



## ATHLETE'S INFORMATION NOTICE ON ADAMS

The International Golf Federation (IGF) has an obligation to inform *Participants*, such as *Athletes*, that it *Processes* their *Personal Information*. The purpose of this notice is to complement the general information provided in the IGF Privacy Agreement for the IGF Games Registration & Regulations process for Athletes and inform *Athletes* specifically about *Processing* of their *Personal Information* through the Anti-Doping Administration and Management System "ADAMS".

The data you submit to the IGF through the online IGF Games Registration and Regulations form for Athletes may be used to create or update your profile in ADAMS. This profile and any anti-doping information associated with this profile may be accessible to other relevant *Anti-Doping Organisations* through ADAMS.

Once the profile has been created or updated, the IGF may then generate a personal athlete user account in ADAMS for you and an associated third party account for any third party to whom you are delegating whereabouts (if applicable). You will require a username and password for the initial set-up of your account before using it for anti-doping purposes such as submitting whereabouts.

When you submit whereabouts in ADAMS (or a third party submits whereabouts on your behalf), you do so with the understanding that the whereabouts filings will be shared through ADAMS with other *Anti-Doping Organisations* or Testing Authorities that may test you, such as those stated in the IGF Games Registration and Regulations form for Athletes.

The definitions of the terms capitalised and in italics in this notice can be found on page 6 of this notice and have been extracted from WADA's [International Standard for the Protection of Privacy and Personal Information](#). The table of anti-doping data retention times extracted from the ISPPPI (Annex A) can be found on pages 7 to 10.

WADA's full ADAMS Terms of Use and ADAMS Privacy Policy can be consulted in the [ADAMS Help Center](#).

Should this notice be subject to any changes before the end of the Tokyo 2020 Olympic Games, the IGF will inform the relevant athletes accordingly.

### Processing Data in ADAMS

You are being asked to read this Athlete's Information Notice on ADAMS to ensure that you are aware that some *Personal Information* related to you will be used and processed by the IGF through ADAMS, a web-based data management system developed and administered by the World Anti-Doping Agency ("WADA"). This information notice is intended to provide you with more information on ADAMS and how your *Personal Information* will be used in connection with ADAMS.



## ATHLETE'S INFORMATION NOTICE ON ADAMS

### Purpose of ADAMS

ADAMS enables *Anti-Doping Organisations* (“ADOs”), such as the IGF, the International Olympic Committee and WADA to conduct harmonised, coordinated and effective anti-doping programs and to fulfil their respective responsibilities arising under the World Anti-Doping 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 World Anti-Doping 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, organisations 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 rules of your International Federation and/or National Anti-Doping Organisation);
- 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.



## ATHLETE'S INFORMATION NOTICE ON ADAMS

### Responsibility

Your custodian organisation, which is the *Anti-Doping Organisation (ADO)* that has primary responsibility for entering and managing your profile in ADAMS, has the ability to create or update your unique ADAMS profile. You can identify your custodian organisation 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 World Anti-Doping Code. Your custodian organisation 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 organisation 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 into 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 organisation immediately and a new password will be assigned to you.

### Legal basis

Your custodian organisation 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 ADO 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 organisation may be shown to other ADOs using ADAMS to ensure that only a single athlete profile for you is created.

The custodian organisation and WADA, where appropriate, may enable other ADOs and service providers/*Third Party Agents* to access certain of your information appearing in ADAMS to enable them



## ATHLETE'S INFORMATION NOTICE ON ADAMS

to administer anti-doping programs. In particular, the custodian organisation shall grant WADA the authorisation to disclose your whereabouts information to other ADOs so that such ADOs are able to fulfil their obligations pursuant to the World Anti-Doping 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 Organisations such as the International Olympic Committee, international federations and National Anti-Doping Organisations. These ADOs are granted access on a need-to-know basis in accordance with the World Anti-Doping Code. By viewing the "Security" tab on your ADAMS profile, you can learn which organisations have access to your data.

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



## ATHLETE'S INFORMATION NOTICE ON ADAMS

### 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 organisation and/or WADA ([privacy@wada-ama.org](mailto:privacy@wada-ama.org)), as appropriate.

### Security

ADAMS is hosted in data centers in Canada. Strong technological, organisational 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 (see pages 7 to 10 of this notice). For instance, if your custodian organisation 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 World Anti-Doping Code. Supporting medical and other TUE-related information is only retained for a period of 12 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 organisation and WADA to continue to *Process* (including retain) certain of your data to fulfil obligations and responsibilities arising under the World Anti-Doping 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 organisation, WADA or other ADOs from complying with the World Anti-Doping Code and relevant WADA International Standards, which could have consequences for you, such as an anti-doping violation under the World Anti-Doping Code or the inability to participate in sporting events.



