



CyADA ANTI-DOPING PRIVACY NOTICE

1. What is the purpose of this notice?

Applicable legislation obligates Athletes and other Persons to make a substantial amount of Personal Information available to Anti-Doping Organisations (“ADOs”) as part of Doping Control. This is why it is important that we provide appropriate protection for the personal information we collect while simultaneously complying with the requirements of applicable data protection legislation, thus retaining the trust of the individuals involved.

This Privacy Notice describes how the Cyprus Anti-Doping Authority (“CyADA”, “we”, “us” or “our”), as the National Anti-Doping Organisation (“NADO”) for Cyprus, collects, uses, shares and stores your personal information to fulfil its regulatory functions under applicable anti-doping laws and regulations.

This Privacy Notice also describes what rights you have in respect of your Personal Information which you can find in Section “**Your RIGHTS**” below.

Capitalised terms used in this notice are used as defined in the Appendix.

2. Does this notice apply to you?

This Privacy Notice applies to:

- Athletes
- Athlete Support Personnel
- Any other Person the above may choose to involve such as a lawyer, independent expert or relative.

3. Controller

For the purposes of the General Data Protection Regulation (GDPR) [(EU) 2016/679], in most instances CyADA will be the sole data controller for the Personal Information it collects and processes about you. In some circumstances, as defined by law and by having the appropriate legal safeguards in place, we may share responsibility with other ADOs or other organisations, or provide Doping Control services to other ADOs or other organisations. We will make it clear if we are carrying out Testing or other processing on behalf of another ADO or other organisation.

4. How we collect your information?

Information collected directly by CyADA

The information collected directly by CyADA includes data provided in a Doping Control Form and produced as a result of any urine, blood or dried blood spot sample (“Sample”) you provide, any information you provide to fulfil your whereabouts obligations and any information provided as part of a Therapeutic Use Exemption (“TUE”) application.

Should you return a positive test, or if your sample requires further analysis or investigation, then further information may be gathered from you, including any information you provide to us in defence of a charge for an Anti-Doping Rule Violation or as evidence of mitigating circumstances.

We may also collect information that you voluntarily provide to us, including (but not limited to) when you consent to the use of your data for anti-doping scientific research, when you communicate with us via email or other channels and when you respond to our communications or requests for information.

Information provided by third parties for anti-doping purposes

We actively co-operate and share information with ADOs as defined in the Code, including other NADOs i.e. those in other countries, the World Anti-Doping Agency (“WADA”), International Federations, the International Olympic Committee, the International Paralympic Committee, and other Major Event Organisations, as well as other relevant organisations, including the Cyprus National Olympic Committee, the Cyprus National Paralympic Committee, the Cyprus Sports Organisation and National Federations. We may also share information with the Cyprus Police and other law enforcement agencies, and other relevant regulators and authorities where required by law.

Whenever another organisation has a reason to believe that we need information relating to you, we may receive information from them.

Information may also be provided by a number of other third parties. For example, we may receive intelligence on anti-doping related matters from the media, from members of the public, and from competition organisers. We may also obtain information about you from third party providers who collate publicly available and demographic information, for the purpose of improving the accuracy of our data and our intelligence-led testing and enforcement.

Where you choose to involve a third party such as a lawyer, independent expert, trade union representative or relative, we may also receive information from them.

5. What information we collect and for what purposes we process it?

We always try to limit the amount of information we hold about you and only use that information where necessary. Below we describe the purposes for which we collect your information and the type of information we normally collect.

Purpose	Personal information	
Testing	ATHLETE	<p>Athlete Name; identity card number or other identification document; contact information; date of birth; gender; sport and discipline; nationality; coach’s name; doctor’s name; medical information including medication and supplements use, blood transfusion, etc.; and information produced as a result of any Sample provided by the Athlete subjected to doping control.</p> <p>If you return an Adverse Analytical Finding (“AAF”) or if your Sample needs further analysis or investigation, we can request additional information, including any information you provide to us in defence of an Anti-Doping Rule Violation charge or as evidence of mitigating circumstances.</p>
	ATHLETE SUPPORT PERSONNEL	Name, function e.g. doctor, coach, athlete representative etc.,) contact details.
Athlete’s Biological Passport	ATHLETE	<p>Name, identity card number or other identification document, contact information, date of birth, gender, sport, nationality, medical information, including pharmaceutical treatments and information derived from Sample are being processed when an Athlete is subjected to doping control. Environment temperature at Athlete’s location, exercise information at the time before the Sample is collected, Athlete condition 2 weeks prior to the Sample collection (altitude, training, location, and duration of stay, use of methods of altitude simulation), blood transfusion or loss of blood or blood donation during the 3 months preceding the collection of the Sample, exposure to extreme environmental conditions, participation in intensive endurance competitions, test results (blood and steroid profile).</p>
Reviewing Therapeutic Use Exemption (“TUE”) applications	ATHLETE	<p>Athlete name; contact details; date of birth; gender; sport and discipline; level of competition; Information about previous TUE applications; medical information (medical history, results of relevant examinations, laboratory investigations and imaging studies); medication details; medical practitioner’s information, (name, speciality; contact details), contents of correspondence in respect of the TUE.</p>

