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| Policy Title | INTERNATIONAL GOLF FEDERATION’S (IGF) ANTI-DOPING DATA PROTECTION POLICY | | |
| Lead Functional area | Anti-Doping | | |
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INTRODUCTION

The International Golf Federation (hereinafter referred to as the "IGF") is committed to protecting the privacy and personal information of athletes and other individuals involved in anti-doping activities.

This Data Protection Internal Policy (the "**Policy**") is issued by IGF in accordance with the International Standard for the Protection of Privacy and Personal Information ("**ISPPPI**") as set forth by the World Anti-Doping Agency ("**WADA**"). This Policy outlines the IGF's main obligations and commitments towards the protection of personal data, solely relating to anti-doping activities, including the collection, processing, and disclosure of personal information in connection with anti-doping activities. This Policy governs privacy and data protection concerns related to the IGF's anti-doping program, exclusively. The IGF also maintains a **Privacy Policy** to govern data protection and privacy in other aspects of the organization. In the event of conflict or inconsistency between this policy and any other rule or policy, in connection with an anti-doping matter, the terms and conditions of this Policy shall apply.

SCOPE

This Policy applies to all personal information that the IGF collects, processes, and discloses, solely in connection with anti-doping activities. This includes personal information related to athletes, athlete support personnel, and other individuals who are subject to the IGF's Anti-Doping Rules and other applicable regulations.

This Policy applies to all IGF's employees, providers, consultants, and other individuals who handle personal data related to anti-doping activities in the context of the IGF's anti-doping programme.

PURPOSE

The purpose of this Policy is to ensure that the IGF complies with the ISPPPI and all other applicable data protection laws and regulations, including the General Data Protection Regulation ("**GDPR**"), the New Federal Act on Data Protection ("**nFADP**") and other relevant regulations. The IGF recognizes the importance of protecting personal data and is committed to ensuring that all personal data is collected, processed, and disclosed in accordance with the principles of data protection.

PRINCIPLES

The following principles guide the IGF's collection, processing, and disclosure of personal data in relation to anti-doping activities:

1. Lawfulness, Fairness, and Transparency: the IGF shall ensure that personal data is collected, processed, and disclosed in a lawful, fair, and transparent manner.
2. Purpose Limitation: personal data shall only be collected, processed, and disclosed for specific and legitimate purposes related to anti-doping activities authorized under the World Anti-Doping Code and International Standard,

provided such processing activities do not conflict with applicable privacy and data protection laws.

3. Necessity, Proportionality: the IGF shall ensure that personal data is processed only where necessary and proportionate.
4. Data Minimization: the IGF shall collect, process, and disclose only the minimum amount of personal data necessary for the purposes of anti-doping activities.
5. Accuracy: the IGF shall take reasonable steps to ensure that personal data is accurate and up to date.
6. Storage Limitation: the IGF shall retain personal data for no longer than necessary for the purposes of anti-doping activities.
7. Integrity and Confidentiality: the IGF shall ensure that personal data is kept secure and confidential.
8. Accountability: the IGF shall take responsibility for ensuring compliance with this Policy and all applicable data protection laws and regulations.

COLLECTION AND PROCESSING OF PERSONAL DATA

The IGF shall only collect personal data under this Policy for specific and legitimate purposes related to anti-doping activities. Personal data shall be collected directly from the individual concerned, or from authorized sources where so allowed. The IGF shall inform data subjects amongst other aspects of the purpose and legal basis for the processing of their personal data, the categories of personal data being processed, the recipients or categories of recipients of the personal data, and the data subject's rights under data protection law and the ISPPPI. The IGF must communicate the processing purposes and other information to data subjects in a clear and easily understandable manner, using plain language.

The IGF shall only process personal data for the purposes for which it was collected. The IGF shall ensure that personal data is accurate and up-to-date and shall take reasonable steps to rectify any inaccuracies.

DISCLOSURE OF PERSONAL DATA

The IGF may disclose personal data for the purposes of anti-doping activities to WADA, National Anti-Doping Organizations (NADOs), Delegated Third Parties and service providers such as the International Testing Agency, other International Federations, Major Events Organizers, and other authorized third parties as further described in the ISPPPI. The IGF shall ensure that any such disclosures are made in accordance with applicable data protection laws and regulations, and that appropriate safeguards are in place to protect personal data.

The IGF shall ensure that any third-party recipients of personal data are bound by appropriate contractual or regulatory obligations to maintain the security and confidentiality of the data.

STORAGE AND RETENTION OF PERSONAL DATA

The IGF shall ensure that personal data is kept secure and confidential, and that appropriate technical and organizational measures are in place to prevent unauthorized access, use, or disclosure. In particular, the IGF will take appropriate measures to ensure that personal data is processed securely and confidentially, including:

- implementing technical and organisational measures to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage;
- limiting access to personal data to authorised personnel with a legitimate need-to-know;
- implementing procedures to ensure the confidentiality and integrity of personal data, including secure transmission and storage; and
- ensuring that third-party processors and service providers comply with ISPPPI, nFADP and GDPR requirements.

Access to personal data in connection with anti-doping activities shall be limited to authorized individuals who require access to perform their duties and responsibilities within the scope of their employment or contractual obligations with the IGF.

Personal data shall be retained for no longer than necessary for the purposes of anti-doping activities and shall be securely disposed of when no longer required. The IGF will retain personal data for no longer than necessary to fulfil the anti-doping purposes, in accordance with the ISPPPI.

RIGHTS OF DATA SUBJECT

Data subjects have the right to access, rectify, and erase their personal data, as well as the right to restrict or object to its processing and the right to data portability, subject to certain limitations under data protection law. The IGF will provide individuals with access to their personal information upon request and in accordance with the procedures outlined in the ISPPPI and will take reasonable steps to correct or delete any inaccurate or incomplete information.

TRAINING AND EDUCATION

The IGF will provide training and education, within its financial means, to all IGF employees and individuals involved in anti-doping activities on the IGF's data protection policies and procedures, as well as on the requirements of the ISPPPI.

POINT OF CONTACT FOR ISPPPI COMPLIANCE

In accordance with the ISPPPI, the IGF has appointed a Project Manager as the person responsible for compliance with ISPPPI and other applicable privacy and data protection laws, as well as for the purpose of handling complaints and enabling the data subjects to exercise the data subject rights available under the ISPPPI and other applicable data protection laws.

PERSONAL DATA BREACHES

The IGF shall have a procedure in place for responding to personal data breaches, which shall include, without limitation, steps to identify and assess the risk to the affected individuals, take appropriate corrective action, minimize the impact of the breach and ensure that affected individuals are notified in a timely and appropriate manner, as required by applicable data protection laws, including the ISPPPI and GDPR.

The IGF shall also have a procedure in place for documenting and recording any such data breaches and provide regular updates to the relevant authorities. The IGF shall additionally ensure that the rights of data subjects are respected, and that the data is processed in a lawful and secure manner.

COMPLIANCE AND MONITORING

The IGF will regularly review and monitor its data protection policies and procedures to ensure compliance with the ISPPPI and applicable laws and regulations. Any breaches of this Policy or the ISPPPI will be promptly investigated, and appropriate corrective actions will be taken.