## ATHLETE'S INFORMATION NOTICE ON ADAMS

### Definitions

The following definitions have been extracted from WADA's International Standard for the Protection of Privacy and Personal Information. The definitions of the terms within this document that are capitalised but not in italics and not specific to the IGF can be found in the World Anti-Doping Code and/or the relevant WADA International Standards.

*Anti-Doping Activities:* Anti-doping Education and information, test distribution planning, maintenance of a Registered Testing Pool, managing Athlete Biological Passports, conducting Testing, organizing analysis of Samples, gathering of intelligence and conduct of investigations, *Processing* of TUE applications, Results Management, hearings, monitoring and enforcing compliance with any Consequences imposed, and all other activities related to anti-doping to be carried out by or on behalf of an *Anti-Doping Organisation*, as set out in the World Anti-Doping Code and/or the International Standards.

*Anti-Doping Organisation (ADO):* WADA or a Signatory that is responsible for adopting rules for initiating, implementing or enforcing any part of the Doping Control process. This includes, for example, the International Olympic Committee, the International Paralympic Committee, other Major Event Organisations that conduct Testing at their Events, International Federations, and National Anti-Doping Organisations.

*Athlete:* Any Person who competes in sport at the international level (as defined by each International Federation) or the national level (as defined by each National Anti-Doping Organisation). An *Anti-Doping Organisation* has discretion to apply anti-doping rules to an *Athlete* who is neither an International-Level Athlete nor a National-Level Athlete, and thus to bring them within the definition of "*Athlete*." [the full definition can be found in the World Anti-Doping Code].

*Athlete Support Person:* Any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other Person working with, treating or assisting an Athlete participating in or preparing for sports Competition.

*Participant:* Any *Athlete* or *Athlete Support Person*.

*Personal Information:* Information, including without limitation *Sensitive Personal Information*, relating to an identified or identifiable *Participant* or relating to other Persons whose information is *Processed* solely in the context of an *Anti-Doping Organisation's Anti-Doping Activities*. It is understood that *Personal Information* includes, but is not limited to, information relating to an *Athlete's* name, date of birth, contact details and sporting affiliations, whereabouts, designated Therapeutic Use Exemptions (if any), 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 this Standard for the entire duration of its *Processing*, irrespective of whether the relevant individual remains involved in organized sport.

*Processing* (and its cognates, *Process* and *Processed*): Collecting, accessing, retaining, storing, disclosing, transferring, transmitting, amending, deleting or otherwise making use of *Personal Information*.

*Sensitive Personal Information:* *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 biometric and genetic information.

*Third-Party Agent:* Any Person that *Processes Personal Information* on behalf of, as delegated by, or as otherwise engaged by an *Anti-Doping Organisation* in the context of the *Anti-Doping Organisation's* own *Anti-Doping Activities* including, without limitation, a Delegated Third Party and any subcontractors.





## ATHLETE'S INFORMATION NOTICE ON ADAMS

Extracted from [2021 International Standard for the Protection of Privacy and Personal Information](#)

### ANNEX A: RETENTION TIMES

ADRV: *Anti-doping rule violation*  
 AAF: *Adverse analytical finding*  
 ATF: *Atypical finding*  
 APF: *Adverse passport finding*  
 ATPF: *Atypical passport finding*

- I. Referenced data will be deleted no later than the end of the calendar quarter following the expiry of the stated retention period.
- II. Retention times are limited to two categories: Twelve (12) months and ten (10) years. The period of ten (10) years represents the time period during which an action may be commenced for an anti-doping violation under the *Code*. The period of twelve (12) months represents the time period relevant to count three (3) whereabouts failures giving rise to an anti-doping rule violation, and is also applied to certain incomplete documentation and *TUE*-related information.
- III. Retention times can be extended in case of pending or reasonably anticipated anti-doping rule violations, investigations, or other legal proceedings.

Module	Data	Retention Periods	Remarks	Criteria
1 – Athlete		:	<i>Athlete</i> data relevant for practical purposes and for notification purposes in the event of an ADRV. These data are not particularly sensitive.	
<i>Athlete</i> (general)	Name, Date of birth, Sport Discipline and Gender	10 yrs as of time when <i>Athlete</i> is excluded from ADO's <i>Testing</i> program or as of time other data categories have been deleted (see, e.g. Section 6 - ADRV), whichever is later	Necessary to notify of ADRV and to keep a record of <i>Athletes</i> included in an ADO's <i>Testing</i> program.	Necessity
	Contact information (phone number (s), email address, mailing address)	10 yrs as of time when <i>Athlete</i> is excluded from ADO's <i>Testing</i> program	Same as above.	Necessity

