

2018 ISPPPI Review - Stakeholder Consultation

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NADO - NADO

Article 3 – Terms and Definitions

Term "public interest" or "substantial public interest" could be defined.

Article 6 – Processing Personal Information in Accordance with Law or with Consent

Comment on comment 6.1: is it reasonable to refer only to the Registered Testing Pool (not just generally Testing Pools)?

Article 11 – Rights of Participants and Other Persons with Respect to Personal Information

- 1) Comment 11.1 should be numbered as 11.0.
- 2) it seems appropriate to address the principle of "right to be forgotten" in this section (referring to the EU data protection directive)

General Comments

Thank you for this opportunity to comment on the data protection principles within anti-doping context. Hereby EADA makes two additional and more general comments:

- 1) anti-doping organisations should be entitled to regulate the principles of disclosing personal data regarding minors and low-level athletes; so far the topic has been very vague in the Code. The Standard could make the task more specific.
- 2) in case there has been a security breach, it should be distinguished if (a) the anti-doping organisation has been a subject of a cyber attack or a ransom or (b) if the organisation has not taken the necessary security measures.