(IsU) Anti-Doping

ISU DATA PRIVACY CONTROL PROCESS

- 1. The person designated per art. 4.5 ISPPI is the ISU Anti-Doping Director (antidoping@isu.ch).
- 2. The ISU Anti-Doping Director is responsible for a safe ISU access to ADAMS and all protected information forwarded by ISU Members and NADOs.
- 3. With respect to Adverse Analytical Findings, the ISU Anti-Doping Director is only allowed to share respective information within the ISU with the members of the ISU Medical Commission, the ISU President, the ISU Director General, the ISU Anti-Doping Department and the ISU Legal Advisors.
- 4. In special cases, as for example in the context of the McLaren Report, the ISU shall set up a Task Force and name its members. Only these members have the right to access to the respective data.
- 5. All persons involved as per 1 4 above are strictly bound to confidentiality. The provision of any kind of information to any other person is a prerogative of the ISU President and ISU Director General.
- 6. The ISU Anti-Doping Director involves the ISU Legal Advisors in all contracts to be set up and monitored with Third-Party Agents. In case of doubts about compliance of Third Parties with such contracts the ISU Legal Advisors are consulted for safeguarding compliance with the ISPPII and the applicable Swiss law.
- 7. The ISU electronic network and data storage system is run to a state-of-the-art technical standard and updated on a regular basis by the ISU IT Service Providers. Its security system is regularly updated to prevent against data theft, manipulation and any kind of unauthorized access, destruction, use, modification or disclosure of Personal Information and to pay due regard to the particular sensitivity of Personal Data.
- 8. The ISU Anti-Doping Director shall assure that access to Personal Information to the personnel of the ISU will be given on a need-to-know basis only and where consistent with assigned roles and responsibilities. Personal Information is processed in an anonymous manner, unless required to be disclosed for Results Management purposes.
- 9. Contracts with Third-Party-Agents extend the above system to these agents and bind them strictly to the same protection system. This is safeguarded through the involvement of the ISU Legal Advisors. Only such Third-Party-Agents may be selected who technically and ethically guarantee for a respective high standard of compliance with the ISPPPI.
- 10. In case of Security Breaches, the ISU Anti-Doping Director shall be immediately informed by the ISU IT Service Providers and will inform the affected person(s) immediately on the nature of the breach, the possible negative consequences for the person(s) concerned and the measures taken or to be taken by the ISU.
- 11. The ISU Internal Control System (which is a mandatory requirement under Swiss Law and which is annually reviewed by the external ISU auditors) includes a provision relating to the security of the ISU Information Systems. An IT Audit, including data protection, is done periodically by the external ISU Auditing Company.