Purpose	Personal information	
	ATHLETE SUPPORT PERSONNEL	Medical practitioner’s information e.g. name, medical speciality; license number, contact details and reports, contents of correspondence in respect of TUEs), guardian’s information if the athlete is a minor.
Applying and enforcing the Anti-Doping Rules, including receiving and communicating intelligence to conduct investigations about Anti-Doping Rule Violations, conducting results management, issuing charges and bringing proceedings before the National Anti-Doping Disciplinary Panel for an Anti-Doping Rule Violation. Issuing and notifying our decisions, in anti-doping cases, for the purposes of ensuring transparency and to comply with applicable legislation.	ATHLETE	Maintaining records of CyADA’s anti-doping test missions’ outcomes, and Athletes with Whereabouts Failures (Unsuccessful location attempts, Missed Tests, Filing Failures); Doping test results, relevant correspondence, submissions and hearings content- any information you provide to us in defence of an anti-doping violation charge or as proof of mitigating circumstances, previous doping sanctions and decisions.
	ATHLETE SUPPORT PERSONNEL	Names, contact details, function, reports, correspondence, submissions and hearing contents, any information you provide to us in defence of an anti-doping violation charge or as proof of mitigating circumstances, previous doping sanctions and decisions.
	Other persons involved in the proceedings	Names, contact details, capacity, evidence and witness statements.
Scientific Research	ATHLETE	Where an Athlete gives consent for his/her sample(s) to be used for anti-doping research, a Laboratory will receive and first analyse his/her sample(s) and in line with the International Standard for Laboratories (ISL) and the World Anti-Doping Code (Code). After the analysis and the respective storage of sample(s) is completed, the Laboratory, instead of discarding their sample(s) will remove any identifiers so that the sample(s) can no longer be associated to the Athlete and use the sample(s) for anti-doping research in line with the Code and the ISL Code of Ethics and international and national standards for ethical research.

6. What is the legal basis for the above processing?

Compliance with legal obligations:

When we perform Doping Control, conduct anti-doping scientific research, conduct disciplinary proceedings, cooperate with government or law enforcement agencies, cooperate with WADA, and relevant International Federations, among other activities, we are acting in order to comply with our legal and regulatory obligations including: the Council of Europe Anti-Doping Convention that was ratified by Law 37(III) of 1993 and its Additional Protocol that was ratified by way of Law 6(III) of 2004, the International Convention against Doping in Sports of UNESCO that was ratified with Law 7(III) of 2009, as amended from time to time, Regulatory Administrative Acts issued on the basis of Law 7(III)/2009; and the World Anti-Doping Code and International Standards issued by WADA.

The processing we do is also necessary to perform our public interest functions and to exercise our official authority. This includes but is not limited to:

- i. planning, targeting, co-ordination and organisation of anti-doping tests;
- ii. collecting and analysing samples that you provide as part of the Doping Control process;
- iii. the implementation of the Athlete Biological Passport programme;
- iv. reviewing and assessing information and evidence you provide and managing applications for, and the granting of TUEs;
- v. communicating with you or about you, where necessary, to manage and enforce Cyprus Anti-Doping laws and regulations. This includes informing concerned federations and other relevant bodies of the conclusion of results management in case of an anti-doping violation;
- vi. collecting and maintaining intelligence we receive on Athletes, Athlete Support Personnel and other Person over who CyADA has jurisdiction under the law and where necessary using this and other information to conduct investigations into potential Anti-Doping Rule Violations;
- vii. analysis of results and intelligence, to help us improve our enforcement and educational activities;
- viii. applying and enforcing the Anti-Doping Rules, including conducting results management, issuing charges and bringing proceedings before the National Anti-Doping Disciplinary Panel for an Anti-Doping Rule Violation or Anti-Doping Appeals Panel and sharing relevant data with relevant third parties as set out in this Notice;
- ix. maintaining records of CyADA's anti-doping missions and test outcomes, and Athletes who have failed to be available for tests at the designated time or provided inaccurate whereabouts information (Whereabouts Failures)
- x. publishing our decisions, those of the National Anti-Doping Disciplinary Panel or Anti-Doping Appeals Panel, and those of other relevant bodies (for example, International Federations or other NADOs) in anti-doping cases, for the purposes of ensuring transparency and to comply with the Anti-Doping Rules;

Serving our legitimate interests:

We also process personal data in order to serve our legitimate interests for example protecting your and our data as part of our IT and security systems.

