

Injection Declaration Form - Information Notice

This Information Notice complements the information notice on the processing of personal data of participants and other accredited persons for the Summer Youth Olympic Games Dakar 2026 ("Summer Youth Olympic Games Dakar 2026" or the "Games") that is provided as part of their accreditation. This Information Notice applies to the athletes participating in the Games (the "Athletes") and to individuals who administer any injection to Athletes pursuant to the IOC Needle Policy (hereinafter "Practitioners") and contains important information about the personal data processing carried out in relation to this Injection Declaration Form related to the Games, including information concerning:

1. **Information collected about the Athlete and the Practitioner**
2. **Entities involved in the process**
3. **Use of the information collected**
4. **Rights of the Athlete and the Practitioner**
5. **Contacts**

Please read this Information Notice carefully and make sure you understand what it says.

1. Information collected about the Athlete and the Practitioner

In accordance with the IOC Needle Policy & Rules for the **Summer Youth Olympic Games Dakar 2026** (respectively the "**Needle Policy**" and the "**Games**"), information shall be collected whenever an Athlete receives an injection during the period of the Games through the Injection Declaration Form to which this Information Notice is attached. The information requested in the Injection Declaration Form is mandatory as it is necessary for the implementation of the Needle Policy. Failure to provide this information may result in disciplinary measures and/or sanctions in application of Rule 59 of the Olympic Charter.

Information collected and otherwise processed in connection with the Needle Policy (the "**Needle Form Personal Data**"), includes the following:

- **Athletes' personal data**:
  - Personal data related to their identity (name, date of birth, gender, National Olympic Committee membership and sport, accreditation ID);
  - Medical information, including clinical history and diagnosis as well as information related to the injection (such as substance(s) injected, date and place of injection, dosage, route of administration, date of next competition).
- **Practitioners' personal data**:
  - Personal data related to their identity (name, mobile number and email address, specialty/title, country of practice license, residential location during the Games, accreditation ID if applicable).

Athletes and Practitioners are hereinafter jointly defined as "**Data Subjects**".

Needle Form Personal Data may constitute, when they concern health data, "sensitive personal data" or "special categories of personal data" as such terms are defined under the applicable data protection laws.

2. Entities involved in the process

The Needle Policy is managed and implemented under the responsibility of the International Olympic Committee (the "**IOC**"), in accordance with the Needle Policy. The IOC, located at Maison Olympique, 1007 Lausanne, Switzerland, will process Needle Form Personal Data collected via the Injection Declaration Form as a data controller. The Dakar 2026 Youth Olympic Games Organising Committee, located at Residence Eden Roc, 26-28 Boulevard Roosevelt, Dakar, Senegal, acts as the IOC's representative in the Senegalese territory.

3. Use of the information collected

a) <u>Purposes of processing Needle Form Personal Data and legal basis for processing</u>

Needle Form Personal Data will be processed by the IOC for the following purposes:

i. **Ensuring compliance with the Needle Policy**,
ii. **Ensuring the integrity of the competitions at the Games**,
iii. **Carrying out doping controls** and **ensuring the compliance with the IOC Anti-Doping Rules applicable to the Games** (the "**Rules**"). Doping controls on the occasion of the Games are carried out under the responsibility of the IOC acting as an Anti-Doping Organisation, in accordance with the Rules and the World Anti-Doping Code, including the related international standards (the "**Code**"),
iv. **Investigating and prosecuting breaches of the Needle Policy, the Olympic Charter, the Rules and the Code** or for otherwise establishing, exercising or defending legal rights or complying with legal obligations related thereto.

(collectively referred to as the "**Authorised Purposes**").

