

[INFORMATION NOTICE – DATA PROTECTION – HEALTH PROTOCOL](#)

Information regarding the personal data collected and processed as part of the procedures to be followed for the resumption of the cycling season in the context of the coronavirus pandemic

The purpose of this document is to provide the teams, including riders and staff, with complete information with regard to the collection and processing of personal data as part of the procedures to be followed for the resumption of the cycling season in the context of the coronavirus pandemic. The teams involved have access to and can consult this document at any time during the season. For questions or concerns regarding the collection and processing, the teams can contact the UCI Data Protection Officer at the following address: data.protection@uci.ch.

I. THE CONTEXT

The global COVID-19 pandemic significantly impacts the conditions for the organization of cycling competitions around the world. In order to organise events that bring together a large number of people the UCI has put in place and published a health protocol with a large set of measures to be followed by the various stakeholders involved. These include diagnostic tests for SARS-CoV-2 which must be carried out under specific conditions depending on the class of the race. These tests are the responsibility of the teams and are compulsory for riders' participation in the relevant event.

Within this framework, the UCI has set up a secure database in order to gather the test results submitted by the teams and enabling the UCI to enforce the health protocol. This database is hosted, updated and used in total compliance with the applicable data protection laws and regulation, notably the GDPR (General Data Protection Regulation) which enshrines the most protective provisions on the matter.

The following information is provided to the teams, including riders and staff members, in accordance with the principle of transparency with regard to the collection and processing of the personal data via the dedicated UCI database.

II. DATA CONTROLLER

Within the scope of its activities of governance, promotion and administration of cycling and in the context set out above the UCI collects and processes a certain amount of personal data.

By determining the purposes and means with regard to the processing of the personal data collected on the database in the context of the health protocol and testing requirements, the UCI assumes the responsibilities and obligations as controller of these data (data controller). The UCI's headquarters is at Allée Ferdi Kübler 12, 1860 Aigle, and it can be contacted by email at: data.protection@uci.ch on all matters related to such processing and collection.

III. DATA COLLECTED

For clarity purposes, the term "personal data", refers to information relating to an identified or identifiable individual, including sensitive personal data.

In the context above-mentioned, the UCI collects and processes personal data of riders and staff members related to the required viral diagnostic COVID-19 tests. In compliance with the relevant laws and regulations, the personal data collected and processed via the database are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. These data comprise identification information relating to the team members as well as the results of their diagnostic tests for SARS-CoV-2. In

accordance with the principle of data minimisation, the personal data collected in the database are adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed.

These data include a special category of personal data concerning health. Such sensitive personal data is treated by the qualified persons with extra security and in accordance with a specific set of rules in addition to the general provisions applicable to all personal data collected and processed. In this respect, the organisational and technical measures put in place by the UCI in order to maintain the integrity of the personal data concerned are described later in this document.

IV. PURPOSE OF THE COLLECTION AND PROCESSING

The personal data are collected under the health protocol, for a specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with this purpose. In the current context marked by the global COVID-19 pandemic, these collections and processing of personal data are carried out in the course of its legitimate activities with appropriate safeguards by the UCI and deemed necessary for reasons of public interest in the area of public health.

Indeed, mandatory viral diagnostic tests are put in place to ensure to the greatest possible extent the safety of athletes racing in events and of all people involved in these events. The collection and processing of the personal data related to the results of those tests within the UCI database created for that purpose allows for constant verification regarding the compliance of the related requirements by teams, thus protecting the safety and health of all the stakeholders involved in the events.

V. SAFETY TECHNICAL AND ORGANISATIONAL MEASURES

In order to pursue the legitimate purpose described above, the personal data related to the results of the viral diagnostic tests carried out in compliance with the health protocol are collected and processed in a secure database hosted on a dedicated cloud platform with appropriate safeguards and under the responsibility of the UCI as data controller.

Access to the database and the personal data is secured by a username and password. In accordance with the applicable laws and regulations and the specific provisions with regard to the collection and processing of personal data concerning health, the personal data are processed by or under the responsibility of the UCI Medical Director. Any other person who may need to access the database and the personal data for specific reasons and under the responsibility of the UCI Medical Director, will be subject to an obligation of secrecy in order to ensure the confidentiality of the personal data.

Other technical and organisational measures are used to ensure appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. The UCI Data Protection Officer is in charge of ensuring a constant compliance with these measures put in place within the UCI.

Appropriate technical and organisational measures are also established to avoid possible data breaches. However and despite these safeguards, in case the personal data for which the UCI is responsible suffers a security incident resulting in a breach of confidentiality, availability or integrity, the UCI shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data

breach to a competent supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights of the team members concerned. Team members may also notify to the UCI a data breach they are aware of concerning the personal data collected and processed in the database in accordance with the health protocol. The notification shall be sent at the following address: data.protection@uci.ch. Whenever possible, information regarding the nature of the personal data breach, the data involved and the likely consequences are to be provided within the notification.

VI. DURATION OF RETENTION OF DATA

The UCI retains the personal data within the secure database for no longer than is necessary for the above-mentioned purpose for which the personal data are processed. The technical and organisational measures required by the applicable laws and regulations remain in place as long as the personal data are kept in a form which permits identification of data subjects, thus ensuring their integrity and confidentiality during all the process. For clarity purposes, in no case, the personal data, will be retained in the database beyond the period of application of the protocol.

VII. RIGHTS

The team members concerned by the collection and processing of their personal data have certain rights by virtue of the applicable laws and regulations on data protection.

These rights include:

- The right of access: the team member concerned has the right to know what data the UCI holds about him or her and to request, in writing, to consult this data. The UCI shall provide this information as quickly as possible and at the latest within a month, provided that the request is not complex.
- The right to information: the team member concerned has the right to be informed of the manner in which his/her data are used.
- The right to object to the processing: the team member concerned also has the right to object to the processing of data when the UCI is using data on the basis of its legitimate interest (without prejudice to the UCI applying measures according to applicable regulations).
- The right of deletion: in certain cases, and if the applicable law so provides, the team member concerned shall have the right for Data to be deleted.
- The right of correction: if the team member concerned considers that his/her data are inaccurate, this person shall have the right to demand their correction.
- The right to complain: if the team member concerned is not satisfied by the manner in which the UCI processes his/her data, this person shall have the right to contact the competent supervisory authority of his/her country of residence or place of work.

Taking into account the specific context and the need for the UCI to process these personal data, the UCI shall, upon request, weigh the interests between the legitimate purpose pursued and the interests and rights of the team member concerned. If the legitimate purpose prevails over the interests and rights of the team member concerned, the UCI may continue to process the data in question.

In this regard, it should also be specified that, in accordance with the legitimate purpose of safety, above-mentioned, the enforcement of some of the rights listed above will prevent the participation of a team member in an event. It is notably the case for the right to object to the processing and the right of deletion.

The UCI also reserves the right to decline a request if it is excessive or disproportionate in respect of the resources required.