In other circumstances you may be asked to provide your **consent**. For example, CyADA seeks Athletes' consent for the use of their sample(s) for research purposes when samples would otherwise be destroyed. Where an Athlete agrees, their anonymised sample(s) will be used by WADA-accredited laboratories for anti-doping research in the pursuit of enhancing the analytical capabilities used to uphold clean sport. Athletes can withdraw this consent at any time until their sample is anonymised. There will be no consequences if an Athlete refuses to provide such consent, or withdraws it. For all of these purposes, we may be required to process your **sensitive personal (or 'special category') data** – this is necessary for reasons of substantial public interest, specifically for the purposes of eliminating doping in sport.

Where we require personal information to perform our functions as an Anti-Doping Organisation under the Code and Cyprus Anti-Doping Rules, including the collection of information on a Doping Control Form, whereabouts, or details and information we seek following analysis of a Sample, then provision of such data is mandatory: if you fail to provide information you are obliged to provide under the Code or Cyprus Anti-Doping Rules then this may itself be an Anti-Doping Rule Violation, it may invalidate competition results and may lead to a ban on participation in sport.

7. Who we share your information with?

Information may be shared with a number of third parties, including service providers and advisors. Particularly we share information with:

- WADA, specifically through ADAMS (a web-based data management system developed and administered by WADA which also includes any related mobile applications, like Athlete Central or DCO Central that are integrated with ADAMS) so that it can fulfil its own role under the Code. 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 (<https://adams-help.wada-ama.org/hc/enus/categories/360001964873-ADAMS-Privacy-and-Security>).
- Other Anti-Doping Organisations as defined in the Code, and other relevant organisations might receive personal information, including other National Anti-Doping Organisations i.e. those in other countries, International Federations, the International Olympic Committee, the International Paralympic Committee and Major Event Organisations, and other relevant organisations, including the National Olympic Committees, National Paralympic

Committees the home country Sports Councils and sports' national governing bodies. We also share information with the police and other law enforcement agencies, and other relevant regulators and authorities.

- Your legal adviser or representative if relevant, who may be involved in coordinating your response to any charge or investigation. You may choose to involve other third parties in your response to a charge or investigation (in particular, you may choose to involve your employer, trade union representatives or relatives).
- Police and other law enforcement agencies, disciplinary board, government and/or other relevant organisations, regulators and authorities as necessary, may be provided with personal information, if mandated by law or if required for the protection or furtherance of our legal or legitimate interests in compliance with applicable laws. This includes sharing information with the police and relevant professional regulators where there is evidence of criminal conduct or professional misconduct.
- Our legal advisers and other consultants
- The National Anti-Doping Disciplinary Panel and National Anti-Doping Appeals Panel,
- The Therapeutic Use Exemptions Committee for approval of exemptions for therapeutic use.
- Third party service providers, who will process it on behalf of CyADA for the purposes identified above. This includes the providers of WADA-accredited laboratory services, sample collection personnel, CyADA's IT service providers and Sample Collection Agencies that we use to conduct testing overseas and that are not signatories to the Code.
- A third party after you have provided us with your consent.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, and where no exemption applies, data is adequately protected by EU Commission approved standard contractual clauses. A copy of the relevant mechanism can be provided for your review – you can ask for this using the contact details below.

In the case of transfers to WADA and International Federations based in Switzerland, data is in these cases transferred to countries considered to adequately protect data under an EU adequacy decision.

8. Confidentiality, Data Security and Integrity

We have put in place and maintain reasonable measures to protect the confidentiality, security, and integrity of your information. Should you have any questions or concerns regarding the

security of your information you can contact us using the contact details below.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, or reporting requirements. To determine the appropriate retention period for personal data, we consider the applicable legal requirements, including the WADA International Standard for the Protection of Privacy and Personal Information (the “ISPPi”), the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

CyADA retention periods are in line with the ISPPi and the GDPR. Athletes’ personal information is registered in the ADAMS system through which WADA has access and can ensure that the Anti-Doping rules and regulations are respected. Basic retention periods are indicated in the table provided below.

