

## **Extract of Privacy policy**

This is an extract of the Privacy Policy of Anti-Doping Sweden AB. For the full text we kindly refer to the text in Swedish. Would there be any contradictions or deviations between the two texts the version in Swedish will take precedence.

#### Processing of personal data

The anti-doping business is a global issue. The World Anti-Doping Code (the "Code") is the basis for how the anti-doping work is executed. In Sweden, Anti-Doping Sweden AB ("ADSE") is responsible for the national anti-doping program.

In our day-to-day operations, we process personal data, as it's necessary for us to be able to carry out anti-doping work in accordance with the Code and the mandatory international standards. The Swedish version of the Code can be found in the Swedish Anti-Doping Regulations ("IDR").

When you (for example an athlete, a coach, a doping control officer, a consultant or an elected representative of an association) comes into contact with our business, your personal data is processed by us. We only process your personal data for specific purposes and when we have a legal basis to do so.

This Privacy Policy describes how ADSE, in its capacity as a data controller, processes personal data in accordance with the General Data Protection Regulation (EU Regulation 2016/679) (hereinafter referred to as the "**GDPR**"). That means it's us who "determines" why we need to process your personal data and that it is us which is primarily responsible.

If you have any questions or thoughts about the policy and/or our processing of your personal data, you are welcome to contact us at: dataskyddsombud@antidoping.se.

## Purposes of the processing of personal data

#### The purpose of administer and implement the anti-doping program

#### Why we process your personal data for this purpose.

In order for us to be able to carry out all the different parts of the anti-doping work, it is necessary for us to process personal data of you who are, for example athletes, doping control officers or work in any part of the anti-doping work.



Within the framework of anti-doping work we will for example:

- handle cases on therapeutic use exemptions and appeal decisions on such exemptions,
- plan, coordinate and administer "whereabout information",
- plan, coordinate and carry out doping controls,
- handle, decide on, provide information on and appeal decisions on antidoping rule violations, and
- collect, process, analyse and share information relating to possible antidoping rule violations.

We receive the information we process directly from you or from the national or international sports federations, sports clubs, from individuals, from common databases, such as telephone registers, address providers or information made available on the internet. It concerns for example your name, age, sport, contact details but also (if applicable) sensitive personal data about health, genetic data or biometric data to uniquely identify you. We can also process personal data about completed education in anti-doping matters.

The processing is based on the legal basis of fulfilling a task of public interest, in accordance with the Swedish Act (2022:926) of the processing of personal data in sports' anti-doping work.

#### With whom do we share your personal data?

In the anti-doping work, we will cooperate with other anti-doping organizations and with authorities and your data may, if deemed necessary or if we have a legal obligation, be shared with them. In some cases, our work is carried out by a contractor of ours who then gets access to your personal data. In these cases, we follow current regulations, which means that the recipient may not handle the personal data in any other way than according to our written instructions and in accordance with what is described in this policy. If you are suspected of an anti-doping rule violation, your association, your national and international sports federation and the World Anti-Doping Agency ("WADA") will provide some of your personal data. Where appropriate, the Doping Panel, the Supreme Sports Tribunal and the Court of Arbitration for Sport (CAS) can also obtain your personal data. If you apply for a therapeutic use exemption ("TUE"), members of Anti-Doping Sweden's TUE Committee will have access to your health information. If you are part of one of the Swedish whereabout pools (Registered Testing Pool or Testing Pool), your information will be available in ADAMS and may be shared with other organizations (other anti-doping organization, your international sports federation and WADA) that

need to obtain the data for the fulfillment of their duties according to the Code. See also section "Where we store your data - transfer of personal data within the framework of anti-doping work" below.

#### How long do we store your personal data?

We have a special policy for storage times for this purpose. You can view the policy **here**.

### The purpose of administer training and courses

In order for us to be able to administer and carry out seminars, courses or educational activities we need to process your personal data. We do this, for example, when you contact us with questions, after registration and for implementation. The information normally comes from you when you contact us or register, but it can also come from your club, your sports federation or from publicly available sources. The information we process is normally name, contact details, sport, club and sports federation.

The legal basis for this processing is that we fulfil a contract with you.

Part of some educations and courses is that they provide a certificate of completed course, which can be shown/is a requirement for participation in the national teams, which we should be able to certify. In that part, we therefore fulfil the agreement for a longer period (after the education itself has been completed). Since the certificate or information about completed training must be linked to you personally, we also process your social security number.

#### How long do we store your personal data?

We have a special policy for storage times concerning, for example the eeducation program (Real Winner/Ren Vinnare), the Basic course in anti-doping, the Doping control officer training. You can view the policy <u>here</u>. Otherwise, we save your personal data for 12 months.

#### With whom do we share your personal data?

The information, typically information about completed education, may be shared with the Swedish Sports Confederation (Riksidrottsförbundet, RF) and its members, with partners such as other anti-doping organizations or with sports organizations such as the Swedish Olympic Committee. Information about participants is also shared with other participants at the education session.



