Anti-Doping Privacy Notice

INTRODUCTION

The <u>Federation of International Bandy</u> (FIB, we, us, our) is an autonomous non-profit organization and the official international body for the sport of bandy, established by National Bandy Associations and recognized by the International Olympic Committee. FIB has its legal residence in Sweden.

FIB safeguards the protection of your individual rights and your personal information in accordance with the World Anti-Doping Code, the European General Information Protection Regulation (EU 2016/679) and complementing Swedish laws (SFS 2018:218 and 2022:926).

FIB is the sole information controller for the personal information we collect. This privacy notice describes how we collect, process, store, retain, and share personal information related to anti-doping activities.

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WHOSE PERSONAL INFORMATION MAY BE PROCESSED?

This privacy notice covers the processing of personal information that may take place within the framework of anti-doping activities conducted by FIB and is generally aimed at:

- Athletes under FIB's jurisdiction.
- Athlete support personnel, including any person working with, treating or assisting an athlete participating in or preparing for a competition.
- Elected or appointed officials, employees and consultants who are involved in or affected by anti-doping activities.
- Any person that enters into an agreement with FIB.
- Third party agencies acting on FIB's behalf and their employees.

WHY DO WE PROCESS PERSONAL INFORMATION?

Purpose

To perform our anti-doping activities in accordance with <u>World Anti-Doping Code</u>, FIB is required to process your personal information. We will process your personal information only when we have a legal basis to do so and for the following purposes:

- Provision of information and training/education to athletes, athlete support personnel and other persons about anti-doping and fair play.
- Managing of applications of therapeutic use exemption, request review of and appeal of such exemption.
- Planning, coordinating and administering whereabouts reports.
- Planning, coordinating and implementing doping controls.
- Collecting, processing, analyzing and sharing information relating to potential anti-doping rule violations.
- Managing cases of anti-doping rule violations, decide on, provide information about and appeal decisions in such cases.
- Fulfill contractual obligations.

Information sources

The personal information we process is often received directly from you. In accordance with <u>World Anti-Doping Code</u>, information may also be provided by a National Bandy Association, National Anti-Doping Organization, International Sport Federations, <u>World Anti-Doping Agency</u> (WADA), WADA's accredited or recognized Anti-Doping Laboratories, other organizations or individuals, or received from available open sources like Internet. Where FIB receive personal information from a third party without your knowledge, we will inform you as soon as possible. However, if such a message would undermine the integrity of ongoing or planned anti-doping operations it may be delayed.

Type of personal information

The information we process includes type of contact, name, date of birth, nationality, contact details and passed anti-doping training/education, but also - where applicable - sensitive personal information about health, whereabouts information, doping controls, genetic and/or biometric information to uniquely identify you, potential or established anti-doping rule violations and sanctions.

FIB only collects the minimum amount of information with a cognizance of the necessity and proportionality of any processing activity.

Legal basis

Our legal basis for the processing of your personal information is based on your consent, an agreement or a public interest.

HOW DO WE STORE AND PROTECT PERSONAL INFORMATION?

Your personal information is protected by both technical and organizational measures. This means, among other things, that only a limited number of qualified officials who need access to your personal information to carry out their duties under the World Anti-Doping Code will have access to your information. In line with the Code, such persons will also have signed a confidentiality agreement.

FIB uses a database, ADAMS, for the recording of all personal information related to doping controls, therapeutic use exemption, anti-doping rule violations and whereabouts information for testing pool 1 and 2. ADAMS is the official database to be used by all Anti-Doping Organization under the World Anti-Doping Code. ADAMS is protected by a two-factor authentication, it has firewalls to prevent

unwanted intrusion into the system and all information are encrypted. The <u>World Anti-Doping Agency</u> (WADA) is responsible for ADAMS security.

Beside the personal information recorded in ADAMS, FIB will only process personal information that is not to be registered in ADAMS, mainly information related to our activities in the field of information/education (contact details etc.). For this purpose, Excel and Word is used. We also use encrypted mail and a robust anti-virus software, which is regularly updated along with all software. The computers and the files used are password protected and securely stored when not used. Documents including personal information, like doping control forms and therapeutic use exemption applications etc., are also securely stored. An appointed Privacy Officer monitors our compliance under the World Anti-Doping Code and applicable laws.

WITH WHOM DO WE SHARE PERSONAL INFORMATION?

