

DATA PROTECTION POLICY

Union Cycliste Internationale (UCI)
Chemin de la Mêlée 12
1860 Aigle
Switzerland
data.protection@uci.ch

I. ABOUT THE UCI

The Union Cycliste Internationale (hereinafter **UCI**) is the worldwide governing body for cycling. The UCI's mission is to develop and oversee cycling in all its forms all around the world as a competitive sport, healthy leisure activity, means of transport and source of fun.

It represents, for sporting and public institutions alike, the interests of 194 National Federations, five Continental Confederations, over 1,500 professional riders, over half a million licence-holders, several million cycling enthusiasts and two billion bicycle users all over the world.

The UCI's commitment is to lead the development of cycling as a competitive sport and in all its other forms all around the world. The UCI undertakes to respect the highest standards with regards to all its activities.

II. DATA CONTROLLER

Within the scope of its activities of governance, promotion and administration of cycling, particularly with regards to the management of sporting rankings and results as well as in relation to anti-doping activities and the prevention of the manipulation of competitions, the UCI processes a certain amount of personal data.

The present data protection policy (hereinafter "**Policy**") aims to provide a detailed presentation, by category, of the type of Data collected and processed by the UCI as well as how the UCI uses, shares, protects and stores this Data as well as the rights of all the parties involved.

The term "**Data**" refers to all personal data, namely all information relating to an identified or identifiable individual, including sensitive personal data (hereinafter "**Data**").

The UCI is the controller of the file (data controller) for the Data under this Policy. The UCI's headquarters is at Chemin de la Mêlée 12, 1860 Aigle, and it can be contacted by email at: data.protection@uci.ch.

III. DATA COLLECTED

1. General points

The different categories of Data processed by the UCI are listed below.

The UCI does not intentionally retain any identifiable data concerning children under the age of 16 without the consent of the legal representative.

2. Licence-holders' Data

a. Basic Data

The UCI processes the Data of licence-holders that comprises information such as family name, first name, maiden name, date of birth, nationality, copy of passport, gender, home address, email address, telephone number, social media accounts, banking details, levels and categories, results, rankings, UCI ID, National Federation issuing the licence, licence number and the basic data of health professionals and any other person working with a licence-holder.

The UCI processes Data for the purposes of the administration and governance of cycling, in particular within the framework of the management of sporting rankings and results as well as in connection to its anti-doping activities and the prevention of the manipulation of competitions. The processing of Data is based on the legitimate interest of the UCI to ensure the functioning and transparency of competitions, as well as on the consent of licence-holders in cases in which they are asked. Other justifications may apply in specific cases in which event the licence-holders shall be informed.

b. Data relating to the fight against doping

In addition to basic data, the UCI may also process Data relating to the fight against doping. For further information on the processing of Data relating to the fight against doping, please refer to the Data Protection Policy for Anti-Doping available through the following link: <https://www.uci.org/docs/default-source/anti-doping/antidoping-policy.pdf>

Unless otherwise established in the Data Protection Policy for Anti-Doping, the present Policy also applies.

c. Data relating to para-cycling

Within the scope of para-cycling, the UCI defines functional sport classes and divisions for men and women of all age categories. Licence-holders are classified in the division and the sport class that is appropriate to their functional capacity. The UCI may process the licence-holders' sensitive Data in order to be able to evaluate their functional capacity, classify them in appropriate sport classes and divisions¹ and in this way allow them to participate in para-cycling events.

¹ Classification procedure carried out by UCI Classifiers in application of Part XVI of the UCI Regulations.

Sensitive Data include information such as the licence-holder's impairment; the causes of the impairment; the history and development of the impairment; general health condition; blood group; medical certificates; treatment undertaken; other conditions; identity and contact details of the attending doctor.

d. Medical Data

The UCI Medical Commission and UCI Medical Director process Data in particular within the scope of the regulatory and biological medical monitoring of certain riders (follow-up of implementation only)² and declarations made regarding the injection of substances.³

The UCI processes medical Data on the basis of its legitimate interest in allowing the UCI Medical Commission and UCI Medical Director to ensure that Part XIII of the UCI Regulations is respected, the objective of which is to protect the health of licence-holders.

3. Data of spectators and persons present at UCI events

The UCI also processes Data of spectators and persons present at UCI events. These Data may be collected either directly by the UCI or by the organiser of the UCI event and includes information such as family name, first name, date of birth, nationality, main address, email address and photographs taken during UCI events.

The UCI processes these Data in order to establish a cycle sport community and to conduct the general promotion of the sport. This processing is based on the legitimate interest of the UCI to communicate information relating to the UCI's projects and cycling events. Consent shall be requested when required.

4. Data concerning website users

The processing of Data of UCI website users is governed by the applicable legal information available on the UCI website.

IV. DATA SHARING

1. With UCI subcontractors

The UCI may communicate the basic Data as defined by Article 2, section a. of this Policy to persons and companies that provide it with services as subcontractors, in particular officials taking part in events such as UCI commissaires and classifiers, organisers, timing companies, accreditation management companies, UCI database and server management companies, the company overseeing online entries to certain events and other UCI service providers.

