

ANTI-DOPING PRIVACY POLICY

Summary of how the Fédération Equestre Internationale (FEI) uses your data.

- The FEI processes participants' data to carry out its regulatory powers under its Anti-Doping Rules for Human Athletes (ADRHA), Equine Anti-Doping and Controlled Medication Regulations (EADCMR) and the World Anti-Doping Code.
- The FEI will particularly use your data to carry out doping tests, maintain details of participant whereabouts for the purpose of carrying out testing, collecting and creating intelligence to help ensure that testing is appropriately targeted, and use results of testing to enforce its Anti-Doping Rules. We will use anti-doping service providers to assist us in carrying out this processing.
- We will process sensitive personal data in carrying out this processing. We do this for the purposes of eliminating doping in sport and protecting the integrity of the sport. This may be based on specific local laws, on the FEI's entitlement to establish or bring any relevant legal claim or – if required – your consent. If we are required to seek your consent, but you refuse to provide it or withdraw it, this may in some circumstances constitute an anti-doping rule violation under the ADRHA, EADCMR and World Anti-Doping Code and could lead to a sanction.
- Data may be collected by and shared with a number of third parties. Information may be collected by and shared with the International Testing Agency, who carry out a number of the FEI's human anti-doping activities. Information may be shared with the police where there is evidence of criminal conduct. Information including data on potential and/or alleged anti-doping violations may also be shared with WADA, national anti-doping authorities, national federations, relevant event organisers and any other body with relevant doping responsibility. Data is also shared with the FEI's panels as necessary for disciplinary and tribunal proceedings, and may be published where you are banned as a result of an adverse finding.
- You can choose to ask us to share information about a charge or investigation with other third parties. You can withdraw this consent at any time.
- Our anti-doping privacy policy sets out more details of this processing, including details of your data protection rights, including your right to object to certain processing.

What does this policy cover?

This policy describes how the FEI will make use of your data that is collected under its Anti-Doping Rules for Human Athletes (ADRHA), Equine Anti-Doping and Controlled Medication Regulations (EADCMR) and World Anti-Doping Code.

This policy describes your data protection rights, including a right to object to some of the processing which the FEI carries out. More information about your rights, and how to exercise

them, is set out in the “What rights do I have?” section. Definitions used in this policy reflect those used in the ADRHA and EADCMR.

What information does the FEI’s anti-doping team collect?

The FEI anti-doping team collects and processes personal data about Athletes and Athlete Support Personnel – this may be collected by the FEI’s own employees or by service providers or sample collection agencies we use to help us carry out testing and anti-doping activities. The information collected directly by the FEI (or by its service providers) includes information you provide on your whereabouts, your application for a Therapeutic Use Exemption and data provided as part of a test.

If you are being investigated for a potential and/or alleged anti-doping rule violation under either the ADRHA or EADCMR, we may gather further information from you on the circumstances of your alleged violation. This may include any information you provide by way of defence or mitigation.

What information is provided to the FEI by third parties for anti-doping purposes?

Personal data will be collected by the FEI's third party service providers. As set out above, this will include anti-doping service providers who carry out sample collection and analysis on our behalf. Information may also be provided by a number of other third parties. We will receive intelligence on doping matters from NADOs, from WADA, from the media, from members of the public, the police and other third parties such as other national or international federations, governing bodies or competition organisers.

Where you choose to involve a third party, such as a lawyer, or independent experts, we may also receive information from them.

How does the FEI use this information, and what is the legal basis for this use?

The FEI will use this information for the following purposes:

- As required by the FEI to conduct its anti-doping responsibilities and pursue its legitimate interests, in particular:
 - communicating with you or about you where necessary to administer the sport and anti-doping programme and enforce the FEI’s ADRHA and EADCMR, including informing you and your national federation of any positive test, sharing relevant data with other relevant third parties as set out this policy, and responding to any questions you send to the Anti-Doping team;
 - maintaining intelligence we receive on Athletes, Support Personnel and Persons Responsible to help us carry out intelligence led testing;

- manage details of your whereabouts, including sharing this with other organisations with testing jurisdiction through ADAMS and using this information to carry out out-of-competition testing;
 - maintaining records of the FEI's anti-doping missions and test outcomes, and Athletes or Persons Responsible who have failed to be available (or make horses available) for tests at the designated time;
 - managing information relating to any Therapeutic Use Exemption, including making the decisions on whether such TUEs shall be granted; and
 - publishing our decisions in anti-doping cases, for the purposes of ensuring transparency and to comply with our obligations under the World Anti-Doping Code and under the EADCMR;
- For purposes which are required by law:
 - In response to requests by government or law enforcement authorities conducting an investigation.
 - Where you have given your consent:
 - we may share and receive information with other third parties you wish to involve in any investigation or charge, such as, expert witness, a lawyer or relative;
 - where we are required to seek your consent, such as in countries where processing of your health information cannot be justified on an alternative legal basis.

