



Anti-Doping Privacy Notice

World Sailing is the international governing body for the sport of sailing and is a signatory to the World Anti-Doping Code (the Code) and is responsible for implementing an anti-doping program in World Sailing Anti-Doping Code. This privacy notice describes how we will collect, use and share personal information about you to run our anti-doping program and create a clean sport environment for all athletes. Sections in this notice are:

- ❖ Types of Personal Information
- ❖ How and Why We Use this Information
- ❖ Who We Share Personal Information With
- ❖ Your Rights
- ❖ Safeguards and Retention
- ❖ Fair & Lawful Processing
- ❖ International Transfer of Data
- ❖ Contact Us

Types of Personal Information

The types of personal information we collect depend on your level as an athlete or your role in sport. It will also depend on how the anti-doping rules apply to you.

For example, if you need a therapeutic use exemption, you will need to provide us with medical information. If you are charged with an anti-doping rule violation, you may need to provide us with evidence in your defence. If you are not an athlete, we still may need to collect personal information about you, like education data and identifiers, but we will not ask you for whereabouts or need you to participate in anti-doping testing.



Information that identifies or is identifiable to you, like your name, contact information, date of birth, gender, sport nationality, and the sports you participate in.



Education data we need to make sure you are receiving anti-doping education, like the courses you complete, the dates you took them, and your assessment scores.



Whereabouts information that indicates where you can be found for anti-doping testing (for example, addresses for regular activities like training, work or school and for the location(s) where you will be available for testing during a daily one-hour time slot). We will tell you if you need to provide us with this information.



Testing data that is created when we collect samples from you for an anti-doping test. (for example, doping control forms, type of test, sample code numbers, responses and information provided by you during a sample collection session) and the laboratory results from the analysis of your samples.



Athlete Biological Passport (ABP) data, for example, biological passport ID, blood and steroid biological marker values and ratios, and expert recommendations and assessments. The ABP is another tool to identify doping based on the analysis of laboratory results obtained from anti-doping samples.



Medical information, if you need to apply for a **Therapeutic Use Exemption** because you have a medical condition and need to use a substance or a method that is normally not allowed to be used.



Results management information, if we believe you have broken anti-doping rules. This includes information about the **anti-doping rule violation** you are charged with, evidence you provide in defense of a charge, and the decision on whether or not you will receive a sanction.



Investigations information if we suspect you may have broken anti-doping rules. This can include information or evidence obtained from open source searches, from witnesses and other confidential sources, or through cooperation with law enforcement agencies.

How and Why We Use Personal Information

Our role as an anti-doping organization (ADO) is to detect, deter and prevent doping in sport, in accordance with the Code, the International Standards (IS), and World Sailing Anti-Doping Code. This involves using personal information to carry out the following anti-doping activities:

Anti-Doping Activities	Main Personal Information Types Used for Each Activity							
								
Providing anti-doping education to you.								
Planning and conducting anti-doping tests, and locating you for these tests using the whereabouts information you submit.								
Analyzing the results from your biological samples.								
Analyzing and following up on the recommendations and results of your passport (Athlete Biological Passport or ABP).								
Enforcing World Sailing Anti-Doping Code by identifying anti-doping rule violations, issuing charges, and managing related proceedings.								
Processing requests to grant or recognize any therapeutic use exemptions (TUE) you apply for.								
Gathering intelligence and conducting investigations to better target testing activities and identify anti-doping rule violations, including cooperating with law enforcement.								
Communicating with you for the purposes described above.								
Coordinating and collaborating with other ADOs, for example, by sharing intelligence to better target our testing activities or by sharing information about our education program to avoid duplication.								
Reporting on our anti-doping activities to WADA to demonstrate our compliance with the Code and International Standards								

We also maintain records to improve, monitor and report on our anti-doping activities. This can include creating statistics by aggregating personal information. For example, we create statistics about anti-doping tests we conduct and anti-doping rule violations for which we are the results management authority.

