

ADAMS Privacy Policy - Prior version

February 7, 2024

We've made some updates!

Last updated: March 10, 2020

The Anti-Doping Administration and Management System (**ADAMS**) is a centralized, free platform operated and managed by the World Anti-Doping Agency (**WADA** or **we, our**). ADAMS supports clean sport by simplifying the daily activities of all stakeholders and athletes involved in anti-doping programs. It is built to be secure, to ensure anti-doping programs are coordinated and efficient, and to harmonize anti-doping practices around the world. ADAMS and its features are based on the rules of the [World Anti-Doping Code](#) (**Code**) and [International Standards](#).

When we talk about ADAMS, we also mean any related mobile applications, like Athlete Central or DCO Central, that are integrated with ADAMS.

This updated ADAMS Privacy Policy focusses on WADA's specific use of ADAMS and how we handle your personal information. For a general description of ADAMS and how it may be used by anti-doping organizations and other entities, see the [ADAMS Privacy and Security FAQs](#). If your access to ADAMS is as a result of your affiliation with an anti-doping organization or other entity, your use of ADAMS should comply with their policies and procedures.

Under the [International Standard for the Protection of Privacy and Personal Information](#) (ISPPPI), each organization that processes your personal information for anti-doping purposes is responsible for this processing and is required to explain to you how and when the information will be uploaded to and shared via ADAMS. Contact your national anti-doping organization or international federation to learn more.

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INFORMATION FOR ATHLETES

INFORMATION MAINTAINED IN ADAMS

The types of information collected through doping controls and other anti-doping processes that are then uploaded to ADAMS are based on the anti-doping rules established in the Code and the International Standards.

The anti-doping organization (**ADO**) that creates your profile in ADAMS or that manages your biological passport if you have one (this is usually your national anti-doping organization or international federation) has primary responsibility for uploading and managing your information in ADAMS.

Depending on your level as an athlete, your ADO's use of ADAMS, your needs involving any therapeutic use exemptions, and whether or not you are sanctioned for an anti-doping rule violation, the types of anti-doping information maintained in ADAMS will include:

| | |
|--|---|
| Athlete Profile | <i>Data relating to your identity (for example, ADAMS ID, name, nationality, date of birth, gender, and sport and discipline you compete in).</i> |
| Whereabouts | <i>The locations where you may be located for out of competition doping controls (for example, addresses for regular activities like training, work or school and for the location(s) where you will be available for testing during a daily one-hour time slot).</i> |
| Test Planning | <i>Information regarding scheduled and completed doping controls (for example, doping control forms, type of test, sample code numbers, responses and information provided by you during a doping control session)</i> |
| Laboratory results | <i>Information related to the analysis of doping control samples (for example, measured steroid profile or blood variables, test methods, and qualification of results – e.g. as an adverse analytical finding or atypical finding).</i> |
| Therapeutic Use Exemption (TUE) | <i>If you have a medical condition and must use a prohibited substance or method, your TUE application and supporting medical information.</i> |
| Athlete Biological Passport (ABP) | <i>Information and assessments related to an athlete's biological passport (for example, Biological passport ID, consolidated blood and steroid biological marker values and ratios, associated laboratory results and expert reports).</i> |
| Results Management | <i>Information regarding anti-doping rule violations (ADRVs) (for example, ADRV details and comments, dates of any relevant provisional suspensions, whereabouts failures, sanctions and decisions).</i> |

In this Policy, we refer to the above information categories as **Doping Control Data**. To learn more about Doping Control Data, review the response to [What information is collected in ADAMS and how is it used and shared?](#) in our [ADAMS Privacy and Security FAQs](#).

If you are subject to an obligation to provide whereabouts, you likely have your own ADAMS account, in which case certain **Technical Data** related to: the device and/or browser you use to access ADAMS (including any ADAMS mobile app), such as the IP address and type of device or browser used; to your use of ADAMS, such as page requests, time spent, page speeds/resolution, and actions taken (views, edits, etc.); and to the date, time and location from which you accessed ADAMS will be automatically collected.

HOW AND WHY WE USE THIS INFORMATION

At WADA, we only use ADAMS and the personal information it contains for anti-doping purposes, as described in the Code and International Standards. Where your ADO uses data maintained in ADAMS for other purposes (for example, to monitor compliance with code of conduct, eligibility, or health and safety rules), this falls outside of WADA's control or responsibility and outside the scope of the Code and International Standards.

One of WADA's key mandates under the Code is to **monitor compliance** with the Code and International Standards by other ADOs. In order to carry out this mandate in an independent manner, WADA has access to the Doping Control Data submitted by other ADOs and organizations to ADAMS.

