



Personal Information Notice

In accordance with the International Standard of Protection of Privacy and Personal Information (ISPPPI) the Bermuda Sport Anti-Doping Authority (BSADA) notifies all Participants and Persons whose Personal Information (PI) may be processed by BSADA of the following.

- 1) **Privacy Contact.** Duncan Barclay is the designated Privacy Officer for BSADA and can be contacted at results@bsada.org should you have any question relating to the Processing of Personal Information.
- 2) **Types of Personal Information** that may be processed include;
 - Data relating to a Participants or other Person's identity (name, nationality, date of birth, gender, sport(s) and discipline(s) they compete in, organizations and/or sports federations to which they belong, an indication of whether they compete at an international or national level, and whether they are considered to be a National or International-Level Athlete in accordance with the Rules of the relevant International Federation and/or National Anti-Doping Organization).
 - Data relating to an Athletes whereabouts (e.g., training, competitions, travel, periods spent at home, on vacation, or other regular or exceptional activities), including, each time an Athlete elects to use the "auto-location" reporting button on the ADAMS app, information about an Athletes mobile device's location.
 - Data relating to Test Distribution Planning.
 - Data relating to TUE.
 - Data relating to Doping Control (test distribution planning, In and Out of Competition Sample collection and handling, laboratory analysis, Results Management, hearings and appeals including sanction related information).
 - Data relating to the Athlete Biological Passport; and
 - Data relating to Intelligence gathering specific to a potential Anti-Doping Rule Violation.
- 3) **Purpose.** BSADA, as the designated National Anti-Doping Organization (NADO) for Bermuda is mandated to conduct a coordinated and effective Anti-Doping program and to fulfil its responsibilities arising under the World Anti-Doping Code ("Code") and the current Anti-Doping in Sport Act.

Your PI will be used for the detection, deterrence, and prevention of doping in sport, in accordance with the World Anti-Doping Code (Code), the International Standards (IS), and the Anti-Doping rules of Anti-Doping Organizations (ADOs) with authority to test you. This includes:

- Test planning and management.
- Sample analysis.
- The Athlete Biological Passport (ABP), which collates biological markers from multiple samples and multiple testing authorities (TAs).

- Results management, in the event of an adverse or atypical finding based on your sample(s) or the ABP. If you have a therapeutic use exemption, it could be relevant to results management; and
- Intelligence-gathering and investigations.

Your sample as well as data derived from your PI may also be used for secondary purposes such as Anti-Doping research or to improve and verify the quality of Anti-Doping detection methods if the conditions of Code Article 6.3 are met, namely: measures are adopted to ensure your PI and sample cannot be linked to each other and cannot be traced back to you; the research or quality improvement study complies with applicable law and internationally recognized ethical research principles; and, for research projects, you provided your separate – and optional – consent for the use of your sample in research.

- 4) **Types of Recipients.** Personal Information Processed by BSADA may be shown to other Anti-Doping Organizations (ADOs), the World Anti-Doping Organization (WADA) or Third Parties and Third-Party agents who may be located in other countries where the participant may compete, train or travel. These include:
- The ADO acting as TA and/or Results Management Authority (RMA) - i.e., your national ADO, inter-national federation, or the organizer of an event you participated in - and their sample collection authority and/or doping control coordinator, as identified on the DCF, or their other delegated third parties. ADOs must handle your PI in accordance with the International Standard for the Protection of Privacy and Personal Information (ISPPPI). Consult your TA for more details about its processing of your PI.
 - Laboratories and Athlete Passport Management Units that are subject to the International Standard for Laboratories. They only have access to coded data (based on sample codes or passport IDs) that does not disclose your identity.
 - WADA and its delegated third parties. WADA operates and manages ADAMS, a platform hosted in Canada based on the rules of the Code and IS, onto which your PI will be uploaded by the TA. ADAMS will be used by the recipients described above to share your PI as necessary for their Anti-Doping activities. For details about ADAMS, associated mobile apps like DCO Central, and how WADA will process your PI, review the ADAMS Privacy Policy (<https://adams-help.wada-ama.org/hc/en-us/articles/360012071820-ADAMS-Privacy-Policy>).
 - If you receive a sanction for an Anti-Doping rule violation (ADRV), the Code requires that your RMA make this information public.
- 5) **Public Disclosure.** If an Athlete or other Person is found to have committed an Anti-Doping Rule Violation (ADRV) and receives a sanction as a result, the respective sanctions, Athlete or other Person's name, sport, Prohibited Substance or Method, and/or tribunal decision, may be publicly disclosed by BSADA and other relevant ADOs, in accordance with the Code.
- 6) **Rights.** Persons whose Personal Information has been processed by BSADA have 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 their data. Persons may also have a right to lodge a complaint with a national regulator responsible for data protection in Bermuda. Please see point seven (7) for more information.

Because Anti-Doping is a mandatory feature of organized sport, it may still be necessary for WADA and other ADOs and organizations to continue to process your PI to fulfill obligations

under the Code, the IS and /or national Anti-Doping laws, despite your objection to such processing or withdraw 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, WAD 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 other Anti-Doping rules applicable to you; 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.

- 7) **Complaints.** Any questions or complaints relating to the processing of data and Personal Information should be directed to the BSADA privacy officer listed in point one (1) in the first instance, outlining the complaint and what remediation you are seeking. If BSADA can't take action the remediation or is unwilling do so, the complainant should contact the Privacy Commissioner of Bermuda or WADA (privacy@wada-ama.org).
- 8) **Retention.** Data collected by BSADA will be retained in accordance with the criteria set out in Annex A of the ISPPPI.
- 9) **Consequences.** Participants or other Persons have the right to object to the processing of their data, however it still may be necessary for BSADA to continue to process (including retain) certain data specific to the individual to fulfil obligations and responsibilities arising under the Code, International Standards, and/or national Anti-Doping laws, notwithstanding the athletes 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 an athlete, WADA and/or another ADO.

Refusing or objecting to participate in Doping Control or the processing, including disclosure, of data may prevent a Participant, BSADA, WADA or other ADOs from complying with the Code and relevant WADA International Standards, which could have consequences for the Participant, such as an Anti-Doping Rule Violation under the Code or the inability to participate in sporting events and invalidate Competition results.
- 10) **Legal Basis.** The legal basis for BSADA to process Personal Information is through the Anti-Doping in Sport Act and the Bermuda PIPA legislation.