To fulfill our obligations under the <u>World Anti-Doping Code</u>, FIB will sometimes share your personal information with other organizations:

Thearapeutic Use Exepmtions (TUE)

If you apply for a TUE, members of FIB's TUE Committee will have access to your health information. The doctor who signed the application may also be contacted for complementing information. If so, we will also provide you with this information. Your information will also be shared with your National Anti-Doping Organizations, the International Sport Federations you are affiliated to and World Anti-Doping Agency (WADA).

Whereabouts information

If you are part of FIB's testing pools your whereabouts information, may be shared with your National Anti-Doping Organizations, the International Sport Federations you are affiliated to, WADA and Major Event Organizers.

Doping controls

If you have been selected for testing and required to provide a urine and/or blood sample, your personal information will be shared with your National Anti-Doping Organizations, the International Sports Federations you are affiliated to, WADA and - where appropriate - Major Event Organizers.

Anti-doping rule violations

If you are investigated for a potential anti-doping violation, your personal information will be shared with your National Anti-Doping Organizations, the International Sports Federations you are affiliated to, WADA and - where appropriate - with law enforcement agencies. If you after the first instance hearing are found to have committed an anti-doping rule violation, we will share your information also with your National Bandy Federation and - where appropriate - Major Event Organizers and the Court of Arbitration for Sport (CAS). Where appropriate FIB will also publicly disclose your name, sport, the rule violated, the prohibited substances or methods involved (if any) and the consequences imposed on our website.

FIB may occasionally use a third-party agent to act on our behalf. If so, they will also get access to your personal information. They are, however, bound to handle your personal information according to our written instructions and in line with this privacy notice.

Personal information recorded in WADA's database, ADAMS, will be automatically transferred to competent organizations in accordance with this privacy notice and the <u>World Anti-Doping Code</u>. ADAMS is located in Canada, which is a country that ensures an adequate level of protection for

transmission of information to third countries. The European General Information Protection Regulation states that international exchanges of information to reduce and/or eliminate doping in sports as an example of an important public interest. If your personal information is transferred to a country outside the EU/EEA, this is done with the support of the EU's standard contractual clauses, alternatively binding company regulations supplemented by technical and administrative protection measures deemed necessary to ensure an essentially equivalent level of protection for the information as within the EU/EEA.

HOW LONG WILL WE RETAIN PERSONAL INFORMATION?

All personal information stored in ADAMS will be retained in accordance with the World Anti-Doping Agency's <u>International Standard for the Protection of Privacy and Personal Information</u> (Annex A).

Personal information related to our provision of information and training/education will be retained no longer than after the end of the calendar year your affiliation to FIB ended.

Personal information for the purpose of collecting, processing, analyzing and sharing information relating to potential anti-doping rule violations will be retained no longer than three years after the end of the calendar year in which the information was first processed. If a new piece of information about the same person's connection to doping activities is processed before the end of the deadline, the personal information that already exists about the person may continue to be processed as long as any of the information may be processed.

Where we publish personal information relating to a sanction, we will remove this information from our website at the end of the longer period of either one month or the length of any ban being served.

Where we process personal information in connection with performing an agreement, the information will be retained no longer than five years after the end of the calendar year in which the agreement ended.

Where we process personal information to meet legal requirements, we will hold the information for as long as the law requires.

YOUR RIGHTS

You have the right to **ask us for a copy** of your personal information; to **correct, delete** or **restrict** (stop any active, for example while waiting for incorrect information to be checked and possibly corrected) processing of your personal information; and to **obtain the personal information you provide to us for a contract or with your consent in a structured, machine-readable format.**

These **rights may be limited**, for example if fulfilling your request would reveal personal information about another person, where it would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping (e.g., planned tests, current intelligence or ongoing investigations). We will inform you of relevant exemptions we rely upon when responding to any request you make.

If you want to exercise any of your rights above, you are welcome to contact FIB's Privacy Officer at privacy@worldbandy.com.

UPDATES OF THIS PRIVACY NOTICE

FIB's privacy notice is updated continuously. Minor changes of it will be communicated through our website. Substantial changes in how your personal information is processed will be announced by email, SMS or regular mail (if we have access to this information).

CONTACT INFORMATION

If you have questions, comments or concerns regarding our processing of your personal information, you are welcome to contact our Privacy Officer at privacy@worldbandy.com.

If your concerns are related to ADAMS, we refer to the World Anti-Doping Agency (WADA) and their <u>ADAMS Help Center</u>.

For legal concerns about privacy, we refer to the <u>Swedish Authority for Privacy Protection</u>.