



IRONMAN Anti-Doping Data Privacy Notice

1) Purpose, Legal Basis and Scope

IRONMAN (“we,” “our” “us”) processes personal information of Participants (Athletes and Athlete Support Personnel) in connection with Anti-Doping Activities under the World Anti-Doping Code and International Standards. This Policy describes, in a clear and accessible manner, the types of anti-doping personal information we process, why we process it, who may receive it, if and when public disclosure may occur, rights, complaints, retention times, and the consequences of refusing doping control or consent—as required by Articles 6.2 and 7 of the International Standard for the Protection of Privacy and Personal Information ([ISPPPI](#)).

This Policy applies to personal information processed by IRONMAN directly, by third-party service providers acting for IRONMAN, and by other Anti-Doping Organizations (ADOs) where sharing is necessary under the Code. Processing may occur in WADA’s ADAMS platform and/or systems operated outside ADAMS.

2) Types of Personal Information Processed by the IRONMAN Anti-Doping Program

The types of personal information we collect will depend on your level as an athlete or your role in sport. It will also depend on how the anti-doping rules apply to you.

For example, if you need a therapeutic use exemption, you will need to submit medical information. If you are included in one of IRONMAN’s Testing pools, you will be required to submit daily whereabouts information via WADA’s ADAMS database. If you are charged with an anti-doping rule violation, you may need to provide us with evidence in your defense.

Depending on your role and anti-doping interactions, we may process the following categories:

 Information that identifies or is identifiable to you, like your name, contact information, date of birth, gender, sport nationality, and the sports you participate in.	 Education data we need to make sure you are receiving anti-doping education, like the courses you complete, the dates you took them, and your assessment scores.	
 Whereabouts information that indicates where you can be found for anti-doping testing (for example, addresses for regular activities like training, work or school and for the location(s) where you will be available for testing during a daily one-hour time slot). This information may be submitted as part of your inclusion in a Testing Pool or as a function of your race registration.	 Testing data that is created when we collect samples from you for an anti-doping test. (for example, doping control forms, type of test, sample code numbers, responses and information provided by you during a sample collection session) and the laboratory results from the analysis of your samples.	 Athlete Biological Passport (ABP) data , for example, biological passport ID, blood and steroid biological marker values and ratios, and expert recommendations and assessments. The ABP is another tool to identify doping based on the analysis of laboratory results obtained from anti-doping samples.
 Medical information , if you need to apply for a Therapeutic Use Exemption because you have a medical condition and need to use a substance or a method that is normally not allowed to be used.	 Results management information , if we believe you have broken anti-doping rules. This includes information about the anti-doping rule violation you are charged with, evidence you provide in defense of a charge, and the decision on whether or not you will receive a sanction.	 Investigations information if we suspect you may have broken anti-doping rules. This can include information or evidence obtained from open source searches, from witnesses and other confidential sources, or through cooperation with law enforcement agencies.

3) Purposes for Processing

We process personal information only where relevant and proportionate to and in accordance with the WADA Code, International Standards and the IRONMAN Anti-Doping Rules. This involves using personal information to carry out the following anti-doping activities:

- **Providing Anti-Doping education.**
- **Testing & test distribution planning** (Planning and locating athletes for both In-Competition and Out-of-Competition).
- **Analyzing the results from your biological samples.**

- **Analyzing and following up on** the recommendations and results of your Athlete biological passport.
- **TUE administration** and expert review. IRONMAN has delegated this to the International Testing Agency (ITA).
- **Gathering intelligence and conducting investigations** to better target testing plans and identify anti-doping rule violations, including cooperation with law enforcement. IRONMAN has delegated this aspect of our program to the ITA.
- **Coordinating and collaborating with other ADOs**, for example, by sharing intelligence to better target testing or to collaborate on education initiatives.
- **Results Management** (notifications, hearings, decisions, appeals). IRONMAN has delegated this aspect of our program to the ITA.
- **Sanction monitoring and enforcement** we monitor sanction status of athletes in conjunction with race registrations to ensure that sanctions issued by IRONMAN or other Code Signatories that have authority over you are enforced.
- **Reporting on our anti-doping activities to WADA** to demonstrate our compliance with the Code and International Standards.
- **Statistics and Reporting** we aggregate personal information about the number of anti-doping tests we conduct and anti-doping rule violations for which we are the results management authority .

4) Categories of Organizations That May Receive or Process Data

Where necessary and permitted by applicable law and the Code/ISPPPI, IRONMAN may share your personal information with the following individuals and organizations to run our anti-doping program and respect the Code:

- **Code Signatories** that have testing authority, sample collection authority, or results management authority over you, like a National Anti-Doping Organizations; International Federations; Major Event Organizations
- **WADA** ensures all Code Signatories respect the rules of the Code. WADA also operates and manages ADAMS, a platform hosted in Canada to which we will upload your person information. Using ADAMS facilitates the collaboration and sharing of information needed to run our anti-doping program.