Module	Data	Retention Periods
Athlete general information	Name, date of birth, sport, gender, contact information	10 years following the time when Athlete is excluded from ADO’s Testing Program.
Whereabouts	Whereabouts (other than city, country and in-competition whereabouts)	12 months as of the end of the whereabouts quarter for which the data was submitted
	Whereabouts failures (filing failures and missed tests)	10 years as of date of whereabouts failure
TUEs	TUE certificates and rejected TUE decision forms	10 years as of certificate date/date of rejection decision
	TUE application forms and supp. med information and any other	12 months from end of validity of TUE

Module	Data	Retention Periods
	TUE info not otherwise expressly mentioned herein. Incomplete TUEs	12 months from date of creation
Testing	Doping Control Forms Mission/Testing orders Chain of custody Incomplete Testing documentation or documentation not matched to a Sample	10 years as of Sample collection date Retained until all associated DCFs have been deleted 10 years as of document creation Date 12 months as of document creation date
Samples (Laboratory)	A and B sample	In most cases samples will be retained for 3 months after analysis, however, in certain circumstances we may retain samples for up to 10 years as of the date of collection in accordance with CyADA's long terms storage policy.
Test results/Results Management (forms/documentation)	Analytical test results (including AAF/ATF), laboratory reports, and other associated documentation	10 years as of test/creation of relevant documents.
Disciplinary Proceedings and Decisions (ADRV)	Sanctions and Decisions under the Code Relevant documentation/files (incl. AAF or whereabouts failure record, case files, laboratory and ABP, documentation packages, etc.)	Longer of 10 years or duration of sanction, as of date of final decision Longer of 10 years or duration of sanction, as of date of final decision
Athlete Biological Passport	Biological variables, ATPF, APF, APMU, reports, expert reviews and other supporting documentation Whereabouts (only city, country and In-Competition whereabouts)	10 years as of date of match between results and Doping Control Form 10 years as of end of the

Module	Data	Retention Periods
		whereabouts quarter for which the data was submitted

10. Your rights

CyADA has a number of obligations in relation to how it handles your personal data under the ISPPi and GDPR and is committed to the key principles of transparency, security and data minimisation.

In addition to relying on CyADA meeting its obligations, you have a number of rights that you are entitled to exercise although your ability to exercise these rights may be subject to certain conditions.

- You have the right to receive information about the processing of your personal information and to ask us for a copy of your information. You can also ask us to correct the personal information we hold about you. This enables you to have any incomplete or inaccurate information corrected.
- You can object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- You can ask us to delete your personal information where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- You can request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Where we are relying on your consent for the processing of your information, you can withdraw your consent for that specific processing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

These rights may be limited, for example if fulfilling your request would reveal personal data 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 interests in keeping. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, you can get in touch with us or our data protection officer directly using the contact details set out below. If you have unresolved concerns, you have the right to complain to the Office of the Commissioner for Personal Data.

11. Changes to this privacy notice

This Privacy Notice has been issued on 19 May 2023.

We may update this Privacy Notice from time to time. The amended Privacy Notice will be posted on CyADA's website. We may also notify you in other ways, from time to time, about the processing of your personal information.

12. Contact details

You can contact the Cyprus Anti-Doping Authority at:

Address:

*Indoor Hall "Tassos Papadopoulos-Eleftheria",
Makarion Athletic Centre Avenue,
Engomi, Nicosia, CY 2400, CYPRUS*

Email: info@cyada.org.cy

Telephone: +357 22774411

You can reach CyADA's Data Protection Officer at:

*Indoor Hall "Tassos Papadopoulos-Eleftheria",
Makarion Athletic Centre Avenue,
Engomi, Nicosia, CY 2400, CYPRUS*