For the Athletes, each of the above purposes of processing Needle Form Personal Data is based on the necessity to perform the contract between the IOC and the Athletes governing the conditions of their participation in the Games (such as the Conditions of Participation) including their commitments to comply with the provisions applicable to them (including the Needle Policy, the Olympic Charter, the Rules and the Code as referred to in the Conditions of Participation form). The processing of Athletes' medical information is justified by reasons of substantial public interest, to guarantee doping-free sports competitions and to protect the

clean Athletes, according to the provisions of the Code, as recognized globally and signed by National Olympic Committees and National Anti-Doping Organizations. The processing of Athletes' personal data, including special categories of personal data such as health data is also necessary for the establishment, exercise or defense of legal claims involving the Athletes.

For the Practitioners, the processing of their personal data for each of the above Authorised Purposes is based on the IOC's legitimate interests to ensure that Practitioners comply with their commitments pursuant to the Needle Policy and the rules applicable to the Games, the necessity to perform the contract between the IOC and the Practitioners, and/or the necessity for the IOC to comply with legal obligations to which it is subject in connection with the Games.

b) Data recipients and international transfer

The IOC may disclose personal data to the following entities, only where necessary for the Authorised Purposes:

- **IOC Health, Medicine and Science Department** to initiate and investigate any potential violation of the Needle Policy;
- the World Anti-Doping Agency ("**WADA**") to monitor the implementation of the Code, if required to fulfil any Code-purpose (for instance, in case of an investigation (under WADA's purview) or an anti-doping rule violation). The IOC will use the ADAMS data-management system developed by WADA to process and manage doping controls related information ("**ADAMS**"). For more information on ADAMS, consult the WADA website at www.wada-ama.org and the ADAMS Privacy Policy (ADAMS Privacy Policy);
- the Organising Committee for the Olympic Games Dakar 2026 to assist the IOC in order to ensure integrity of the competitions at the Games;
- the International Testing Agency ("**ITA")** to which the IOC has entrusted the management of its anti-doping program for the Games. The ITA will thus manage the Games' anti-doping activities on behalf of the IOC, acting as a data processor. This includes for instance testing activities, intelligence gathering and investigations, prosecution of anti-doping rule violations, therapeutic use exemptions, results management activities, amongst others;
- the Court of Arbitration for Sport ("**CAS"**) in case of an investigation or a potential anti-doping rule violation and a case is filed with CAS for decision;
- **technology service providers, acting as data processors,** which provide services on behalf of the IOC and that are necessary to implement the Needle Policy, including in particular the online Injection Declaration Form provided by Microsoft Forms.

In accordance with the Rules and the Code, Needle Form Personal Data may also be shared with other authorised recipients, such as designated national anti-doping organisations, National Olympic Committees, International Federations, and law enforcement authorities.

The complete and updated list of the data processors and authorized recipients is available upon request to the contact details indicated in section 5 of this Information Notice.

Needle Form Personal Data will be processed mainly in Switzerland, in Senegal or in Canada. In case of transfer of Needle Form Personal Data to countries not providing an adequate level of data protection, the IOC will comply with applicable laws and regulations, and ensure that the recipients of Needle Form Personal Data maintain appropriate safeguards and provide an adequate level of data protection (such as via the implementation of standard contractual clauses, as approved by the competent supervisory authority). Such transfers may also rely on derogations under article 49 of the EU General Data Protection Regulation 2016/679 and/or article 17 of the Swiss Federal Act on Data Protection and/or the Senegalese Law n°2008-12 of January 25, 2008 Concerning Personal Data Protection.

c) Public disclosure

Personal data will normally be processed in a confidential manner. Information relating to an alleged or established anti-doping rule violation may be disclosed only where required or permitted under the Code, the Rules and applicable laws, subject to the safeguards and limitations provided by the Code, the Rules and applicable laws, including specific protections for minors and other protected persons. Personal data may also be disclosed to third parties in any event where such disclosure (a) is required by law, regulation or compulsory legal process; (b) takes place with the informed, express and written consent of the Athlete or other person; or (c) is necessary to assist law enforcement or governmental or other authorities in the detection, investigation or prosecution of a criminal offence or breach of the Code, provided that such data is reasonably relevant to the offence in question and cannot otherwise reasonably be obtained by the authorities.

d) Data retention period

As a general rule, Needle Form Personal Data may be retained by the IOC for a period of up to 1 year. Personal data relating to doping controls will be retained in accordance with Annex A of the WADA International Standard for the Protection of Privacy and Personal Information, which forms part of the Code. Retention periods can be extended or modified where required by law (for the period expressly required by the law) or in case an investigation or proceeding is conducted (in such case the Needle Form Personal Data will be retained for the duration of the investigation or proceeding, and for as long as is required by the applicable statute of limitations).