Key activities that require WADA to access and use your **Doping Control Data** to monitor Code compliance include:

| | |
|--|--|
| TUEs Reviewing and appealing determinations in respect of TUEs in accordance with the International Standard for Therapeutic Use Exemptions | Results Management Reviewing and appealing results management decisions in accordance with the International Standard for Results Management |
| Compliance & Standards Reviewing an ADO's testing distribution plan, risk assessment, and the doping controls it conducted as part of a compliance audit or assessment process or to verify that the conditions of a testing grant have been complied with | Independent Observer Designing and conducting independent observer programs and other types of event advisory programs at competitions and major events |
| Laboratory Accreditation Reviewing the work of anti-doping laboratories for the purpose of accreditation or approval assessments | ABP Reviewing the work of athlete passport management units (APMUs) for the purpose of approval assessments and to ensure the effectiveness of the athlete biological passport program |

RADO Program

Managing the regional anti-doping organization (RADO) program (this could include for example, monitoring and assisting with the anti-doping activities of a RADO)

Capacity-Building

Helping ADOs with their use of ADAMS or helping to build their capacity for anti-doping (for example, if requested, WADA may assist an ADO with their input of Doping Control Data into ADAMS, or review an ADO's test distribution plan).

WADA's other **key roles and obligations** under the Code that require us to process **Doping Control Data** and, in certain cases, **Technical Data** are:

- **Doping Controls:** We sometimes conduct Doping Controls on our own initiative or as requested by another ADO. When we do this, we will collect Doping Control Data directly from you through a doping control session and upload it to ADAMS.
- **Intelligence & Investigations:** WADA is empowered under the Code to initiate and conduct anti-doping investigations. All types of Doping Control Data and Technical Data described in this Policy may be used, on a case-by-case basis, to support WADA's intelligence-gathering and investigation-related activities in accordance with its internal policies to ensure that anti-doping intelligence and investigations are handled securely and confidentially.
- **Detection:** WADA is constantly working to improve existing detection methods for prohibited methods and substances. This could involve, for instance, consulting with experts from WADA's committees and working groups. Doping Control Data used for this purpose is only shared on a non-identifiable basis (for example, a biological passport associated with a biological passport ID may be shared for assessment and analysis with WADA's ABP Working Group).
- **Research & Statistics:** As part of WADA's role in the fight for doping-free sport under the World Anti-Doping Code, we aggregate certain Doping Control Data to create statistics about anti-doping (for instance, WADA publishes testing and anti-doping rule violation figures on an annual basis to promote and inform anti-doping efforts around the world). WADA also collects and publishes aggregate statistics regarding substances that are part of WADA's monitoring program to detect patterns of misuse in sport. Moreover, WADA supports and engages in scientific research dedicated to developing new and improved detection methods for prohibited substances and methods. Before Doping Control Data is used and shared with any third-party researchers for research purposes, it is first processed to ensure it cannot be traced back to a particular athlete. Any such research and third-party researchers must also comply with internationally-recognized ethical research principles.
- **Operating & Managing ADAMS:** Key activities requiring the processing of data include:
 - Enabling certain features to function (for example, notifying you of atypical activities on your account such as a log in from a new location; or allowing you to transmit whereabouts updates via SMS. If you enable location features on Athlete Central, your GPS location is used and stored for a few seconds to auto-complete whereabouts addresses based on your location);
 - Ensuring traceability and accountability of actions in ADAMS (for example, Technical Data are needed to verify the time and date whereabouts were updated);

- Ensuring the security of the platform (we maintain logs that contain Technical Data on an automated basis).
- Providing IT support and resolving IT issues (for example, we may need to access Doping Control Data to respond to an IT support request or provide an audit report for an ADO); and
- Communicating with users and responding to your requests.

SHARING OF YOUR INFORMATION

WADA and its service providers and advisors: ADAMS is operated and managed by WADA from its Montreal (Canada) office and the platform itself is hosted in Canada. Certain WADA staff located in Lausanne (Switzerland), Tokyo (Japan) or Montevideo (Uruguay) have regular access to ADAMS to fulfill their duties. Where necessary for a specific task (for example, conducting an independent observer mission for a regional event, WADA staff located in Cape Town (South Africa), may also be provided with temporary access to ADAMS. Canadian, Swiss, Japanese and Uruguayan data protection and privacy laws have been deemed to provide adequate protection by a number of regional and national data protection agencies, as well as the European Commission. WADA also uses service providers, as well as third-party software to operate and manage ADAMS, including to host and maintain the platform; to run its intrusion and detection systems; for ADAMS' SMS-based features; and to communicate with users and manage user support. Where such service providers are not based in Canada or another jurisdiction deemed to provide an adequate level of protection, we ensure such providers are subject to appropriate contractual or other safeguards.

