

Extracted from [2021 International Standard for the Protection of Privacy and Personal Information](#)

ANNEX A: RETENTION TIMES

ADRV: *Anti-doping rule violation*
 AAF: *Adverse analytical finding*
 ATF: *Atypical finding*
 APF: *Adverse passport finding*
 ATPF: *Atypical passport 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. Retention times are limited to two categories: 12 months and 10 years. The period of ten years represents the time period during which an action may be commenced for an anti-doping violation under the World Anti-Doping Code. The period of 12 months represents the time period relevant to count three whereabouts failures giving rise to an anti-doping rule violation, and is also applied to certain incomplete documentation and *TUE*-related information.
- III. Retention times can be extended in case of pending or reasonably anticipated anti-doping rule violations, investigations, or other legal proceedings.

Module	Data	Retention Periods	Remarks	Criteria
1 – Athlete		As of time when <i>Athlete</i> is excluded from ADO's <i>Testing</i> program:	<i>Athlete</i> data relevant for practical purposes and for notification purposes in the event of an ADRV. These data are not particularly sensitive.	
<i>Athlete</i> (general)	Name	Indefinitely	This data can be retained indefinitely. ADOs should be allowed to keep a record of <i>Athletes</i> that have been part of their <i>Testing</i> program. For elite <i>Athletes</i> , this information is public information anyway.	Proportionality/Necessity
	Date of birth	Indefinitely		Proportionality/Necessity
	Sport Discipline	Indefinitely		Proportionality/Necessity
	Gender	Indefinitely		Proportionality/Necessity
	Phone Number (s)	10 yrs	10 years because of possible ADRV.	Necessity
	Email address	10 yrs	Same as above.	Necessity
	Mailing address	10 yrs	Same as above.	Necessity

Module	Data	Retention Periods	Remarks	Criteria
2 – Whereabouts* *(except for city, country, and <i>In- Competition</i> whereabouts information, which are needed for the <i>Athlete Biological Passport</i> - see section 8) Whereabouts	Whereabouts (other than city, country and <i>In-Competition</i> whereabouts)	12 months as of end of the whereabouts quarter for which the data was submitted	Relevant to count three whereabouts failures in 12 months' time.	Necessity
	Whereabouts failures (filing failures and missed tests)	10 years as of date of whereabouts failure	Relevant to count three whereabouts failures in 12 months' time and to other possible ADRVs. If ADRV, will also be kept as part of disciplinary file indefinitely (see section 7).	Necessity
3 – TUEs TUE	<i>TUE</i> certificates and rejected <i>TUE</i> decision forms	10 yrs as of certificate date/date of rejection decision	Destroying medical information makes it impossible for WADA/ADOs to review TUEs retrospectively after TUE has lost its validity. TUE information is largely medical and therefore sensitive. Can be relevant in case of re- <i>Testing</i> or other investigations.	Proportionality/ Necessity
	<i>TUE</i> application forms and supp. med information and any other <i>TUE</i> info not otherwise expressly mentioned herein.	12 months from end of validity of <i>TUE</i>	Loses relevance after expiration of <i>TUE</i> except in case of re-application.	Proportionality/Necessity
	Incomplete <i>TUEs</i>	12 months from date of creation	Can be relevant in case of re-application.	Proportionality

Module	Data	Retention Periods	Remarks	Criteria
4 – Testing <i>Testing</i>	<i>Doping Control Forms (DCFs)</i>	10 yrs as of <i>Sample</i> collection date	DCFs, associated mission/testing orders, and chain of custody documents are relevant for <i>Athlete Biological Passport</i> and in case of re- <i>Testing of Samples</i> .	Proportionality/Necessity
	Mission/testing orders	Retained until all associated DCFs have been deleted	See above.	Proportionality/Necessity
	Chain of custody	10 yrs as of document creation date	See above.	Proportionality/Necessity
	Incomplete <i>Testing</i> documentation or documentation not matched to a <i>Sample</i>	12 months as of document creation date	Documentation that is incomplete or not matched to a <i>Sample</i> typically results from a data entry error and is discarded after a short delay for data integrity purposes.	Proportionality
5 – Samples (lab) <i>Samples</i>	<i>A and B Sample</i>	Indefinitely / 10 yrs	Managed by Laboratory Subject to the criteria and requirements of the <i>Code/International Standards</i> , <i>Samples</i> may in certain circumstances be retained indefinitely for scientific purposes. In case of an AAF or other ADRV, and if the <i>Sample</i> is identifiable, 10 yrs should be the maximum retention time.	Proportionality
6 – Test results/Results Management (forms/documentation)	AAF	10 yrs	Relevant because of multiple violations and retrospective analysis. Necessary because of multiple violations.	Necessity
	ATF	10 yrs	Same as above.	Necessity

Module	Data	Retention Periods	Remarks	Criteria
7 – Disciplinary Proceedings and Decisions (ADRV)			Relevant because of multiple violations. Managed by disciplinary body / sports federation / ADO.	
Disciplinary decisions and proceedings	Sanctions under the Code	Indefinitely	Should be kept indefinitely for legal and precedential value.	Proportionality/Necessity
	Decisions	Indefinitely	Same as above.	Proportionality/Necessity
	Relevant proceedings documentation/files (incl. case files, laboratory and ABP documentation packages, etc.)	Indefinitely	Same as above.	Proportionality/Necessity
8 – Athlete Biological Passport				
Results	Biological variables, ATPF, APF, APMU reports, expert reviews and other supporting documentation.	10 yrs as of date of match between results and Doping Control Form	Necessary because of multiple violations and to analyze or review biological variables, APMU reports and expert reviews over time.	Necessity
Whereabouts	Whereabouts (only city, country an <i>In-Competition</i> whereabouts)	10 yrs as of end of the whereabouts quarter for which the data was submitted	Needed to support atypical/abnormal results, or to refute Athletes' claims.	Proportionality/Necessity