Who We Share Personal Information With

We may need to share your personal information with the following individuals and organizations to run our anti-doping program and respect the Code:

- ❖ **Individuals you authorize** to receive or share your personal information, like an agent, coach, doctor, or a parent or guardian;

- ❖ **Code Signatories** that have testing authority, sample collection authority, or results management authority over you, like a National Anti-Doping Organization, International Federation, or Major Event Organizers;
- ❖ **WADA** (the World Anti-Doping Agency), that ensures all Code Signatories respect the rules of the Code. WADA also operates and manages **ADAMS***, a platform hosted in Canada to which we will upload your personal information. Using ADAMS facilitates the collaboration and sharing of information needed to run our anti-doping program.
- ❖ **Laboratories and Athlete Passport Management Units** that analyze anti-doping samples and the Athlete Biological Passport. They are subject to the International Standard for Laboratories, and only have access to coded data (based on sample codes or passport IDs);
- ❖ **Delegated third parties and other service providers** that we hire to help us carry out anti-doping activities and maintain our operations. We require delegated third parties and service providers to agree to strict contractual controls designed to protect your personal information.
- ❖ **Public authorities** responsible for enforcing sport and anti-doping laws and for investigating offences tied to doping in sport.

If you are found to have committed an anti-doping rule violation and receive a sanction as a result, then we may need to publish your name, sport, the anti-doping rule violated and why it was violated, as well as the consequences for you.

For details about ADAMS, associated mobile apps like Athlete Central, and how WADA will process your personal information, review the ADAMS Privacy Policy (<https://adams-help.wada-ama.org/hc/en-us/articles/360012071820-ADAMS-Privacy-Policy>) or contact WADA at privacy@wada-ama.org

Your Rights

You have rights with respect to your personal information under the [International Standard for the Protection of Privacy and Personal Information](#) and under data protection laws, including rights to access, rectification, restriction, opposition and deletion (in certain circumstances), and remedies with respect to any unlawful processing of your data. You also have the right to lodge a complaint with us.

Because anti-doping is a mandatory feature of organized sport, it still may be necessary for us, WADA, and other ADOs and organizations to continue to process your personal information to fulfill obligations under the Code, the International Standards, or national anti-doping or sport laws, despite your objection to such processing or withdrawal of consent (where applicable). This includes processing for investigations or proceedings related to possible ADRVs, as well as processing to establish, exercise or defend against legal claims involving you, WADA and/or an ADO. Objecting or withdrawing consent could also have consequences for you, such as triggering your non-compliance with the Code and IS, as well as the World Sailing Anti-Doping Code; producing an ADRV (e.g., under Article 2.3 of the Code – Evasion, Refusal or Failure to Submit to Sample Collection); or preventing you from participating in sporting events.

To the extent you have questions or concerns about the processing of your data, you may consult WADA at privacy@wada-ama.org or you may Contact Us (information below) to exercise your rights or if you have questions or concerns about how we handle personal information.

Safeguards & Retention

We have adopted measures, including administrative, technical, physical and contractual measures, to protect personal information in our custody and control against theft, loss and unauthorized access, use, modification or disclosure.

We restrict access to personal information on a need-to-know basis to employees and authorized delegated third parties and service providers who require access to fulfil their designated functions. The anti-doping organizations we share personal information with are bound by the same standards as us when they handle your personal information. These standards are described in the [International Standard for the Protection of Privacy and Personal Information](#). They include protecting your personal information, deleting it when no longer needed, being transparent, and allowing you to exercise rights like the right to access your personal information.

Your personal information will be kept in accordance with the criteria and retention periods set out in [Annex A of the ISPPPI](#). Retention periods in Annex A can be extended where required by law or for the purpose of conducting an anti-doping investigation or proceeding.

Fair & Lawful Processing

We process your personal information where necessary and proportionate to our anti-doping program. Under data protection laws, we rely on the following “legal grounds” or “bases” to process personal information for anti-doping activities:

- ❖ With your consent, for example when you apply for a TUE or enter one of our events;
- ❖ To comply with World Sailing Anti-Doping Code and WADA Code;
- ❖ To serve substantial public/World Sailing community interest to eliminate doping in Sailing; and
- ❖ To fulfil a legitimate interest, tied to the detection, deterrence and prevention of doping in sport, such as protecting athlete health and the intrinsic values and spirit of sport.

International Transfer of Data

Your personal 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, which is 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.

Contact Us

If you have any questions about how we handle personal information, or have any complaints, please contact us at legal@sailing.org. If you are not satisfied with how we have handled your complaint, you may notify WADA at compliance@wada-ama.org or privacy@wada-ama.org. WADA will handle the notification in accordance with the International Standard for Compliance by Signatories.