WADA engages various experts and advisors in the course of carrying out its roles and obligations under the Code and International Standards. These include legal and financial advisors, experts engaged during anti-doping rule violation proceedings, members of WADA's Therapeutic Use Exemption Committee, or members of other WADA committees like the laboratory expert group or athlete biological passport working group. All committee members, experts and advisors are subject to statutory and/or contractual duties of confidentiality.

Other ADOs and their delegated third parties: Certain sharing rules have been automated within ADAMS to facilitate the sharing of Doping Control Data that is required under the Code and the International Standards. For example, lab results uploaded by a laboratory to ADAMS are automatically shared with the ADO that authorized the test (the testing authority) and the ADO identified as responsible for conducting any required results management related to that test (results management authority). This sharing of Doping Control Data is necessary to allow anti-doping activities to function effectively, and serves to further the important public interests of eliminating doping in sport.

To learn more about these rules, consult the response to [What information is collected in ADAMS and how is it used and shared?](#) in our [ADAMS Privacy and Security FAQs](#).

ADOs may delegate certain aspects of their anti-doping activities to a third party and authorize these third parties to access information in ADAMS on their behalf. This could include private sample collection agencies or doping control officers.

ADOs remain responsible for delegated third parties, and for ensuring these parties comply with the Code and International Standards, including the ISPPPI.

ADOs are also responsible for setting the access permissions of these third parties in ADAMS, and for informing you about the types of third parties they work with as part of their anti-doping program so that you may understand any additional locations from which your ADAMS information will be accessed.

If you have an ADAMS account, you can learn which ADOs and third parties have access to your information by going to the "Security" or "Organizations with access" tab of your profile.

Upon request, WADA may also share personal information with ADOs where necessary to allow the ADO to fulfill its obligations under the Code (for instance, an ADO may need WADA to provide it with a report containing Technical Data and Doping Control Data in order for the ADO to verify information provided by an athlete in the context of an anti-doping rule violation).

Agents and Doctors: Your ADO may enable you to share certain ADAMS information with agents and doctors you authorize to assist you with whereabouts submissions or a therapeutic use exemption application. You and your ADO are responsible for setting up the appropriate sharing permissions for these authorized individuals in ADAMS. If you have an ADAMS account, you can learn which agents and doctors have access to your information by going to the "Security" or "Organizations with access" tab of your profile.

Legal and compliance: In the event your personal 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 where required by law or compulsory legal process or to assist such authorities in the detection, investigation or prosecution of a criminal offence or breach of the Code or professional conduct rules. WADA may also disclose your information to other organizations in the context of an investigation regarding a breach of an agreement or a contravention of law; to detect, suppress or prevent fraud; or to establish, exercise or defend a legal claim.

YOUR RIGHTS

You may have certain rights under applicable laws and under the ISPPPI, subject to applicable exemptions, including rights to access, correct and/or delete your information, the right to oppose the processing of your information, and the right to lodge a complaint with your national data protection authority or to obtain other remedies with respect to unlawful processing of your information.

Because anti-doping processes are a mandatory component of organized sport, you understand that if you object to the processing of your data or withdraw your consent (as applicable), it still may be necessary for WADA and other ADOs and organizations to continue to process (including retain) certain parts of your data to fulfill obligations and responsibilities arising under the Code, the International Standards and/or national anti-doping or sport laws, notwithstanding your request. This includes processing for investigations or proceedings related to possible anti-doping rule

violations, as well as processing to establish, exercise or defend against legal claims involving you, WADA and/or an ADO.

You also understand that withdrawing your consent or objecting to the processing of your data for anti-doping purposes may trigger your non-compliance with the Code and International Standards, as well as other anti-doping rules applicable to you. This could have consequences for you, such as producing an anti-doping rule violation under the Code (e.g., under Article 2.3 – Evasion, Refusal or Failure to Submit to Sample Collection, 2.4 – Whereabouts Failure, or 2.5 – Tampering) or preventing you from participating in sporting events.

Contact us using the email or address provided under the Contact Us section below to exercise your rights. Where relevant, we will cooperate with the ADO that manages your ADAMS profile or biological passport (as applicable) in responding to your request.

SAFEGUARDS AND RETENTION

Strong technological, organizational and other security measures have been applied to ADAMS to maintain the security of the data it contains. To learn more, including how responsibility for security in ADAMS is shared with ADOs and other organizations, review the response to [How is your information protected in ADAMS?](#) in our [ADAMS Privacy and Security FAQs](#).

We restrict access to your personal information on a need-to-know basis to employees and authorized service providers or advisors who require access to fulfill their designated functions.

Before granting administrative rights to ADAMS to another ADO, a laboratory, or another third party, we require them to enter into a contract with us governing their use of ADAMS. Under the contract, these organizations commit to complying with their obligations under applicable data protection and privacy laws, as well as the Code and the International Standards (including the ISPPPI).