In some cases, our work is carried out by a contractor of ours who then gets access to your personal data. In these cases, we follow current regulations, which means that the recipient may not handle the personal data in any other way than according to our written instructions and in accordance with what is described in this policy.

#### The purpose of protecting our rights and interests

#### Why we process your personal data for this purpose?

In order for us to be able to protect ourselves and our interests, for example safeguarding our interests in a possible dispute or the like or to be able to prevent or investigate possible violations of the law, we might need to process your personal data. For this purpose, the data can be stored for a period of up to 10 years, but no longer than necessary. We may share them with courts or authorities

Our legal basis for processing personal data is our legitimate interests in establishing, exercising, investigating or defending the legal claim.

# Where we store your data - transfer of personal data within the framework of anti-doping work

#### Where we store your data

Normally we store and process your personal data within the EU/EEA. In exceptional cases, however, your personal data may be transferred to, and processed in, countries outside the EU/EEA through our suppliers or assistants. In the cases where we do so, we will ensure that the transfer complies with an adequate level of protection according to the GDPR such as an adequacy decision, EU Commission standard contract clauses or binding corporate regulations supplemented by the technical and administrative protection measures deemed necessary to ensure an essentially equivalent level of protection for the data that within the EU/EEA.

#### Transfer within the framework of anti-doping work

In order for us to be able to carry out anti-doping work in accordance with the Code, it requires cooperation with other anti-doping organizations, sports organizations and other actors who are connected to some of these. This means that we may share your personal data with one or more of these different organizations.



WADA's database "ADAMS" is located in Canada, which, according to the decision of the Commission, is a country that ensures an adequate level of protection for transmitted data. Transfer of personal data to WADA via ADAMS thus fulfils the Data Protection Regulation's requirements for a third country transfer (Article 45). Personal data may be transferred to third countries within the framework of sports' anti-doping work with the support of the provisions of the data protection regulation. Recital 112 of the data protection regulation states that international exchanges of data to reduce and/or eliminate doping in sports as an example of an important public interest. Transfer of personal data to third countries can therefore take place in anti-doping work even if there is no decision from the Commission on an adequate level of protection (Article 45) or suitable protective measures (Article 46) in the data protection regulation.

In some cases, your personal data may be transferred to organizations in the so-called third countries (countries outside the European Economic Area, EEA). It may, for example, be relevant when/if you train or compete in a third country. WADA and your International Sports Federation also have access to your personal information through ADAMS and other communication channels (encrypted email, telephone, etc.) and if you participate in the Olympic Games and other major competitive events, the competition organizer will have access to your personal information through ADAMS.

Before we share your personal data, we always ensure that sufficient technical and organizational security measures are taken.

## Data subject rights

#### Right of access

You can contact us at any time (<u>dataskyddsombud@antidoping.se</u>) to request an extract of the personal data processing that concerns you Request the rectification of the personal data that we process about you. This enables you to have incomplete or inaccurate data we hold about you corrected.

#### Right to rectification

You can contact us at any time and request to have incorrect personal data corrected or to complete incomplete personal data.



## Right to be forgotten

You have the right to ask us to *erase/delete* your personal data. Even if you ask us to delete your personal data, we may sometimes need to save certain personal data, e.g. when the law or the Code requires us to do so or if the processing is required to defend or assert our legal interests. In such cases, we will block the use of your personal data for the purposes for which you wish to be forgotten.

## Right to limitation of processing

You have the right to request that the processing of your personal data be restricted, for example while waiting for incorrect information to be checked and possibly corrected. Note that a restriction or deletion of your personal data may mean that we are unable to fulfil our obligations towards you.

We must also inform you when the restriction on the processing of your personal data ends.

## Right to object

You can object at any time to our processing of your personal data, for example for direct marketing. That includes any profiling of you that is done for such purposes. If you object to your personal data being processed for direct marketing, we must immediately stop that processing. Note that if you are the one contacting us to get more information about our services, it is not an example of direct marketing.

## Right to data portability

You have the right to obtain your personal data in a machine-readable format and transfer them to another personal data controller, so-called data portability. This only applies to personal data that you yourself have given us, which is processed automatically by us and which we process in order to be able to fulfil the agreement with you or because you have given your consent.

## Contact, questions, complaints etc.

If you have questions, comments or complaints regarding our processing of your personal data, you are welcome to contact <u>dataskyddsombud@antidoping.se</u>. We are happy to help you. If we should not succeed in finding a solution together, you can turn to the Swedish Data Protection Authority, which is the supervisory authority for the processing of personal data.



The Swedish Data Protection Authority (Integritetsskyddsmyndigheten) can be reached at:

Integritetsskyddsmyndigheten Box 8114 104 20 Stockholm E-post: <u>imy@imy.se</u> Växel: <u>08-657 61 00</u> https://www.imy.se/

You will find WADA's contact information here.

## **Changes to our Privacy Policy**

The privacy policy is updated continuously. Ongoing minor changes to our Privacy Policy are communicated through the website. Substantial changes in how your data is handled take place by e-mail (if we have access to your e-mail address), SMS or letter.