

## **WORLD TRIATHLON INFORMATION NOTICE REGARDING THE USE OF ATHLETES PERSONAL DATA IN ADAMS**

### **Purpose of ADAMS**

ADAMS enables Anti-Doping Organizations (“ADOs”), such as World Triathlon, your relevant NADOs and WADA to conduct harmonized, coordinated and effective anti-doping programs and to fulfil their respective responsibilities arising under the World Anti-Doping Code (“Code”).

ADAMS may be used for scheduling In- and Out-of-Competition doping tests and managing related information, including Therapeutic Use Exemptions (“TUEs”), information related to athlete whereabouts, information about the results of anti-doping tests, managing the Athlete Biological Passport, and sanctions-related information relevant to individual athletes and other Persons.

WADA relies upon ADAMS to fulfil its responsibilities under the Code, including the performance of Out-of-Competition Testing, the review of TUEs, and its implication on anti-doping rule violation investigations and procedures.

### **Categories of Data Concerned**

ADAMS contains the following categories of data:

- Your unique ADAMS profile consisting of data relating to your identity (name, nationality, date of birth, gender, sport(s) and discipline(s) you compete in, organizations and/or sports federations to which you belong, an indication of whether you compete at an international or national level, and whether you are considered to be a National or International-Level Athlete in accordance with the World Triathlon Anti-Doping Rules and/or the Rules of your National Anti-Doping Organization);
- Data relating to your whereabouts (e.g., training, competitions, travel, periods spent at home, on vacation, or other regular or exceptional activities), including, each time you elect to use the “auto-location” reporting button on the ADAMS app, information about your mobile device’s location;
- Data relating to test distribution planning (for the testing pools in which you are included);
- Data relating to your TUE, if any;
- Data relating to Doping Control (test distribution planning, Sample collection and handling, laboratory analysis, results management, hearings and appeals); and
- Data relating to the Athlete Biological Passport.

Some of the above data may constitute protected personal data under national data protection or privacy laws where you reside.

## **Responsibility**

As your Custodian Organization, which is the Anti-Doping Organization that has primary responsibility for entering and managing your profile in ADAMS, World Triathlon (or in some cases your NADO) has created your unique ADAMS profile. You can identify your Custodian Organization by viewing the “Security” tab of your athlete profile. In addition, WADA will access and process certain of your data in ADAMS (i.e., TUE data, laboratory results, Athlete Biological Passport, sanctions and whereabouts data) to fulfil its responsibilities under the Code. Your Custodian Organization and WADA are responsible for protecting your information in accordance with applicable laws and WADA’s International Standard for the Protection of Privacy and Personal Information. WADA, moreover, has implemented strict contractual controls governing the use of ADAMS by ADOs and others.

You will be responsible for ensuring that all information that you enter into the system or that is entered on your behalf by other parties, such as your agent or coach, is accurate. Where your Custodian Organization uses the ADAMS whereabouts module, you will be responsible for ensuring that the information you provide relating to your whereabouts is accurate and up-to-date. Please note that failure to provide and/or update accurate whereabouts information is likely to constitute an anti-doping rule violation, whether the failure is intentional or negligent.

You will be provided with a confidential password in order to enter your own data onto ADAMS and you will be responsible for keeping this password confidential at all times. Should you inadvertently disclose your password, you should contact your Custodian Organization immediately and a new password will be assigned to you.

## **Legal basis**

Your Custodian Organization and WADA process your personal data relying on different legal bases, depending on the particular context in which it is processed. This includes processing in circumstances where it is permitted or required to do so under applicable anti-doping laws, including Swiss anti-doping and sports laws; where the processing is necessary to meet the substantial public interests served by eliminating doping in sport; where the processing is based on your consent, which may subsequently be withdrawn; and where necessary to meet legitimate interests. The Anti-Doping Organization that created your profile in ADAMS may be relying on these or alternative legal bases, including applicable anti-doping laws.

## **Disclosures**

Part of your ADAMS profile created by your Custodian Organization may be shown to other ADOs using ADAMS to ensure that only a single athlete profile for you is created.

The Custodian Organization and WADA, where appropriate, may enable other ADOs and service providers to access certain of your information appearing in ADAMS to enable them to administer anti-doping programs. In particular, the Custodian Organization shall grant WADA the authorization to disclose your whereabouts information to other Anti-Doping Organizations so that such Anti-Doping Organizations are able to fulfil their obligations pursuant to the Code.