Doping Control Data and Technical Data will be retained by WADA both in and outside of ADAMS in accordance with the criteria and retention periods set out in [Article 10](#) and [Annex A](#) of the ISPPPI, unless it is necessary to retain it for a longer period to defend ourselves against legal claims. The retention periods described in Annex A have been automated in ADAMS so that data are automatically purged once the relevant retention period expires.

LAWFUL AND FAIR PROCESSING

WADA only processes your personal information where necessary and proportionate to its mission to lead a collaborative worldwide movement for doping free sport in accordance with this Privacy Policy and the Code and International Standards. The important public interests served by anti-doping have been recognized in a number of international and national legal instruments, like the International Convention against Doping in Sport, and include protecting athlete health and the intrinsic values and spirit of sport.

We ask you to read this Privacy Policy when you log in to ADAMS to ensure you understand how we will process your personal information. You should have been

provided with additional notices in this regard during doping control sessions and by your ADO(s). Where appropriate and in accordance with applicable law, we will consider that you have provided us with your consent to the processing described in this Policy when you accept its terms and/or the terms of the notices provided to you during doping control sessions and your ADO(s).

Where appropriate and in accordance with applicable laws, including anti-doping/sports statutes, we may rely on other legal authorities for this processing, like the need to provide you with the ADAMS features you request (such as whereabouts submission) and to improve these features; to conduct investigations, to comply with a legal obligation or compulsory legal process, or to otherwise carry out anti-doping activities and protect clean athletes in accordance with the important public interests served by these activities.

CONTACT US AND UPDATES TO THIS POLICY

If we make material changes to this Policy, we will ask you to review the terms and re-accept them prior to logging in to your ADAMS account. If you do not have an ADAMS account, the latest version of this Policy will be posted on [WADA's main website](#). In the event of any conflict between the English and French versions of this Policy, the English version shall prevail.

If you have any questions about how we handle personal information, or have any complaints, please contact us at:

E-mail: privacy@wada-ama.org

Address:

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|----------|-------------|-----------|--------|----------|
| World | Anti-Doping | Agency | (Attn: | Privacy) |
| Stock | | Exchange | | Tower |
| 800 | Place | Victoria | (Suite | 1700) |
| Montreal | | (Quebec), | | Canada |
| H4Z 1B7 | | | | |

For contact information of the ADO(s) that has principle responsibility for your information in ADAMS, access the “Security” or Organizations with access” tab in ADAMS, or, if you don’t have your own ADAMS account, contact the ADAMS team at adams@wada-ama.org.

INFORMATION FOR OTHER INDIVIDUALS

If you are not an athlete, information about you in ADAMS will be limited to very basic information that identifies you (for example, name and username); your contact details (such as an email address); your affiliation with an athlete or organization (for example, as a coach or agent to an athlete, or as an employee of an anti-doping organization (ADO) or third-party provider); and Technical Data, as described above.

Laboratory personnel, experts, and doctors providing diagnostic information in connection with therapeutic use exemptions may also be required to confirm their name and/or contact details when rendering professional opinions or performing other

actions in connection with anti-doping processes (for example, to confirm the name of the laboratory professional that produced a test report).

This information is used by WADA to open and administer ADAMS accounts, to operate and manage the platform, including ensuring its security, to ensure accountability for the opinions or results provided by laboratory staff and other professionals, and to verify the integrity of anti-doping processes (for example, through records evidencing chains of custody). This information may also be used in connection with investigations into anti-doping rule violations or related proceedings.

By using ADAMS, you accept that the information you are required to provide in order to use the platform is necessary to fulfill your functions and duties as they relate to anti-doping and the Code (for example, as a coach, ADO employee, laboratory personnel, or independent expert).

The following sections of this Privacy Policy are also applicable to you: Sharing your Information; Your Rights; Safeguards and Retention; Lawful and Fair Processing; and Contact Us and Updates to this Policy.

COOKIES

A cookie is a small piece of data that ADAMS stores on the visitor's computer or mobile device.

Strictly Necessary Cookies: We use our own cookies that are necessary for ADAMS to function and cannot be switched off in our systems. These cookies allow us to operate and manage ADAMS, such as identify your session and ensure the security of the connection. You can set your browser to block or alert you about these cookies (see "Do not track preferences" below), but some parts of ADAMS will not work as a result. These cookies are "session" or temporary cookies that are removed from your device shortly after you end your ADAMS session.

Do not track preferences: Do Not Track is a function that allows visitors not to be tracked by websites. If you enable Do not Track in your browser, we will respect your choice, however, if your browser then blocks strictly necessary cookies, some parts of ADAMS may not work properly.

Do Not Track options are available in a number of browsers including:

- [Firefox](#)
- [Internet Explorer](#)
- [Chrome](#)
- [Safari](#)