent unauthorised access, use, or disclosure. In particular, World Abilitysport will take appropriate measures to ensure that personal data is processed securely and confidentially, including:

- implementing technical and organisational measures to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage;
- limiting access to personal data to authorised personnel with a legitimate need-to-know;
- implementing procedures to ensure the confidentiality and integrity of personal data, including secure transmission and storage;
- ensuring that third-party processors and service providers comply with GDPR and ISPPPI requirements.
- All data is stored in a secure, password protected, limited access, folder, only for the limited time that it is needed.

Access to personal data in connection with anti-doping activities shall be limited to authorised individuals who require access to perform their duties and responsibilities within the scope of their employment or contractual obligations with World Abilitysport.

IT System that will be used for collection, storage, and sharing, will be, but not limited to, the following;

- ADAMS
- World Abilitysport – Sports Management System (WA-SMS)
- Internal Systems through Microsoft SharePoint (password protected)
- Email (but never use names in the body of text, and any files shared are password protected)



Personal data shall be retained for no longer than necessary for the purposes of anti-doping activities and shall be securely disposed of when no longer required. World AbilitySport will retain personal data for no longer than necessary to fulfil the anti-doping purposes, in accordance with the ISPPPI.

### **Rights of Data Subject**

Data subjects have the right to access, rectify, and erase their personal data, as well as the right to restrict or object to its processing and the right to data portability, subject to certain limitations under data protection law.

World AbilitySport will provide individuals with access to their personal information upon request and in accordance with the procedures outlined in the ISPPPI and will take reasonable steps to correct or delete any inaccurate or incomplete information.

### **Training and Education**

World AbilitySport will provide training and education, within its financial means, to all World AbilitySport employees and individuals involved in anti-doping activities on World AbilitySport's data protection policies and procedures, as well as on the requirements of the ISPPPI.

### **Personal Data Breaches**

World AbilitySport shall have a procedure in place for responding to personal data breaches, which shall include without limitation steps to identify and assess the risk to the affected individuals, take appropriate corrective action, minimise the impact of the breach, and ensure that affected individuals are notified in a timely and appropriate manner, as required by applicable data protection laws, including the ISPPPI and GDPR.

World AbilitySport shall also have a procedure in place for documenting and recording any such data breaches and provide regular updates to the relevant authorities. World AbilitySport shall additionally ensure that the rights of data subjects are respected, and that the data is processed in a lawful and secure manner.

### **Compliance and Monitoring**

World AbilitySport will regularly review and monitor its data protection policies and procedures to ensure compliance with the ISPPPI and applicable laws and regulations. Any breaches of this Policy or the ISPPPI will be promptly investigated, and appropriate corrective actions will be taken.