For many of these purposes, we may be required to process your sensitive or special category personal data – this can include details of Therapeutic Use Exemptions, details of your sample results and information relating to your whereabouts where this discloses you are at a medical facility or a place of worship. Unless we state otherwise, we will process this in order to ensure that we are able to establish and exercise our legal claims as necessary where you are (or might be) in breach of our rules and for the purposes of enforcing the measures we have put in place to carry out recognized anti-doping activities in accordance with our obligations under the World Anti-Doping Code and EADCMR.

Withdrawing consent

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. If we are required to seek your consent, but you refuse to provide it or withdraw it, this may in some circumstances constitute an anti-doping rule violation under the ADRHA and could lead to a sanction.

Who do we share data with, and where?

Data may be shared with a number of third parties. Information may be shared with the police where there is evidence of criminal conduct. Information, including information relating to your whereabouts, may also be shared with WADA, national anti-doping authorities, national federations, relevant event organisers and any other body with relevant doping responsibility. Data is also shared with the FEI's panels as necessary for disciplinary and tribunal proceedings, and may be published where you are banned as a result of an adverse finding.

Information of a potential and/or alleged anti-doping violations may also be shared with your national federation and relevant NADOs, who will help co-ordinate a response.

You may choose to involve third parties in your response to a charge or investigation (in particular, you may choose to involve an owner of a horse, chefs d'équipe, national federation representative, external lawyers or relatives).

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of the parties' legal or legitimate interests in compliance with applicable laws.

Personal data may also be collected by and shared with third party service providers, who will process it on behalf of the FEI for the purposes identified above. This may include the providers of sample collection services, laboratory services, IT services, and testing services. The FEI also uses the International Testing Agency to carry out a number of its human anti-doping activities. Where information is transferred outside the EEA/Switzerland, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, our transfers internationally benefit from the exemption for important public interest transfers under the GDPR, and no mechanism is required. In the case of transfers to WADA, data in this case is transferred to countries considered to be adequately protected data under an EU and Swiss adequacy decision.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete** or **restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement).

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 legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in applicable local laws, as well as under Swiss law. 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 using the details set out below. If you have unresolved concerns, you have the **right to complain** to a competent authority. In the EU, this may be a data protection authority where you live, work or where you believe a breach may have occurred.

Information that is provided in order to comply with our ADRHA is mandatory. Failure to provide this information could result in a charge under those Rules.

How do I get in touch with the FEI, or its data protection officer?

The FEI hopes that it can satisfy queries you may have about the way it processes your data. If you have any concerns about how your data is processed, you can get in touch at info@fei.org or by writing to the FEI's Data Protection Officer at this address: Fédération Équestre Internationale, HM King Hussein I Building, Chemin de la Joliette 8, 1006 Lausanne - Switzerland, and at dpo@fei.org.

How long will you retain my data?

Information relating to intelligence gathered in relation to anti-doping matters, whereabouts, TUEs granted and internal records of decisions – and the reasons for decisions taken by on disciplinary matters or to prevent or withdraw a registration on anti-doping matters - will be reviewed every 10 years. If the FEI considers that ongoing retention is justified, it will continue to retain relevant information until at least the next review. The FEI will also review the information it holds about you at the end of any investigation or case to ensure this remains relevant. For particularly serious cases, and where you may have an ongoing role in the sport, we may inevitably hold information indefinitely, but this will remain subject to review.

Information about charges and decisions made that result in a ban or suspension may be published until the end of any ban or suspension or for one month, whichever is the longer. Details of charge, decisions and written reasons for decisions will then be retained in accordance with the review period set out above.

Information relating to a negative test will be removed after 10 years, to ensure that this is retained for ten years to allow for further testing as required under the ADRHA.