## ANNEX to the INTERNATIONAL STANDARD ON PROTECTION OF PRIVACY AND PERSONAL INFORMATION

## **RETENTION TIMES**

ADRV: anti-doping rule violation AAF: adverse analytical finding ATF: atypical finding NAF: non-analytical finding

- I. Referenced data will be deleted no later than the end of the calendar quarter following the expiry of the stated retention period.
- II. For practical reason, retention times are submitted to 2 categories; 18 months and 8 years.
- III. Retention times can be extended in case of pending anti-doping rule violations.

Module	Data	Retention periods	Remarks	Criteria
1 – Athlete		as of time when athlete is excluded from ADO's testing pool:	Athlete data relevant for practical purposes and because of multiple violations These data are not particularly sensitive Managed by ADO	
Athlete (general)	Name Date of birth Sport discipline Gender	Indefinitely Indefinitely Indefinitely Indefinitely	This can be retained indefinitely. ADOs should be allowed to keep a record of athletes that have been part of their testing pool. For elite athletes, this information is public information anyway.	
	Phone number(s) Email address Home address	8 yrs 8 yrs 8 yrs	8 years because of possible ADRV: AAF/ATF (stored sample) or NAF 8 years because of possible ADRV: AAF/ATF (stored sample) or NAF 8 years because of possible ADRV: AAF/ATF (stored sample) or NAF	Necessity Necessity Necessity
2 – Whereabouts (except for the Athlete Passport program see section 8)		as of date to which the data relate:	Only small amount of Whereabouts is relevant to retain, but it is impossible to establish which part	
Whereabouts	Whereabouts Failures Missed tests	18 months 18 months 18 months	Can be relevant to establish ADRV retrospectively Relevant to count three Strikes in 18 months time Relevant to count three Strikes in 18 months time If ADRV, will be kept as part of disciplinary file indefinitely (see section 7).	Necessity Necessity Necessity
3 – TUE			Destroying medical information makes it impossible for WADA to review TUEs retrospectively after TUE has lost its validity TUE information is largely medical and therefore specifically sensitive Managed by ADO / TUEC	
TUE	TUE approval forms	8 yrs as of approval date	Can be relevant in case of re-testing	Proportionality / Necessity
	TUE supp. med information TUE info not included: (i) on the approval form; or	18 month from end of validity of TUE	Loses relevance after expiration of TUE except in case of re-application (and sensitive information)	Proportionality
	(ii) in the supporting medical information			

Module	Data	Retention periods	Remarks	Criteria
4 – Testing		as of document creation date / as of first indication of AAF, ATF, ADRV or taking of sample	Long retention only relevant in case of AAF, ATP, ADRV or stored sample(s) Managed by ADO	
Testing	Mission orders	18 months / 8 yrs	18 months if there is no indication of an ADRV/ 8 yrs if there is an indication of a possible ADRV, if the sample is stored for possible re-testing or if it is part of a passport program.	Proportionality /Necessity
	Doping Control Form	18 months / 8 yrs	18 months if there is no indication of an ADRV/ 8 yrs if there is an indication of a possible ADRV, if the sample is stored for possible re-testing or if is part of a passport program. Yrs	Proportionality /Necessity
	Chain of Custody	18 months/ 8 yrs	18 months if there is no indication of an ADRV/ 8 yrs if there is an indication of a possible ADRV, if the sample is stored for possible re-testing or if it is part of a passport program.	Proportionality /Necessity
5 – Samples (lab)			Only positive samples are a possible privacy issue Managed by Laboratory	
Samples	A sample	Indefinitely / 8 yrs	These samples are anonymous, and may be retained indefinitely for scientific purposes	Proportionality
	B sample	Indefinitely / 8 yrs	In case of an AAF, and if the sample is identifiable 8 yrs should be the maximum retention time	Proportionality
6 – Test results/Results management (forms/ documentation)		as of creation of relevant documents:	Relevant because of multiple violations and retrospective analysis Managed by ADO	
Results	Negative findings	8 yrs	Negative results have an historical value and keeping them could be in the interest of the athlete.	Proportionality /Necessity
Results	AAF ATF	8 yrs 8 yrs	Necessary because of multiple violations Necessary because of multiple violations	Necessity Necessity
7 – Disciplinary Rulings (ADRV)			Relevant because of multiple violations Managed by disciplinary body / sports federation / ADO	
Disciplinary rulings	Sanctions under the Code Awards Relevant supporting documentation/files	Indefinitely Indefinitely Indefinitely	Should be kept indefinitely for legal and precedential value.	Necessity Proportionality

\* Differentiation between samples and results. As samples are not used for directly establishing ADRV, samples will not be stored, only results
\* For blood there are no A or B samples
\* Only positive samples are a possible privacy issue. Biological passport samples are not positive samples

Results	Results		For the biological passport (blood module), the endocrinological urine module or longitudinal profiling the retention time for results is 8 yrs 8 yrs when needed to support atypical/abnormal results/to refute athlete's claims	Necessity
Whereabouts	Whereabouts	8 yrs as of date the data relates to	For cases where circumstances warrant for negative results to be stored for future inclusion in the biological passport (blood module/endocrinological urine module): 8 yrs (only needed for limited amount of athletes)	Necessity