



FIH ANTI-DOPING PRIVACY NOTICE

Purpose

The FIH Anti-Doping Rules requires athletes and athlete support personnel to furnish a significant amount of personal information to FIH and their relevant National Anti-Doping Organization (NADO).

The Administration of the FIH Anti-Doping Program requires and results in employees and third-party contractor or other having access to a myriad of private and personal data.

As a result, it is essential that the FIH, just like all other ADOs subject to the World Anti-Doping Code, appropriately protect the personal information that it processes both to meet legal standards and to ensure the continued confidence and trust of those involved in hockey.

The purpose of this internal memo is to outline the reason behind these processes and their implementation. It has been prepared in accordance with FIH's obligations under the International Standard for the Protection and Privacy of Personal Information (ISPPPI) and the GDPR.

Scope

FH acknowledges its responsibility for ensuring that personal information processed in connection with all its anti-doping activities is protected as required by data protection and privacy laws, principles and standards, notably the ISPPPI and the GDPR.

There are a variety of safeguards taken by FIH to ensure that it adheres to a set of minimum privacy protections when collecting and using athlete personal information such as information relating to whereabouts, doping controls and TUEs.

Applicable legislation: the ISPPPI

FH respects and implements the ISPPPI and conforms to all its principles when collecting and handling personal information pursuant to the Code and its FIH Anti-Doping Rules.

By respecting the principles of the ISPPPI, FIH makes sure to apply appropriate, sufficient and effective privacy protections to the personal information it processes when conducting its anti-doping program, in recognition of the fact that personal information gathered in the anti-doping context can impinge upon and implicate the privacy rights of persons involved in and associated with organized sport.

The FIH Anti-Doping Rules recognize and affirm the importance of ensuring that the privacy rights of persons subject to anti-doping programs based on the World Anti-Doping Code are fully respected.

Because the ISPPPI requires personal data to be collected and processed on the basis of consent, or another legal basis, FIH has made it clear both in the FIH Anti-Doping Rules, which all FIH athletes agree to comply with as a matter of eligibility, and the Athletes Agreement, which all athletes agree to as a condition of participating in FIH events, that all athletes consent to FIH's usage of their information; so long as this information is used in accordance with the ISPPPI and any other applicable data privacy laws.

Specifically, FIH respects the ISPPPI principles with regards to personal information. Personal information is defined as including, but not being limited to, information relating to an athlete's name, date of birth, contact details and sporting affiliations, whereabouts, designated therapeutic use exemptions, anti-doping test results, and results management (including disciplinary hearings, appeals and sanctions).

Personal information also includes personal details and contact information relating to other persons, such as medical professionals and other persons working with, treating or assisting an athlete in the context of anti-doping activities. Such information remains personal information and is regulated by the ISPPPI and by reference the FIH Anti-Doping Rules for the entire duration of its processing, irrespective of whether the relevant individual remains involved in organized sport.

FIH also fully complies with the ISPPPI with regards to sensitive personal information. Sensitive personal information is defined as *personal information relating to a participant's racial or ethnic origin, commission of offences (criminal or otherwise), health (including information derived from analyzing an athlete's samples or specimens) and genetic information.*

The applicable provisions in the FIH Anti-Doping Rules

For ease of reference, the relevant portions of the 2021 FIH Anti-Doping Rules read as follows:

Article 14 Confidentiality and Reporting

(...)

14.6 Data Privacy

14.6.1 FIH may collect, store, process or disclose personal information relating to *Athletes* and other *Persons* where necessary and appropriate to conduct its *Anti-Doping Activities* under the *Code*, the *International Standards* (including specifically the *International Standard for the Protection of Privacy and Personal Information*), these Anti-Doping Rules, and in compliance with applicable law.

14.6.2 Without limiting the foregoing, FIH shall:

- (a) Only process personal information in accordance with a valid legal ground;

- (b) Notify any *Participant* or *Person* subject to these Anti-Doping Rules, in a manner and form that complies with applicable laws and the *International Standard* for the Protection of Privacy and Personal Information, that their personal information may be processed by FIH and other *Persons* for the purpose of the implementation of these Anti-Doping Rules;
- (c) Ensure that any third-party agents (including any *Delegated Third Party*) with whom FIH shares the personal information of any *Participant* or *Person* is subject to appropriate technical and contractual controls to protect the confidentiality and privacy of such information.

Practical application

As a condition of participation in hockey all FIH athletes agree and consent to sharing their personal information, sometimes sensitive, in the course of the mandatory FIH anti-doping activities and procedures.

All FIH athletes can be confident that any personal and sensitive information they share as a condition to and by virtue of their participation in hockey is being protected by a variety of unyielding privacy safeguards.

FIH is responsible for ensuring that any information that is processed in the day to day administration of the FIH Anti- Doping Program is stored safely, dealt with and shared strictly in utmost confidentiality and retained only as long as necessary in respect of both the ISPPPI and the FIH Anti-Doping Rules.

All FIH employees, third party contractors and ADO's with whom agreements are signed (sharing, testing, or other) have or will be required to sign Agreements and or contracts containing confidentiality clauses that respect both the ISPPPI and the GDPR.