Email: privacy@cyada.org.cy

Glossary

ADAMS	The Anti-Doping Administration and Management System is a Web-based database management tool for data entry, storage, sharing, and reporting designed to assist stakeholders and WADA in their anti-doping operations in conjunction with data protection legislation.
Adverse Analytical Finding	A report from a WADA-accredited laboratory or other WADA-approved laboratory that, consistent with the International Standard for Laboratories, establishes in a Sample the presence of a Prohibited Substance or its Metabolites or Markers or evidence of the Use of a Prohibited Method.
Anti-Doping Organisation	WADA or a Signatory that is responsible for adopting rules for initiating, implementing or enforcing any part of the Doping Control process. This includes, for example, the International Olympic Committee, the International Paralympic Committee, other Major Event Organisations that conduct Testing at their Events, International Federations, and National Anti-Doping Organisations.
Anti-Doping Rule Violation	One or more of the violations set forth in Article 2.1 through Article 2.11 of the World Anti-Doping Code.
Athlete	Any Person who competes in sport at the international level (as defined by each International Federation) or the national level (as defined by each National Anti-Doping Organization).
Athlete Biological Passport	The program and methods of gathering and collating data as described in the International Standard for Testing and Investigations and International Standard for Laboratories.
Athlete Support Personnel	Any coach, trainer, manager, agent, team staff, official, medical, paramedical personnel, parent or any other Person working with, treating or assisting an Athlete participating in or preparing for sports Competition.
Cyprus Anti-Doping Authority (CyADA)	The Cyprus Anti-Doping Authority as established by virtue of the Anti-Doping (Establishment of the Competent Authority) Decree of 2009. CyADA is the National Anti-Doping Organisation for the Republic and is the Competent Authority as that term is used in the Law and related legislation.
Cyprus Sport Organisation	The body as defined by the 1969-2002 Laws regarding the Cyprus Sports Organisation.

Doping Control	All steps and processes from test distribution planning through to ultimate disposition of any appeal and the enforcement of Consequences, including all steps and processes in between, including but not limited to, Testing, investigations, whereabouts, TUEs, Sample collection and handling, laboratory analysis, Results Management and investigations or proceedings relating to violations of the provisions of this Decree relating to Status During Ineligibility or Provisional Suspension.
Filing Failure	A failure by the Athlete (or by a third party to whom the Athlete has delegated the task) to make an accurate and complete Whereabouts Filing that enables the Athlete to be located for Testing at the times and locations set out in the Whereabouts Filing or to update that Whereabouts Filing where necessary to ensure that it remains accurate and complete, all in accordance with Article 4.8 of the International Standard for Testing and Investigations, and Annex B of the International Standard for Results Management.
International Federation	An international non-governmental organisation administering and governing a sport or sports at a global level.
Laboratory	A WADA-accredited laboratory applying Test Methods and processes to provide evidentiary data for the detection and/or identification of Prohibited Substances or Prohibited Methods on the Prohibited List and, if applicable, quantification of a Threshold Substance in Samples of urine and other biological matrices in the context of Doping Control activities.
Major Event Organisations	The continental associations of National Olympic Committees and other international multi-sport Organisations that function as the ruling body for any continental, regional or other International Event.
Missed Test	A failure by the Athlete to be available for Testing at the location and time specified in the 60-minute time slot identified in their Whereabouts Filing for the day in question, in accordance with Article 4.8 of the International Standard for Testing and Investigations and Annex B of the International Standard for Results Management.
National Anti-Doping Organisation	The entity or entities designated by a country as possessing the primary authority and responsibility to adopt and implement anti-doping rules, direct the collection of Samples, manage test results and conduct Results Management at the national level. The National Anti-Doping Organisation for Cyprus is CyADA.

National Federation	A national or regional entity in Cyprus which is a member of or is recognized by an International Federation as the entity governing the International Federation's sport in that nation or region in Cyprus.
National Olympic Committee	The Organisation recognized by the International Olympic Committee as being the National Olympic Committee for a country. In the Republic the National Olympic Committee is the Cyprus National Olympic Committee.
National Paralympic Committee	The Organisation recognized by the International Paralympic Committee as being the National Paralympic Committee for a country. In the Republic the National Paralympic Committee is the Cyprus National Paralympic Committee.
Person	A natural Person or an Organisation or other entity.
Personal Information	
Sample	Any biological material collected for the purposes of Doping Control.
Testing	The parts of the Doping Control process involving test distribution planning, Sample collection, Sample handling, and Sample transport to the laboratory.
Therapeutic Use Exemption (TUE)	A Therapeutic Use Exemption allows an Athlete with a medical condition to Use a Prohibited Substance or Prohibited Method, but only if the conditions specified by Article 4.4 of the Code, the International Standard for Therapeutic Use Exemptions and Part VI, paragraphs 26-32 of this Decree are met.
WADA	The World Anti-Doping Agency.
Whereabouts	Information, including without limitation Sensitive Personal Information, relating to an identified or identifiable Participant or other Person whose information is Processed solely in the context of an Anti-Doping Organization's Anti-Doping Activities.
Whereabouts Failure	A Filing Failure or a Missed Test
World Anti-Doping Code	The World Anti-Doping Code 2021