## ATHLETE'S INFORMATION NOTICE ON ADAMS

Module	Data	Retention Periods	Remarks	Criteria
<b>2 – Whereabouts*</b> *(except for city, country, and <i>In-Competition</i> whereabouts information, which are needed for the <i>Athlete Biological Passport</i> -see section 7)	Whereabouts	12 months as of end of the whereabouts quarter for which the data was submitted	Relevant to count 3 whereabouts failures in 12 months' time.	Necessity
	Whereabouts failures (filing failures and missed tests)	10 years as of date of whereabouts failure	Relevant to count 3 whereabouts failures in 12 months' time and to other possible ADRVs. If ADRV, will also be kept as part of results management file (see section 6).	Necessity
<b>3 – TUEs</b>  <b>TUE</b>	TUE certificates and rejected TUE decision forms	10 yrs as of certificate date/date of rejection decision	Can be relevant in case of re-Testing or other investigations.	Proportionality/ Necessity
	TUE application forms and supp. med information and any other TUE info not otherwise expressly mentioned herein.	12 months from end of validity of TUE	Loses relevance after expiration of TUE except in case of re-application.	Proportionality/Necessity
	Incomplete TUEs	12 months from date of creation	Can be relevant in case of re-application.	Proportionality



## ATHLETE'S INFORMATION NOTICE ON ADAMS

Module	Data	Retention Periods	Remarks	Criteria
<b>4 – Testing</b>				
<i>Testing</i>	Doping Control Forms (DCF's)	10 yrs as of <i>Sample</i> collection date	DCF's, associated mission/Testing orders, and chain of custody documents are relevant for <i>Athlete Biological Passport</i> and in case of <i>re-Testing of Samples</i> . If ADRV, will also be kept as part of results management file (see section 6).	Proportionality/Necessity
	Mission/Testing orders	Retained until all associated DCF's have been deleted	Same as above.	Proportionality/Necessity
	Chain of custody	10 yrs as of document creation date	Same as above.	Proportionality/Necessity
	Incomplete <i>Testing</i> documentation or documentation not matched to a <i>Sample</i>	12 months as of document creation date	Documentation that is incomplete or not matched to a <i>Sample</i> typically results from a data entry error and is discarded after a short delay for data integrity purposes.	Proportionality
<b>5 – Test results/Results Management</b>				
	Analytical test results (incl. AAF/ATF), laboratory reports, and other associated documentation	As of <i>Sample</i> collection date / date of creation of relevant documents:  10 yrs*	Necessary because of multiple violations and retrospective analysis. If ADRV, will also be kept as part of results management file (see section 6).  *Subject to the criteria and requirements of the <i>Code/International Standards</i> , analytical data resulting from <i>Sample</i> analysis and other <i>Doping Control</i> information may, in certain circumstances, be kept beyond the applicable retention period for research and other purposes permitted by Article 6.3 of the <i>Code</i> . Samples and data must be processed to ensure they cannot be traced back to an athlete before being used for such secondary purposes. 10 years is the maximum retention time for identifiable data and <i>Samples</i> . See the <i>International Standard</i> for Laboratories for details.	Necessity  Proportionality/Necessity

## ATHLETE'S INFORMATION NOTICE ON ADAMS

Module	Data	Retention Periods	Remarks	Criteria
<b>6 –Proceedings and Decisions (ADRV)</b>		As of date of final decision:	<b>Managed by disciplinary body / sports federation / ADO.</b>	
Decisions and proceedings	Sanctions and Decisions under the Code	Longer of 10 yrs or duration of sanction*	Necessary because of multiple violations and possible duration of sanctions.  * Decisions (e.g. CAS decisions) can be important legal precedents and part of the public record; in such cases, ADOs may decide to retain a decision beyond the applicable retention period.	Necessity  Proportionality/Necessity
	Relevant documentation/files (incl. AAF or whereabouts failure record, case files, laboratory and ABP documentation packages, etc.)	Longer of 10 yrs or duration of sanction	Necessary because of multiple violations and possible duration of sanctions.	Necessity
<b>7 – Athlete Biological Passport</b>				
Results	Biological variables, ATPF, APF, APMU reports, expert reviews and other supporting documentation.	10 yrs as of date of match between results and Doping Control Form	Necessary because of multiple violations and to analyze or review biological variables, APMU reports and expert reviews over time.	Necessity
Whereabouts	Whereabouts (only city, country and <i>In-Competition</i> whereabouts)	10 yrs as of end of the whereabouts quarter for which the data was submitted	Needed to support atypical/abnormal results, or to refute <i>Athletes'</i> claims.	Proportionality/Necessity