² Solely concerns riders from professional teams competing in Road (WorldTeams, UCI Professional Continental Teams and UCI Women's Teams), Track, Mountain Bike and BMX.

³ According to Article 13.3.052 of the UCI Regulations, the injection of any substance into any part of a rider's body is prohibited except under certain specific conditions. One of these conditions is that the UCI Doctor must be informed immediately in writing not later than 24 hours after the injection (Article 13.3.052, paragraph 5).

Subcontractors of the UCI are subject to an obligation of confidentiality and may only use Data in compliance with UCI instructions and this Policy.

2. With third parties

a. Licence-holders' Data

The UCI may communicate Data to third-party entities such as the International Olympic Committee (IOC), World Anti-Doping Agency (WADA), national anti-doping agencies, the Court of Arbitration for Sport, UCI judicial bodies and national and international authorities competent in relation to the following matters:

- a. any processing operation of Data that is legitimate and proportionate in the context of the administration and governance of cycling.
- b. investigations and/or procedures relating to potential violations of the law or UCI Regulations.

Certain Data may be published by the UCI (e.g. on its website) in the event of the application of a sanction against the person concerned.

When necessary, the UCI communicates Data relating to para-cycling to the International Paralympic Committee (IPC), the IPC's Board of Appeal of Classification (BAC), National Paralympic Committees, National Federations, UCI classifiers and the various UCI departments.

The UCI only communicates medical Data to the UCI Medical Commission and UCI Medical Director. Medical Data are not sent to any third-party person or entity.

b. Data of spectators and persons present at UCI events

Photos and videos taken at UCI events may be published and communicated by the UCI to National Federations, organisers, UCI sponsors and the media who may use these to illustrate events and promote cycling.

Other Data are only communicated with the prior consent of the persons concerned.

Furthermore, the UCI contractually obliges organisers of UCI events to process all Data collected in compliance with local laws and the EU General Data Protection Regulation (GDPR).

V. TRANSFER OF DATA

Data are collected on a global basis, namely potentially from any country that has a National Federation that is a member of the UCI.

Data are mainly processed in Switzerland but may also be processed in other countries if appropriate. The UCI respects the applicable regulations and adopts all necessary measures prior to the communication of Data abroad.

VI. DATA SECURITY

Technical and organisational measures are implemented in order to protect Data and ensure that access to Data is strictly restricted to the relevant persons and entities.

However, it should be noted that it is not possible to guarantee the absolute security of Data insofar as the electronic transmission and archiving of Data involves certain risks.

VII. DURATION OF RETENTION OF DATA

The UCI retains Data for as long as necessary in order to achieve the objective for which the Data were collected unless a legal obligation requires retention for a longer period.

The UCI may retain and process certain Data, beyond the duration required for the achievement of the objective for which it was initially collected, for the purposes of documentation, conservation of archives of historical interest or in order to meet a public interest. In this respect, the UCI restricts itself to retaining and processing only Data necessary for its mission of the governance, promotion and administration of cycling.

VIII. RIGHTS

The persons concerned have certain rights by virtue of legislation on Data protection. These rights may be limited in which case the UCI shall inform the person concerned of the applicable exceptions.

These rights include:

- **The right of access:** the person 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 person concerned has the right to be informed of the manner in which his/her Data are used.
- **The right to withdraw consent:** when the UCI processes Data on the basis of the consent of the person concerned, this person may withdraw consent at any time.
- **The right to object to processing:** the person 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.
- **The right of deletion:** in certain cases, and if the applicable law so provides, the person concerned shall have the right for Data to be deleted.
- **The right of correction:** if the person concerned considers that his/her Data are inaccurate, this person shall have the right to demand their correction.
- **The right to complain:** if the person concerned is not satisfied by the manner in which the UCI processes his/her Data, this person shall have the right to contact the Swiss Federal Data Protection and Information Commissioner (PFPDT) or, when the GDPR applies, the supervisory authority of his/her country of residence or place of work.

The person concerned can use the contact details provided in Article 2 of this Policy in order to assert any of the rights described above.

Taking into account the specific nature of the sport and the need for the UCI to process certain Data, the UCI shall, upon request, weigh the interests between the UCI's legitimate reasons and the interests and rights of

the person concerned. If the UCI's legitimate reasons prevail over the interests and rights of the person concerned, the UCI may continue to process the data in question.

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

IX. AMENDMENTS

The UCI reserves the right to amend this Data Protection Policy at any time. Consequently, it is recommended that the Policy should be consulted on a regular basis. However, the UCI shall endeavour to inform those persons concerned of any significant amendments.

X. JURISDICTION AND APPLICABLE LAW

The present Policy and any issue that may arise or be related to it shall be subject to Swiss substantive law, with the exclusion of regulations on the conflict of laws.

All persons concerned accept the exclusive competence of the Tribunal d'arrondissement de l'Est vaudois for any conflicts, disputes or claims between themselves and the UCI resulting from this Policy or related to it.