At the end of the retention period, Needle Form Personal Data will be deleted or anonymized.

e) Data processing methods and information security measures

Needle Form Personal Data will be processed for the Authorised Purposes above through paper and electronic means. The IOC will use technical and organisational measures to protect the security, confidentiality, integrity, availability and traceability of Needle Form Personal Data against the risks of damage, destruction, loss or unauthorised access, in accordance with the applicable laws.

The IOC acknowledges the sensitive nature of the medical information and records included and/or referred to in the Injection Declaration Forms, which are protected by medical secrecy and data protection laws. Therefore, it has put in place measures necessary to safeguard the confidentiality of such information in accordance with applicable laws. This includes providing secure facilities, software and web-based systems to their physicians and their authorized personnel.

Only authorized physicians, personnel and experts, bound by medical secrecy and/or professional secrecy and/or strict confidentiality provisions, may have access to the medical information and records included and/or referred to in the Injection Declaration Form, strictly limited to what is necessary for achieving the above-mentioned purposes.

4. Rights of the Data Subjects

4.1 Subject to statutory restrictions under applicable laws, the Data Subjects can exercise, free of charge and at any given time, certain rights regarding their data, including the right to:

a) obtain confirmation of the existence of Needle Form Personal Data relating to them and, where that is the case, the right to access to and receive a copy of them as well as the right to obtain more information on the processing;
b) know the origin of the data, the purposes of the processing and its methods, as well as the logic applied to the processing carried out by electronic means;
c) verify the accuracy of Needle Form Personal Data and request its integration, update or amendment;
d) withdraw the previously given consents, if any;
e) request to limit the processing of the Needle Form Personal Data where (i) the Data Subjects contest the accuracy of the personal data until the IOC has taken sufficient steps to correct or verify its accuracy; (ii) the processing is unlawful but the Data Subjects do not want the IOC to erase the Needle Form Personal Data; (iii) the IOC no longer needs the Needle Form Personal Data for the purposes of the processing, but the Data Subjects require them for the establishment, exercise or defense of rights; or (iv) the Data Subjects have objected to processing if any, pending verification as to whether the IOC has compelling legitimate interests to continue the processing;
f) subject to compliance with the strict conditions attached to this right, object to the processing of the Needle Form Personal Data, if any, for reasons relating to their particular situation;
g) request the erasure of the Needle Form Personal Data without undue delay in certain specific cases;
h) obtain the Needle Form Personal Data portability subject to compliance with the conditions governing this right.

The IOC has designated an individual in charge of receiving Data Subjects' rights requests, complaints or questions in relation to their processing of the Needle Form Personal Data, who can be contacted at the following address: **dataprotectionofficer@olympic.org** .

In cases where the Swiss Federal Act on Data Protection applies, you may submit a complaint to the Swiss Federal Data Protection and Information Commissioner, Feldeggweg 1, CH – 3003 Bern, Switzerland, https://www.edoeb.admin.ch. Where permitted under other applicable laws, including where the GDPR applies — you also have the right to lodge a complaint with the supervisory authority of your country of residence, your place of work, or the place of the alleged infringement.

5. Contacts

For any questions related to personal data processing, the Data Subjects can contact the IOC at **dataprotectionofficer@olympic.org**.

If, under the laws of your country of residence, you are a minor or otherwise under 18 years old when you receive this Information Notice and do not understand any part of it, you may ask a parent, legal guardian, NOC representative, or another trusted adult to help explain it to you. You may also contact the IOC using the address provided above.