

## **WORLD TRIATHLON DATA PRIVACY POLICY**

### **Purpose**

The World Triathlon Anti-Doping Rules requires athletes and athlete support personnel to furnish a significant amount of personal information to World Triathlon and their relevant National Anti-Doping Organization (NADO).

The Administration of the World Triathlon Anti-Doping Program requires and results in employees and third-party contractor or other having access to a myriad of private and personal data.

As a result, it is essential that the World Triathlon, just like all other ADOs subject to the World Anti-Doping Code, appropriately protect the personal information that it processes both to meet legal standards and to ensure the continued confidence and trust of those involved in triathlon.

The purpose of this internal memo is to outline the reason behind these processes and their implementation. It has been prepared in accordance with World Triathlon's obligations under the International Standard for the Protection and Privacy of Personal Information (ISPPPI) and the GDPR.

### **Scope**

World Triathlon acknowledges its responsibility for ensuring that personal information processed in connection with all its anti-doping activities is protected as required by data protection and privacy laws, principles and standards, notably the ISPPPI and the GDPR.

There are a variety of safeguards taken by World Triathlon to ensure that it adheres to a set of minimum privacy protections when collecting and using athlete personal information such as information relating to whereabouts, doping controls and TUEs.

### **Applicable legislation: the ISPPPI**

World Triathlon respects and implements the ISPPPI and conforms to all its principles when collecting and handling personal information pursuant to the Code and its World Triathlon Anti-Doping Rules.

By respecting the principles of the ISPPPI, World Triathlon makes sure to apply appropriate, sufficient and effective privacy protections to the personal information it processes when conducting its anti-doping program, in recognition of the fact that personal information

gathered in the anti-doping context can impinge upon and implicate the privacy rights of persons involved in and associated with organized sport.

The World Triathlon Anti-Doping Rules recognize and affirm the importance of ensuring that the privacy rights of persons subject to anti-doping programs based on the World Anti-Doping Code are fully respected.

Because the ISPPPI requires personal data to be collected and processed on the basis of consent, or another legal basis, World Triathlon has made it clear both in the World Triathlon Anti-Doping Rules, which all World Triathlon athletes agree to comply with as a matter of eligibility, and the Athletes Agreement, which all athletes agree to as a condition of participating in World Triathlon events, that all athletes consent to World Triathlon's usage of their information; so long as this information is used in accordance with the ISPPPI and any other applicable data privacy laws.

Specifically, World Triathlon respects the ISPPPI principles with regards to personal information. Personal information is defined as including, but not being limited to, *information relating to an athlete's name, date of birth, contact details and sporting affiliations, whereabouts, designated therapeutic use exemptions, 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, such as medical professionals and other persons working with, treating or assisting an athlete in the context of anti-doping activities. Such information remains personal information and is regulated by the ISPPPI and by reference the World Triathlon Anti-Doping Rules for the entire duration of its processing, irrespective of whether the relevant individual remains involved in organized sport.

World Triathlon also fully complies with the ISPPPI with regards to sensitive personal information. Sensitive personal information is defined as *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*.

## **The applicable provisions in the World Triathlon Anti-Doping Rules**

For ease of reference, the relevant portions of the 2021 World Triathlon Anti-Doping Rules read as follows:

### **Article 14 Confidentiality and Reporting**

(...)

#### **14.6 Data Privacy**

**14.6.1** World Triathlon may collect, store, process or disclose personal information relating to *Athletes* and other *Persons* where necessary and appropriate to conduct its *Anti-Doping Activities* under the *Code*, the *International Standards* (including specifically

the *International Standard* for the Protection of Privacy and Personal Information), these Anti-Doping Rules, and in compliance with applicable law.

**14.6.2** Without limiting the foregoing, World Triathlon shall:

- i. Only process personal information in accordance with a valid legal ground;
- ii. Notify any *Participant* or *Person* subject to these Anti-Doping Rules, in a manner and form that complies with applicable laws and the *International Standard* for the Protection of Privacy and Personal Information, that their personal information may be processed by World Triathlon and other *Persons* for the purpose of the implementation of these Anti-Doping Rules;
- iii. Ensure that any third-party agents (including any *Delegated Third Party*) with whom World Triathlon shares the personal information of any *Participant* or *Person* is subject to appropriate technical and contractual controls to protect the confidentiality and privacy of such information.

### **Practical application**

As a condition of participation in triathlon all World Triathlon athletes agree and consent to sharing their personal information, sometimes sensitive, in the course of the mandatory World Triathlon anti-doping activities and procedures.

All World Triathlon athletes can be confident that any personal and sensitive information they share as a condition to and by virtue of their participation in triathlon is being protected by a variety of unyielding privacy safeguards.

Aided by World Triathlon legal counsel, World Triathlon is responsible for ensuring that any information that is processed in the day to day administration of the World Triathlon Anti-Doping Program is stored safely, dealt with and shared strictly in utmost confidentiality and retained only as long as necessary in respect of both the ISPPPI and the World Triathlon AD Rules.

All World Triathlon employees, third party contractors and ADO's with whom agreements are signed (sharing, testing, or other) have or will be required to sign Agreements and or contracts containing confidentiality clauses that respect both the ISPPPI and the GDPR.