- **WADA Accredited Laboratories and Athlete Passport Management Units (APMU)** that analyze anti-doping samples and the Athlete Biological Passport. They are subject to the International Standard for Laboratories and only have access to coded data (sample codes or passport IDs)
- **Delegated third parties and other service providers** that we contract to carry out anti-doping activities and maintain our operations. Ex.) IRONMAN has delegated Results management authority, I&I, the processing of whereabouts failures and TUE processing to the International Testing Authority (ITA). We also work with third parties such as PWC to serve as sample collection authorities. We require delegated third parties to agree to strict contractual controls designed to protect your personal information.
- **Results Management panels/tribunals**, and **CAS** (as applicable)
- **ADAMS** (WADA's database): certain processing occurs within ADAMS; WADA is responsible for ADAMS records and controls, while ADOs remain responsible for lawfully entering, sharing, and accessing data. For details about ADAMS, associated mobile apps like Athlete Central, and how WADA will process your personal information, review the ADAMS Privacy Policy (<https://adams-help.wada-ama.org/hc/en-us/articles/360012071820-ADAMS-Privacy-Policy>) or contact WADA at privacy@wada-ama.org.

5) Possibilities & Circumstances of Public Disclosure

In line with the Code and applicable laws, IRONMAN may **Publicly Disclose** certain information (e.g., **test results** and **tribunal decisions**) when a case outcome requires or allows publication (such as an ADRV decision, sanction, or status), taking into account timing, fairness, and any legal restrictions. Public disclosure is limited to what is necessary and permitted within the WADA Code and International Standards.

6) Rights of Participants

You have rights with respect to your personal information under the **International Standard for the Protection of Privacy and Personal Information**, including the right to a copy of your personal information and to have it corrected, blocked or deleted in certain circumstances. You also have the right to lodge a complaint with us. Depending on your geographic location,

you may have additional rights under applicable data protection laws in your country or jurisdiction. For more details on these rights, please refer to the IRONMAN Group's privacy policies- [Online Privacy Policy | IRONMAN](#).

Because anti-doping is a mandatory feature of organized sport, it still may be necessary for IRONMAN, WADA, and other ADOs and organizations to continue to process your personal information to fulfill obligations under the Code, the International Standards, or national anti-doping or sport laws despite your objection to such processing or withdrawal of consent (where applicable). This includes processing for investigations or proceedings related to possible ADRVs, as well as processing to establish, exercise or defend against legal claims involving you, WADA and/or an ADO.

Refusal to participate in Doping Controls, including Testing, or refusal to consent to or withdrawing consent to the necessary processing of personal information may prevent continued involvement in organized sport, may constitute a Code violation for Athletes, and may lead to disqualification of Competition results, sanctions, loss of prize money or loss of eligibility. (e.g., under Article 2.3 of the Code – Evasion, Refusal or Failure to Submit to Sample Collection). Where IRONMAN processes the personal information of a Participant on the basis of their consent, regardless of any refusal to grant or subsequent withdrawal of consent by the Participant, IRONMAN still may be required to process their personal information where necessary to enable it to:

- a) Commence or pursue analyses or investigations involving suspected anti-doping rule violations relating to the Participant;
- b) Conduct or participate in proceedings involving suspected anti-doping rule violations relating to the Participant; or
- c) Establish, exercise or defend against legal claims relating to IRONMAN and/or the Participant

7) Safeguards and Retention

We have adopted measures, including administrative, technical, physical and contractual measures, to protect personal information in our custody and control against theft, loss and unauthorized access, use, modification or disclosure.

We restrict access to personal information on a need-to-know basis to employees and authorized delegated third parties and service providers who require access to fulfill their designated functions. The anti-doping organizations we share personal information with

are bound by the same standards as us when they handle your personal information. These standards are described in the **International Standard for the Protection of Privacy and Personal Information**. They include protecting your personal information, deleting it when no longer needed, being transparent, and allowing you to exercise rights like the right to access your personal information.

Your personal information will be kept in accordance with the criteria and retention periods set out in **Annex A of the ISPPPI**. Retention periods in Annex A can be extended where required by law or for the purpose of conducting an anti-doping investigation or proceeding.

Contact Us

If you have any questions about how we handle personal information, or have any complaints, please contact us at iamtrue@ironman.com. Depending on your geographic location, you may also have the right to file a complaint with the relevant Data Protection Authority in your country or jurisdiction. For more details on jurisdiction-specific rights, please refer to the IRONMAN Group's privacy policies: [Online Privacy Policy | IRONMAN](#).

If you are not satisfied with how we have handled your complaint, you may notify WADA at compliance@wada-ama.org or privacy@wada-ama.org. WADA will handle the notice in accordance with the International Standard for Code Compliance by Signatories.