

UIAA CODE FOR USING ANTI-DOPING TEST DATA  
(incl. Whereabouts, Results Management & TUE data)

## PREAMBLE

This policy describes the UIAA's (International Climbing & Mountaineering Federation) procedures for collecting, using and storing data in accordance with the International Standard for the Protection of Privacy and Personal Information (ISPPPI). The UIAA shall ensure it can obtain, assess, and process anti-doping Informations from regular Anti Doping Testing, results management and the applications for and the granting of Therapeutic Use Exemptions (TUE).

This policy describes the UIAA's procedures for collecting, using and storing data concerning the Whereabout, Results management and TUE data in accordance with the International Standard for the Protection of Privacy and Personal Information (ISPPPI).

## RESPONSIBILITIES

The UIAA Anti-Doping Commission is responsible for the implementation and follow-up of this policy and subsequent procedures. UIAA Anti Doping Commission President contact is [marandjelkovic@gmail.com](mailto:marandjelkovic@gmail.com)

## UIAA'S POLICY FOR HANDLING ANTI-DOPING TEST DATA

### I. SECURITY AND CONFIDENTIALITY

The UIAA's Anti-Doping Commission is bound by a confidentiality agreement in terms of their position within the UIAA to ensure that all intelligence received is kept confidential. Any disclosure to other UIAA office staff shall be on a strict need-to-know basis only and any person who receives such information shall maintain its strict confidentiality. It is empirical that no identity shall be disclosed without prior consent, and that all confidential information is only used for legitimate anti-doping purposes, and that the risk of inadvertent disclosure is properly addressed.

### II. STORAGE OF INFORMATION

The UIAA's Anti-doping Commission President shall ensure that the collected information and the UIAA's operational data are handled securely. Any confidential documents will be marked as such and will be retained separately for any other UIAA's documents or databases, through the following appropriate means:

1. All correspondence is only done using the Microsoft Outlook platform.
2. All information will be stored in ADAMS.
3. Access to these ADAMS directories is strictly controlled and regulated by the UIAA Anti-Doping commission.
4. All IT equipment used by the UIAA Anti-Doping Commission will be properly controlled with the most current firewall network and anti-virus protections. The firewall protection shall filter all incoming and outgoing traffic and serve as a suitable barrier for unauthorized access to data. The antivirus protection shall defend against internal attacks like malicious files, viruses, worms, etc.
5. No files will be shared with anyone unless in PDF format and suitably encrypted.
6. There will be no physical storage of hard-copy documents.
7. There is no storage of confidential data on UIAA office or UIAA office staff IT systems, all confidential data is controlled by members of the UIAA Anti-doping Commission via ADAMS.
8. UIAA Athlete License data is stored on the UIAA registration database run by [Vertical Life – whose data privacy policy can be seen here](#) - including their policy detailing the process in the event of a data breach in section 9.1.
9. Although no confidential data is held on the UIAA website the [privacy policy covering this can be viewed here](#). This covers [www.theuiaa.org](http://www.theuiaa.org) and [www.iceclimbing.sport](http://www.iceclimbing.sport)

**Retention Times (according to ISPPi Annex A):**

10 Years in general;

Whereabouts information - 12 Month (except Whereabouts Failures – then 10 Years)

### **III. PROTECTION OF THE SOURCES OF INTELLIGENCE**

Within UIAA's scope, the UIAA Anti-Doping Commission President ensures the protection of the sources of intelligence as deemed appropriate. When proceeding with intelligence sharing or dissemination, no identity shall be disclosed without prior consent of the source.

### **IV. RISK OF LEAKS OR INADVERTENT DISCLOSURE**

Per point "I" above, the UIAA Anti-Doping Commission ensures that the risk of leaks and inadvertent disclosure of intelligence captured is reduced to the best of its ability. Should such an event occur, the UIAA Anti-Doping Commission President shall promptly evaluate the nature of the leak, and any consequences, and take such remediation measures as appropriate. The UIAA shall keep a record of the facts relating to the leak or disclosure, its effects, and remedial actions taken.

If information is leaked, this will be investigated by the UIAA Court who will recommend suitable preventative measures which will be approved by the UIAA Executive Committee.

### **V. SHARED INFORMATION**

Where intelligence is shared with the UIAA by other parties (i.e. health, law enforcement agencies, sports organization, other Anti-Doping Organizations, etc.), the UIAA Anti-doping Commission will confirm in writing that all intelligence received is processed, used and disclosed according to the procedures set out in points I, II and III, and only for legitimate purposes.

Where intelligence is shared by the UIAA with other parties, the UIAA will require the same written confirmation from such other parties. The UIAA will use secure communication tools when transferring any confidential information to external parties.

## **VI. OTHER DOCUMENTS**

Please see the UIAA Anti-Doping Data Recording Process and UIAA Anti-Doping Risk Assessment Matrix.