

Policy Title	Policy for Privacy and Protection of Personal Information
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Introduction and Scope:

This policy provides information about how Athletes doping control-related data will be used and processed to assist in implementing an effective Anti-Doping program.

This policy follows the International Standards on the Protection of Privacy and Personal Information (ISPPPI) available at the WADA website: <https://www.wada-ama.org>.

1. Categories of Personal Information

Athlete's Personal Information for anti-doping purposes includes, but is not limited to, information relating to:

- Athlete's identity (name, nationality, date of birth, gender, event, level of competition, organizations who have jurisdiction over the Athlete, names and details of other persons, such as medical personnel, working with, treating or assisting Athletes;
- Whereabouts Filings;
- Therapeutic Use Exemptions (TUEs);
- Doping Controls (including Test Distribution Planning, Sample collection and handling, anti-doping test results, Laboratory analysis, results management, hearings, sanctions and appeals);
- Medical or biological information obtained from anti-doping activities, including information derived from analyzing samples or specimens.

2. Collecting Entity

Personal information collected by UAE NADA and/or any other organization or body to which UAE NADA has delegated authority under the UAE Anti-Doping Rules or otherwise has competent authority to conduct testing on athletes. Encrypted / password-protected databases.

3. Purpose of Processing Personal Information

UAE NADA and its third-party agents shall only process Personal Information where necessary and appropriate to conduct their anti-doping activities under the UAE Anti-Doping Rules and WADA International Standards or where otherwise required by applicable law, regulation or compulsory legal process and where such processing does not conflict with applicable privacy and data protection laws. This includes, but is not limited to, processing Personal Information:

- To determine eligibility for a TUE;
- To conduct testing, including target testing, and to record the results from such testing;
- to conduct investigations to determine breaches of the Anti-Doping Rules;
- To carry out results management under the UAE Anti-Doping Rules, including associated disciplinary hearings, appeals and adjudications, and publish outcomes.

4. Disclosure of Information

UAE NADA may disclose personal information to third-party agents, including authorized service providers, in connection with fulfilling their anti-doping activities under the UAE Anti-Doping Rules.

Personal information may be made available to authorized Anti-Doping Organizations – for instance, designated National Anti-Doping Organisations of the Athlete’s home or residence country, national sporting federations, major games organizers and WADA – under the WADA Code and processed following the anti-doping provisions of the WADA Code to allow those authorized Anti-Doping Organisations to fulfil their obligations and responsibilities under the WADA Code.

Personal information shall not be disclosed to third parties other than as set out above, except where such disclosures:

- a) Are required by law;
- b) Take place with Athlete’s informed, express and written consent; or
- c) Are necessary to assist law enforcement or governmental authorities in the detection, investigation or prosecution of a criminal offence or breach of the WAD Code, provided that the Personal Information is reasonably relevant to the offence or violation in question and cannot otherwise be obtained by the authorities.

As further specified in the UAE Anti-Doping Rules, UAE NADA may publicly disclose personal information in certain limited situations. (such as disclosure of test results and legal panel decisions 14.3).

5. International Transfers

UAE NADA may make Personal information available to third persons or parties, including authorized service providers, WADA and Anti-Doping Organisations outside the UAE.

Athlete’s personal information for anti-doping purposes will be uploaded in ADAMS, a web-based database management system hosted in data centres located in Canada and maintained by WADA on behalf of Anti -Doping Organisations using ADAMS. Strong technological, organizational and other security measures have been applied to maintain the security of the data it contains.

6. Rights concerning Personal Information

6.1 Right of Access to Personal Information:

Athletes have the right to seek information from UAE NADA about their personal data (the types of information, the purpose for which it is collected and the third parties or categories of third parties to which it is transferred) to obtain confirmation of whether or not their personal information is being processed and to receive a copy of the relevant personal information in a readily intelligible format within a reasonable timeframe unless to do so in a particular case conflicts with UAE NADA’s ability to plan or conduct testing under the UAE Anti-Doping Rules (including target testing) or to investigate and establish anti-doping rule violations.

UAE NADA may not be required to respond to requests seeking access to personal information if the requests are excessive in scope or frequency or impose a disproportionate burden on UAE NADA in terms of cost or effort, given the nature of the personal information in question. Suppose UAE NADA refuses to allow an athlete access to personal information. In that case, it shall inform this Athlete and explain in writing the grounds for refusing the request as soon as practicable.

6.2 Right to amend Personal Information

Personal information processed by UAE NADA shall be accurate, complete and kept up to date. Where UAE NADA affirmatively knows that the personal information it is processing is inaccurate or incomplete, UAE NADA shall, as appropriate, rectify, amend, complete, update or delete the relevant Personal Information as soon as possible.

Where appropriate, if the personal information in question has been disclosed to a third party that is known or believed to continue to process the personal information, the third party shall be informed of the change as soon as possible.

Right to object to the processing of Personal Information.

Athletes have the right to object to the processing of their Personal Information. However, in such event, it may still be necessary for UAE NADA and/or third parties to continue to process (including retain) certain of their Personal Information to fulfil obligations and responsibilities arising under the UAE Anti-Doping Rules or applicable laws.

Athlete's objection to disclosing their personal information or the processing of their Personal Information will be construed as a refusal to participate in the anti-doping procedures mandated by the UAE Anti-Doping Rules. This could exclude athletes from further participation in sports and may result in disciplinary or other sanctions being imposed upon them, such as ineligibility from competitions in which they are scheduled to participate or invalidating results from prior competitions.

Right to initiate a complaint.

Athletes are entitled to initiate a complaint with a reasonable good faith belief that UAE NADA is not complying with the International Standards or applicable law. The complaint shall be made respectively to UAE NADA:

By courier: UAE National Anti-Doping Agency
3rd Floor – DIBC Building, Al Mamzar
P.O. Box 94030
Dubai - UAE

By email: info@uaenada.ae

If a complaint is not satisfactorily resolved, athletes may notify WADA, which will determine whether UAE NADA is adhering to International Standards. Where the decision is that the International Standards are not being adhered to, UAE NADA will take the necessary steps to rectify the position.

For more information on ADAMS and how it operates, athletes are advised to consult the WADA website at:
www.wada-ama.org

7. Retention

UAE NADA shall ensure that personal information is only retained for as long as is necessary to fulfil its obligations under the Anti-Doping Rules or where otherwise required by applicable law, regulation or compulsory legal process. UAE NADA will respect the retention times for different types of personal information as may be determined by WADA from time to time unless such retention times are in breach of applicable law.



Once Personal Information no longer serves the above purposes, it will be deleted, destroyed or permanently anonymized.

8. Security Measures

UAE NADA shall at all times protect Athlete's personal information by applying all necessary security safeguards, including physical, organizational, technical, environmental and other measures to prevent the loss, theft or unauthorized access, destruction, use, modification or disclosure (including disclosure made via electronic network) of the personal information.

For any further information, please get in touch with the UAE NADA Office at: info@uaenada.ae

More on the currently applicable retention period in Annex A, ISPPPI:

https://www.wada-ama.org/sites/default/files/2022-01/international_standard_ispppi_-_november_2021_0.pdf

References:

- *Protection of Privacy and Personal Information (ISPPPI).*

Approved by:

UAE National Anti-Doping Agency's Board Members on 1 July, 2023