

Table of Contents

Introduction.....	2
Definitions.....	2
Data Collection.....	3
Purpose of Processing of Personal Information.....	3
Disclosure.....	3
International Transfers.....	4
Rights with Respect to Personal Information.....	4
Retention.....	6
Security Measures.....	6
Release.....	6
Contact Information.....	7
Version History.....	7

Introduction

1. WFDF recognizes the importance of ensuring that the privacy rights of persons subject to Anti Doping programs based on the WFDF Anti-Doping Rules (the “WFDF ADR”) are fully respected.
2. Specifically, WFDF is responsible for ensuring that Personal Information which it acquires and processes in connection with its Anti-Doping activities is protected in accordance with the applicable data protection and privacy laws.
3. This policy provides information that complements the information provided on the Doping Control Form that Athletes are asked to sign in the course of any Sample Collection initiated by WFDF, on how Personal Information for anti-doping purposes will be processed by WFDF.

Definitions

4. Athlete’s Personal Information for anti-doping purposes includes, but is not limited to, information relating to:
 - A. Athlete’s identity (name, nationality, date of birth, gender, event, type of competition, organizations to which the Athlete belongs, names and details of other persons, such as medical professionals, working with, treating or assisting the Athletes in the anti-doping context);
 - B. Whereabouts Information;
 - C. Therapeutic Use Exemptions (TUEs);
 - D. Doping Controls (including Test Distribution Planning, Sample Collection and handling, Anti-Doping test results, Laboratory analysis, results management, hearings);
 - E. Medical or biological information derived from Anti-Doping Activities, including information derived from analyzing of Samples or specimens (Sensitive Personal Information).
5. Anti-Doping Activities: Activities specified by the World Anti-Doping Code (the “Code”) and the World Anti-Doping International Standard for the Protection of Privacy and Personal Information (the “ISPPPI”) to be carried out by Anti-Doping Organizations, and their Third Party Agents, for the purpose of establishing whether Anti-Doping Rule Violations took place, including collecting Whereabouts Information; Testing; Results Management; determining whether an Athlete’s Use of a Prohibited Substance or Prohibited Method is strictly limited to legitimate and documented therapeutic purposes; educating the Athletes on their rights and responsibilities; investigations of Anti-Doping Rule Violations; and initiating legal proceedings regarding such violations.
6. Processing: Collecting, retaining, storing, disclosing, transferring, transmitting, amending, deleting or otherwise making use of Personal Information.

7. Security Breach: Any unauthorized and/or unlawful Processing of, including access to, Personal Information whether in electronic or hard-copy or other form, or interference with an information system, that compromises the privacy, security, confidentiality or integrity of Personal Information.

8. Sensitive Personal Information: Personal Information relating to an Athlete's racial or ethnic origin, Athlete's photographic identity (type/number), health (including information derived from analysing a Athlete's Samples or Specimens) and genetic information.

9. Third Party: Any person or legal entity other than the Person to whom the relevant Personal Information relates, Anti-Doping Organizations and Third Party Agents.

10. Third Party Agent: Any person or legal entity, public authority, agency or body, including without limitation subcontractors and their subcontractors, who processes Personal Information for or on behalf of an Anti-Doping Organization.

Data Collection

11. Personal Information will be collected by WFDF and by any other organization or body to which WFDF has delegated authority or that otherwise has competent authority to conduct Testing.

Purpose of Processing of Personal Information

12. WFDF shall only process Personal Information when and to the extent necessary and appropriate to conduct its Anti-Doping Activities under the WFDF ADR, ISPPPI or where otherwise required by applicable law or regulation, and where such Processing does not conflict with applicable privacy and data protection laws. This includes, but is not limited to, processing Personal Information:

- A. to determine eligibility for a TUE;
- B. to conduct Testing and to record the results from such Testing;
- C. to conduct investigations to determine Violations of WFDF ADR;
- D. to carry out Results Management under the WFDF ADR, including associated disciplinary proceedings, appeals and adjudications, and to publish outcomes.
- E. For any purpose relating to the protection of clean sport.

Disclosure

13. Personal Information may be disclosed by WFDF to Third-Party agents, including authorized service providers, such as the Sample Collection Authorities, in connection with the fulfillment of their Anti-Doping Activities under the WFDF ADR.

14. Personal Information may be made available to authorized Anti-Doping Organization, for instance, designated National Anti-Doping Organizations of Athlete's

home or residence country, major games organizers, or WADA to Anti-Doping Organization with which the WFDF has concluded a Sharing Agreement in accordance with the Code, and processed in accordance with the anti-doping provisions of the Code in order to allow those authorized Anti-Doping Organizations to fulfil their obligations and responsibilities under the Code.

