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 inform Athletes specifically about Processing of their Personal Information through the Anti-Doping Administration and Management System “ADAMS”.

The definitions of the terms capitalised and in italics can be found in the last section of this notice and have been extracted from WADA’s International Standard for the Protection of Privacy and Personal Information (ISPPPI).

Processing Data in ADAMS
You are being asked to read the IGF’s 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. For more information on ADAMS, you may consult the WADA website at www.wada-ama.org.

Purpose of ADAMS
ADAMS enables Anti-Doping Organizations (“ADOs”), such as the IGF, and WADA to conduct harmonised, coordinated and effective anti-doping programs and to fulfil their respective responsibilities arising under the World Anti-Doping Code (“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 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 Organization);

- 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.

Responsibility
Your Custodian Organization, which is the Anti-Doping Organization that has primary responsibility for entering and managing your profile in ADAMS, has created your unique ADAMS profile. You can identify your Custodian Organization 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 Code. Your Custodian Organization 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 Organization 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 onto 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 Organization immediately and a new password will be assigned to you.

Legal basis
Your Custodian Organization 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 Anti-Doping Organization 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 Organization may be shown to other ADOs using ADAMS to ensure that only a single athlete profile for you is created.

The Custodian Organization and WADA, where appropriate, may enable other ADOs and service providers to access certain of your information appearing in ADAMS to enable them to administer anti-doping programs. In particular, the Custodian Organization shall grant WADA the authorization to disclose your whereabouts information to other Anti-Doping Organizations so that such Anti-Doping Organizations are able to fulfil their obligations pursuant to the 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 organizations such as the International Olympic Committee and International Paralympic Committee, international federations and national anti-doping organizations. These ADOs are granted access on a need-to-know basis in accordance with the Code. By viewing the “Security” tab on your ADAMS profile, you can learn which organizations have access to your data.

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

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 Organization and/or WADA (privacy@wada-ama.org), as appropriate.

Security
ADAMS is hosted in data centers in Canada. Strong technological, organizational 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. For instance, if your Custodian Organization 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 Code. Supporting medical and other TUE-related information is only retained for a period of 18 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 Organization and WADA to continue to process (including retain) certain of your data to fulfil obligations and responsibilities arising under the 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 Organization, WADA or other ADOs from complying with the Code and relevant WADA International Standards, which could have consequences for you, such as an anti-doping violation under the Code or the inability to participate in sporting events.
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 (the Code) and/or the relevant WADA International Standards.

Anti-Doping Activities: Activities specified by the Code and the International Standards to be carried out by Anti-Doping Organizations, and their Third-Party Agents, for the purpose of establishing whether anti-doping rule violations took place, including collecting whereabouts information; conducting Testing; performing results management; determining whether an Athlete’s Use of a Prohibited Substance or Prohibited Method is strictly limited to legitimate and documented therapeutic purposes; educating Participants on their rights and responsibilities; conducting investigations into anti-doping rule violations; and initiating legal proceedings against those who are alleged to have committed such a violation.

Anti-Doping Organization: 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 Organizations that conduct Testing at their Events, WADA, International Federations, and National Anti-Doping Organizations.

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 Organization). An Anti-Doping Organization 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 Personnel: 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 Organization’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, 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 natural or legal Person, public authority, agency or body, including without limitation subcontractors and their subcontractors, that Processes Personal Information for or on behalf of an Anti-Doping Organization.