

NOTICE TO ATHLETES ABOUT PROCESSING OF PERSONAL INFORMATION IN ADAMS

Processing Data in ADAMS

You are being asked to read the following Information Notice to ensure that you are aware that some personal information related to you will be used and processed by the International Golf Federation through the anti-doping administration and management system (“ADAMS”), a web-based data management system developed and administered by the World Anti-Doping Agency (“WADA”) in its role as central clearinghouse for anti-doping information. 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, consult the WADA website at www.wada-ama.org.

Purpose of ADAMS

ADAMS enables Organizations, such as the International Golf Federation and WADA to conduct harmonized, 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, and sanctions-related information relevant to individual athletes.

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 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, organizations 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 Authority 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.

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. They should only be 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; 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.

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.

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 and/or correct any inaccurate data and remedies with respect to any unlawful processing of your data.

Security

ADAMS is securely maintained in Switzerland and 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.

Data retention

It may be necessary to retain your data in ADAMS for a minimum period of ten years. 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 minimum period of ten years. The period of ten years represents the time period during which an action may be commenced for an anti-doping violation under the Code. If you are part of the Athlete Biological Passport program, the ten-year retention period also applies to your whereabouts information. Otherwise, whereabouts information is only retained for a period of 18 months. For more information, please consult the Annex to WADA’s International Standard for the Protection of Privacy and Personal Information.

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.

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, in which case such objection could constitute an anti-doping violation.