



IBSA POLICY FOR ANTI-DOPING PERSONAL INFORMATION PRIVACY AND DATA PROTECTION ASSESSMENT

INTRODUCTION AND SCOPE

The purpose of this policy is to describe IBSA's procedures and practices to ensure that controls, including contractual controls, are in place to protect the confidentiality and privacy of the personal data shared and to ensure that the personal data is only processed for and on behalf of IBSA, in accordance with Article 9 of the International Standard for Privacy and Protection of Personal Information (ISPPPI).

The policy includes the process to record and monitor IBSA's ongoing compliance with the ISPPPI and all locally applicable privacy and data protection laws, especially the EU General Data Protection Regulation (GDPR).

RESPONSIBILITIES

An officer in charge of the implementation and follow-up of this policy and subsequent actions is appointed by IBSA. This Person is accountable for compliance with this International Standard and all locally applicable privacy and data protection laws. In this respect, he/she should regularly check on WADA ADeL Platform (<https://adel.wada-ama.org>) the different tools (templates, guidelines, trainings, etc.) made available to help ensuring compliance with the ISPPPI and locally applicable privacy and data protection laws.

IBSA shall take reasonable measures to ensure that the name and contact information of the Person so designated is made readily available to Participants should they request it.

Occasional audits may be conducted to monitor its ongoing compliance with the ISPPPI and all locally applicable privacy and data protection law.

IBSA'S POLICY FOR PROTECTING ANTI-DOPING PERSONAL INFORMATION

IBSA shall protect Personal Information proceeded by applying all possible 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.

IBSA shall ensure that any access to Personal Information by any 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.

Taking into account the sensitivity of the Personal Information being processed within anti-doping programs implementation, IBSA applies the highest possible security measures through only use of ADAMS system to maintain security of the personal data collected within TUEs, Testing, Whereabouts.

Other anti-doping connected activities (such as Education) may involve handling and thus need of Protection and in this regard, IBSA officer in charge of Personal Information Privacy will keep secured records of such information, not to be disclosed unless on a need-to-know basis.

IBSA is to use, as to best ensure Data Privacy requirements, the relevant and most updated templates proposed by WADA, such as:

- Doping Control Form,
- TUE application,
- Athlete Consent Form

When disclosing Personal Information to Third-Parties (such as IT-Service providers, laboratories or external Doping Control Officers) in connection with IBSA Anti-Doping activities, IBSA shall ensure that such Third-Party Agents are subject to appropriate controls, including contractual and technical 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 IBSA. IBSA ensures that the Third-Party Agents it works with provide sufficient guarantees, in accordance with the ISPPPI and the applicable laws, in respect of the technical security measures and organizational measures governing the Processing to be carried out.

IBSA RECORD OF THE PROCESSING OF PERSONAL INFORMATION FOR WHICH IBSA IS RESPONSIBLE

IBSA maintains a record of the Processing of Personal Information for which the organization is responsible.

This record describes:

- the general purposes of the Processing,
- a description of the types of Personal Information,



- the categories of potential recipients of the Personal Information,
- the safeguards used where Personal Information are disclosed to other Anti-Doping Organizations or Third Parties,
- the period for which the Personal Information will be stored or the criteria used to determine this period,
- and a general description of the technical and organizational security measures applied to the Personal Information.

The purpose of this record is to better ensure IBSA's effective oversight of its activities and to facilitate compliance with the ISPPPI.

With respect to the ADAMS database administered by WADA, WADA shall be solely responsible for maintaining a record reflecting the Processing of Personal Information in the database.

IBSA POLICY FOR ANTI-DOPING DATA PROTECTION ASSESSMENT

In the event of a Security Breach, IBSA officer appointed for Anti-Doping Data privacy shall record, evaluate, plan possible remedial action(s) and inform affected Participants or other Persons of the breach, where this breach is likely to affect significantly concerned persons' rights and interests.

The information must be provided as soon as reasonably possible once IBSA becomes aware of the details of the Security Breach and should describe the nature of the breach, the possible negative Consequences for concerned persons and any remediation measures taken or to be taken by IBSA.

IBSA shall assess its Processing of Anti-Doping Sensitive Personal Information and whereabouts information at least every three years, and in any case each time there are changes made to the ISPPPI or local applicable laws (GDPR), to determine the proportionality and risks of their Processing and to assess any measures, including privacy by design measures, that could/shall be taken to reduce the risks for the concerned participants.

IBSA shall ensure that staff Processing Personal Information of Participants collected within IBSA Anti-Doping programs implementation is subject to a statutory duty of confidentiality.