Where this occurs, such ADOs and service providers also must abide by strict contractual controls and will be responsible for protecting your information in accordance with applicable laws and WADA's International Standard for the Protection of Privacy and Personal Information.

These other ADOs may include, as relevant or appropriate: national Olympic committees, national Paralympic committees, major event organizations such as the International Olympic Committee and International Paralympic Committee, international federations and national anti-doping organizations. These ADOs are granted access on a need-to-know basis in accordance with the Code. By viewing the "Security" tab on your ADAMS profile, you can learn which organizations have access to your data.

WADA and the organizations listed above will not disclose any of your data other than to authorized persons within their organizations on a need-to-know basis; and each of the organizations accessing and using ADAMS may only do so in order to fulfil their responsibilities and obligations arising under the Code, which primarily involves the establishment of anti-doping programs and ensuring appropriate information sharing as provided for under the Code.

If you are found to have committed an anti-doping rule violation and receive a sanction as a result, the respective sanctions, your name, sport, Prohibited Substance or Method, and/or tribunal decision, may be publicly disclosed by your Custodian Organization and relevant ADOs, in accordance with the Code.

### **International transfers**

Your data may be made available through ADAMS to persons or parties located outside the country where you reside. For example, your information will be shared with WADA, established in Switzerland and Canada, and may be shared with ADOs in countries where you may train or participate in sporting events. The data protection and privacy laws of these countries may not always be equivalent to those in your own country. In any case, ADOs have to comply with WADA's International Standard for the Protection of Privacy and Personal Information.

Such transfers are a necessary consequence of your participation in organized sport and facilitate the strong public interests served by eliminating doping in sport. In WADA's case, the transfers are made to two countries, Canada and Switzerland, that have been deemed to provide adequate protection by a number of regional and national data protection agencies, as well as the European Commission. In the event your information is transferred to another country, including Canada and Switzerland, it will be subject to the laws of that country and may be disclosed to or accessed by the courts, law enforcement and other public authorities in accordance with those laws.

### **Rights**

You may have certain rights under applicable laws and under WADA's International Standard for the Protection of Privacy and Personal Information, including rights to access, rectification, restriction, opposition and deletion, and remedies with respect to any unlawful processing of your data. You also may have a right to lodge a complaint with a national regulator responsible

for data protection in your country. To the extent you have questions or concerns about the processing of your data, you may consult with your Custodian Organization and/or WADA (privacy@wada-ama.org), as appropriate.

## **Security**

ADAMS is hosted in data centers in Canada. Strong technological, organizational and other security measures have been applied to ADAMS to maintain the security of the data entered onto ADAMS. In addition, WADA and ADOs have put in place internal and contractual guarantees to ensure that your data remain confidential and secure pursuant to their commitments under the International Standard for the Protection of Privacy and Personal Information.

## **Data retention**

Your data will be retained in ADAMS for the duration and in accordance with the criteria set out in Annex A to WADA's International Standard for the Protection of Privacy and Personal Information. For instance, if your Custodian Organization uses ADAMS for TUEs and you are granted a TUE, the TUE approval forms will be stored electronically in ADAMS for a period of ten years following the approval date. The period of ten years represents the time period during which an action may be commenced for an anti-doping violation under the Code. Supporting medical and other TUE-related information is only retained for a period of 18 months from the end of the validity of the TUE. Data may be retained for a longer period where required by law or for the purpose of an anti-doping investigation or proceeding.

## **Right to object**

You understand that if you object to the processing of your data, it still may be necessary for your Custodian Organization and WADA to continue to process (including retain) certain of your data to fulfil obligations and responsibilities arising under the Code, International Standards, and/or national anti-doping laws, notwithstanding your request; including for the purpose of investigations or proceedings related to a possible anti-doping rule violations; or to establish, exercise or defend against legal claims involving you, WADA and/or an ADO.

You understand that objecting to the processing, including disclosure, of your data may prevent you, your Custodian Organization, WADA or other ADOs from complying with the Code and relevant WADA International Standards, which could have consequences for you, such as an anti-doping violation under the Code or the inability to participate in sporting events.

*If you have any questions about this Notice, please do not hesitate to contact World Triathlon directly at [Jeanne.courbe@triathlon.org](mailto:Jeanne.courbe@triathlon.org)*