



# **PLY REGISTRATION**

## **PRIVACY POLICY**

**1 FEBRUARY 2022**

# INTRODUCTION

In this privacy policy (the "**Privacy Policy**") references to "IPC", "we" and "us" are to the International Paralympic Committee, the global governing body of the Paralympic Movement.

This Privacy Policy, as updated from time to time, explains what personal data we collect from you and in what form we process it. Furthermore, you will receive an overview of the rights you are entitled to according to applicable data protection laws. In addition, should you have any questions, we will provide you with a contact person.

Your personal data will be collected and processed in accordance with this Privacy Policy. **We recommend that you read this privacy policy in its entirety.**

## 1 WHAT PERSONAL DATA DO WE PROCESS?

Personal data is information that relates to an identified or identifiable natural person (such as yourself). The processing of personal data in this context encompasses activities such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

In order to enable you to register for the post-nominal letters PLY (the "**post-nominal letters**"), we need to process certain personal data about you. In addition, to verify and authenticate your registration we may also need to process personal data about you that we already hold in the IPC's Sport Data Management System (**SDMS**) database, to the extent we hold such personal data. This is described in detail further below.

When you register for the post-nominal letters, we process the following personal data (together, the "**Core Data**"):

- Given name
- Family name
- Gender
- Date of birth
- National Paralympic Committee
- Phone number
- Email address
- Paralympic Games in which you competed
- Sport in which you competed

- Medal event in which you competed

In addition, for the purpose of verifying and authenticating your registration, your given name, family name, gender and date of birth may be cross-referenced against the SDMS. The SDMS stores athletes' medical information where it has been provided (with the athlete's consent) by the athlete and/or their National Paralympic Committee / National Federation (the "**Medical Data**"). Consequently, in verifying and authenticating your registration, your given name, family name, gender and date of birth may be cross-checked against any Medical Data held about you in the SDMS.

The Medical Data constitutes "data concerning health", which, pursuant to Article 9 of the EU General Data Protection Regulation (**GDPR**), is a special category of personal data that may not be processed unless certain exceptions apply (as discussed further below).

For the avoidance of doubt, the other special categories of personal data (as detailed in Article 9(1) of the GDPR) - such as (for example) racial or ethnic origin, religious or philosophical beliefs - are not collected or processed by us when you register for the post-nominal letters.

## **2 WHY DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS?**

### **2.1 REGISTRATION**

As described above, we process the Core Data and Medical Data to facilitate, verify and authenticate your registration for the post-nominal letters.

In relation to the registration:

- The legal basis for the processing of your Core Data is Article 6(1)(b) of the GDPR. By agreeing to this Privacy Policy, you agree that the IPC may process your Core Data to facilitate your registration.
  - If you are eligible for registration, you and the IPC enter into a contract, the purpose of which is to grant you the right to use the post nominal letters alongside your name - whether on social media platforms, business cards, presentations, email signatures, CVs or otherwise - subject to your compliance with the PLY Code of Conduct.
  - If it is unclear whether you are eligible for registration, your Core Data may be used in order to communicate with you to obtain further

information to help us ascertain whether you are in fact eligible for registration.

- If you are not eligible for registration, your Core Data will be deleted or destroyed within one month of such determination being made. We will not use your Core Data for any other purpose than to facilitate your registration.
  
- The legal basis for the processing of your Medical Data is Article 6(1)(a) of the GDPR. By agreeing to the terms of this Privacy Policy, you explicitly provide your consent for your Medical Data (to the extent that it is held by the IPC in the SDMS) to be processed for the sole purpose of your registration for the post-nominal letters. The provision of your explicit consent also operates (pursuant to Article 9(2)(a) of the GDPR) as the exception to the general prohibition on processing special categories of personal data (which includes your Medical Data) under Article 9(1) of the GDPR.

## **2.2 COMMUNICATION WITH ATHLETES**

If you have confirmed that you would like to receive information, news and opportunities from the IPC, we will also process your Core Data for the purpose of communicating with you in this regard. For the avoidance of doubt, we will not process your Medical Data for this purpose.

The legal basis for the processing of this Core Data is Article 6(1)(a) of the GDPR, i.e. your consent. You are entitled to withdraw your consent at any time without giving reason, in which case the IPC shall not be entitled to any further use of your Core Data for this purpose. However, the withdrawal of consent does not affect the legality of processing up to the withdrawal.

The information, news and opportunities referenced above may relate to:

- newsletters published by the IPC and/or the IPC Athlete's Council;
- newsletters published by the IPC's Worldwide Paralympic Partners and/or other official partners / sponsors of the IPC (the "**IPC Partners**");
- announcements from the IPC, the IPC Athlete's Council and/or IPC Partners;
- programmes for current and former athletes run by the IPC and/or the IPC Athlete's Council;
- any other institutional (i.e. IPC / IPC Athlete's Council) athlete-related communications; and
- any other athlete-related communications from IPC Partners, including activations, call for applications, etc.

## **2.3 LEGAL REQUIREMENTS**

The IPC is subject to a wide variety of legal requirements. We will process your personal data where this is required to comply with our legal obligations. The legal basis for the processing of your personal data for this purpose is Article 6(1)(c) of the GDPR.

# **3 WHERE DO WE TRANSMIT YOUR PERSONAL DATA AND WHY?**

## **3.1 USE OF PERSONAL DATA WITHIN THE IPC**

Within the IPC, only those entities that need your personal data in order to fulfil our contractual and/or legal obligations, or to protect our legitimate interests, will have access to them.