15. Personal Information shall not be disclosed to Third Parties other than as set out above, except where such disclosures:

- A. are required by law;
- B. take place with Athlete's informed, express and written consent; or
- C. are necessary to assist law enforcement or governmental authorities in the detection, investigation or prosecution of a criminal offense or breach of the Code, provided that the Personal Information is reasonably relevant to the offense or breach in question and cannot otherwise be obtained by the authorities.

16. Personal Information may be Publicly Disclosed by WFDF in certain limited situations as further specified in the WFDF ADR (such as disclosure of test results or judicial panels' decisions).

International Transfers

17. Personal Information may be made available by WFDF to third persons or parties, including authorized service providers, WADA and Anti-Doping Organizations that are located in different countries.

18. For instance, Athlete's Personal Information for anti-doping purposes will be held in the Anti-Doping Administration and Management System (ADAMS), located in Canada and maintained by WADA or transferred to authorized service providers or Anti-Doping Organizations in countries where they train or participate in competitions.

19. Applicable rules will be respected and appropriate measures taken prior to any transfer of Personal Information abroad.

Rights with Respect to Personal Information

Right of Access to Personal Information

20. Athletes have the right to seek information from WFDF (antidoping@wfdf.sport) about their Personal Information (the categories of information, the purpose for which it is collected and the third parties or categories of third parties to which it is transferred), to obtain confirmation of whether or not their Personal Information is being processed and to receive a copy of the relevant Personal Information in a readily intelligible format within a reasonable timeframe, unless to do so in a particular case

plainly conflicts with the WFDF's ability to plan or conduct Testing under the WFDF ADR or to investigate and establish anti-doping rule violations.

21. WFDF may not be required to respond to requests seeking access to Personal Information if the requests are excessive in terms of their scope or frequency or if they impose a disproportionate burden on WFDF in terms of cost or effort given the nature of the Personal Information in question. If WFDF refuses to allow the Athlete access to Personal Information, it shall inform this Athlete and explain in writing the grounds for refusing the request as soon as practicable.

Right to Amend Personal Information

22. Personal Information processed by WFDF shall be accurate, complete and kept up to date. Where WFDF affirmatively knows that the Personal Information that it is processing is inaccurate or incomplete, WFDF shall, as appropriate, rectify, amend, complete, update or delete the relevant Personal Information as soon as possible. Where appropriate, if the Personal Information in question has been disclosed to a third party that is known or believed to continue to process the Personal Information, the third party shall be informed of the change as soon as possible.

Right to Object to the Processing of Personal Information

23. Athletes have the right to object to the processing of their Personal Information.

Right to Initiate a Complaint

24. Athletes are entitled to initiate a complaint where they have a reasonably good faith belief that WFDF is not complying with the ISPPPI or with applicable law.

The complaint shall be made to WFDF by registered courier:

World Flying Disc Federation (WFDF)
Attention: Privacy Officer
5825 Delmonico Drive, Suite 370
Colorado Springs, CO 80919 USA

and by email to: privacy@wfdf.sport

25. In the event that a complaint is not satisfactorily resolved, Athletes may notify WADA which will determine whether WFDF is adhering to the ISPPPI. Where the decision is that the ISPPPI is not being adhered to, WFDF will take the necessary steps to rectify the position.

26. Without prejudice to the above-mentioned rights, any person whose Personal Information is processed has the right to lodge a complaint with a supervisory authority according to applicable laws.

Retention

27. WFDF shall ensure that Personal Information is only retained for as long as is necessary to fulfill its obligations under WFDF ADR or where otherwise required by applicable law, regulation or compulsory legal process. WFDF will respect the retention times for different types of Personal Information as may be determined by WADA from time to time unless such retention times are in breach of applicable law.

28. The form and manner of retention shall follow the 'Retention Times' set under Annex A of the ISPPi.

29. Once Personal Information no longer serves the above purposes, it will be deleted, destroyed or permanently anonymized.

Security Measures

30. WFDF shall at all times protect an Athlete's Personal Information by applying all necessary security safeguards, including physical, organizational, technical, environmental and other measures to prevent the loss, theft or unauthorized access, destruction, use, modification or disclosure (including disclosure made via electronic network) of the Personal Information.

31. In addition to this Policy, the documents in place are the WFDF Data Privacy Control Process, the WFDF Data Breach Response Procedure and the WFDF Anti-Doping Privacy Notice.

Release

33. By participating in international events, an Athlete will release WFDF from all claims, liabilities, damages, costs and expenses that they may have in connection with the processing of their Personal Information including, but not limited to, the Processing of their Personal Information through ADAMS and/or any other relevant administration/management system.

Contact Information

Anti-Doping Email: antidoping@wfdf.sport

Anti-Doping Webpage: wfdf.sport/anti-doping/

Privacy Email: privacy@wfdf.sport

Version History

Version	Date	Approval	Notes
1.0	2025-12-10	MADC*	Updated document template.

*MADC: Medical and Anti-Doping Commission