## **3.2 USE OF PERSONAL DATA OUTSIDE THE IPC**

We respect the protection of your personal data and we pass on your personal data only if required by law, to fulfil our contractual obligations or if you have given your consent.

For the following recipients, for example, there is a legal obligation to pass on your personal data:

- Public authorities and supervisory authorities, e.g. tax authorities, customs authorities;
- Judicial and law enforcement authorities, e.g. police, courts, public prosecutors;
- Lawyers and notaries, e.g. in legal disputes;
- Chartered accounts and auditors.

For the avoidance of doubt, under no circumstances will we sell your personal data to third parties.

# **4 ARE YOU OBLIGED TO PROVIDE US WITH YOUR PERSONAL DATA?**

In the context of your registration for the post-nominal letters, we require from you your Core Data and any other data that we are legally obliged to collect. Without this data it is not possible for us to facilitate your registration.

## **5 DELETION PERIODS**

In accordance with the applicable data protection regulations, we do not store your personal data longer than we need for the purposes of the respective processing described above. If the personal data is no longer required for the fulfilment of our contractual or legal obligations, it will be regularly deleted by us, unless temporary storage is still necessary.

Reasons for further storage would include:

- Obligations under commercial and tax law to retain data must be observed. The periods for storage, primarily in accordance with the provisions of the German Commercial Code and the Fiscal Code, are up to 10 years.
- To obtain evidence in the event of legal disputes within the framework of statutory limitation periods. In civil law, statutory limitation periods may be up to 30 years, with the regular limitation period occurring after three years.

## **6 YOUR RIGHTS AS A DATA SUBJECT**

Within the scope of processing your personal data, you also have certain rights. More detailed information can be found in the corresponding provisions of the GDPR (Articles 15 - 21).

### **6.1 RIGHT TO ACCESS AND CORRECTION**

You have the right to obtain information from us on the personal data of yours that we process. If this information is not or no longer correct, you can ask us to correct the data, or, if it is incomplete, to complete it.

### **6.2 RIGHT TO DELETION**

You can request the immediate deletion of your personal data under the following circumstances:

- When your personal information is no longer needed for the purposes for which it was collected;
- If you have revoked your consent and there is no other legal basis for data processing;
- If you object to the processing and there are no overriding legitimate reasons for data processing;
- If your data is processed unlawfully; and

- If your personal data must be deleted in order to comply with legal obligations.

Please note that before deleting your data we must check whether there is not a legitimate reason for processing your personal data.

### **6.3 RIGHT TO RESTRICTION OF PROCESSING**

You may request us to restrict the processing of your personal data for one of the following reasons:

- If you dispute the accuracy of the data until we have had the opportunity to verify the accuracy of the data;
- If the data is processed unlawfully, but instead of being deleted, you merely request the restriction of the use of personal data;
- If we no longer need the personal data for the purposes of processing, but you still need them to assert, exercise or defend in the course of legal claims; and
- If you have filed an objection against the processing and it is not yet clear whether your legitimate interests outweigh ours.

### **6.4 RIGHT TO OBJECT TO PROCESSING**

#### *Right to object in individual cases*

If the processing is carried out in the public interest or on the basis of a balance of interests (legitimate interest), you have the right to object to the processing for reasons arising from your particular situation. In the event of an objection, we will not process your personal data further, unless we can prove compelling reasons for processing your data, which outweigh your interests, rights and freedoms, or because your personal data serve to assert, exercise or defend legal claims. The objection shall not preclude the legality of the processing carried out up to the time of the objection.

#### *Right to object against the use of data for advertising purposes*

In cases where your personal information is used for advertising purposes, you can object to this form of processing at any time. We will no longer process your personal information for these purposes.

The objection can be made form-free and should be addressed to:

International Paralympic Committee  
Adenauerallee 212-214  
53113 Bonn, Germany

Email: [privacy@paralympic.org](mailto:privacy@paralympic.org)

Phone: +49-228-2097-200

Fax: +49-228-2097-209

## **6.5 RIGHT TO DATA PORTABILITY**

Upon request, you have the right to receive personal data that you have given us for processing in a transferable and machine-readable format.

## **6.6 RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY (ART. 77 GDPR)**

We try to process your requests and claims as quickly as possible in order to protect your rights appropriately. Depending on the frequency of enquiries, however, it may take up to 30 days before we can provide you with further information about your request. If it should take longer, we will inform you promptly of the reasons for the delay and discuss the further process with you.

In some cases, we may not or cannot give you any information. If legally permissible, we will inform you of the reason for refusing to disclose the information.

However, should you not be satisfied with our answer and responses or should you be of the opinion that we are violating the current data protection law, you are free to file a complaint with our Data Protection Officer as well as the relevant supervisory authority. The supervisory authority responsible for us is:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (LDI)

Kavalleriestrasse 2-4

40213 Düsseldorf, Germany

Phone: +49 211 38424-0

Fax: +49 211 38424-10



## **7 QUERIES**

We take all measures required by applicable data protection laws to ensure the protection of your personal data.

If you have any questions regarding this Privacy Policy, please contact our Data Protection Officer.

Clemens Dorner  
2B Advice GmbH  
Joseph Schumpeter Allee 25  
53227 Bonn, Germany  
Email: [ipc@2b-advice.com](mailto:ipc@2b-advice.com)  
Phone: +49 (228) 926165 120