

Tokyo 2020 Paralympic Games

Responsible Organisation Undertaking: ANNEX 1B



INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA OF PARTICIPANTS AND OTHER ACCREDITED PERSONS FOR THE TOKYO 2020 PARALYMPIC GAMES

IMPORTANT INFORMATION - PLEASE READ CAREFULLY

This document contains important information regarding the processing of personal data of participants and other persons requiring an Accreditation or Guest Pass for the Tokyo 2020 Paralympic Games in Tokyo, Japan. It indicates the organisations responsible for processing personal data of Accredited Persons, the key purposes for which such data is processed, as well as the applicable modalities and conditions. This notice also explains how Accredited Persons can exercise their rights under applicable data protection laws. Personal Data of Accredited Persons will be used only as necessary to achieve the purposes set out in this Information Notice, which may vary according to each Accredited Person's function(s) at the Tokyo 2020 Paralympic Games. For this reason, some provisions applicable to Participants may not apply to other Accredited Persons. If you are applying for an Accreditation or Guest Pass, please read this notice carefully and make sure you understand it.

1. Definitions

In this Information Notice, the following definitions apply:

- a. "Accreditation" means the "Paralympic Identity and Accreditation Card" (PIAC) provided to Accredited Persons to identify that they are eligible to be present at the Tokyo 2020 Paralympic Games. The PIAC functions as the official Paralympic document granting the Accredited Person the necessary access to perform a specific function during the Tokyo 2020 Paralympic Games, and (for eligible categories) as an official travel document which together with the Accredited Person's passport authorises entry into the host country of the Tokyo 2020 Paralympic Games.
- b. "Accredited Persons" means (i) all persons applying for, or being granted, the right to be accredited for the Tokyo 2020 Paralympic Games including, without limitation, Participants as well as employees, agents and contractors of National Paralympic Committees, International Federations, Tokyo 2020, IPC, IPC Affiliates, Rights-Holding Broadcasters, media and other entities listed in Section 6 and (ii) all persons applying for, or being granted a Guest Pass for a Tokyo 2020 Paralympic Games venue including, without limitation, Guest Passes for the Paralympic Village, International Broadcast Centre, Main Press Centre and competition venues.
- c. "Authorised Purposes" means the purposes referred to in Section 4 below.
- d. "Guest Pass" means the nominative cards that grant temporary visiting access to persons not accredited or whose accreditation does not permit automatic access to some controlled Paralympic venues. This includes, without limitation, Guest Passes for the Paralympic Village, International Broadcast Centre, Main Press Centre and competition venues.
- e. "IPC" means the International Paralympic Committee.
- f. "IPC Affiliates" means any entity, now existing or to be created, which is directly or indirectly controlled by the IPC, including without limitation The Agitos Foundation (Germany).
- g. "Tokyo 2020 Paralympic Games" means the Tokyo 2020 Paralympic Games in Tokyo, Japan, including all sport competitions, ceremonies, cultural events, torch relay and other activities organised by Tokyo 2020, and the IPC in connection thereto.
- h. "Participants" means the athletes, coaches, Chef de Mission, team officials and other members of the National Paralympic Committees delegations attending the Tokyo 2020 Paralympic Games.
- i. "Personal Data" means any information related to any identified or identifiable Accredited Persons.
- j. "Process" (and its derivatives) means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means.
- k. "Responsible Organisation" means any organisation seeking an Accreditation for its Accredited Persons, responsible for collecting and submitting to Tokyo 2020 certain Personal Data and other accreditation information on behalf of each Accredited Person who it requires an Accreditation.
- l. "Tokyo 2020" means the Tokyo Organising Committee for the Olympic and Paralympic Games.

2. Responsibility for the Processing of Personal Data

Personal Data of Accredited Persons will be Processed by Tokyo 2020 and the IPC for the purposes and in the manner described in this Information Notice. Where deemed necessary for the Authorised Purposes (e.g. in relation to Accredited Persons who are minors or do not have legal capacity under the laws of their country of residence), Tokyo 2020 and the IPC may also Process Personal Data which relate to Accredited Persons' parents, legal guardians or entourage. Accredited Persons are requested to inform these third parties about the contents of this Information Notice.

Without limiting their capacity to act jointly or separately as they deem in the best interests of the Tokyo 2020 Paralympic Games, Tokyo 2020 and the IPC have allocated their respective responsibilities as follows: Tokyo 2020 is primarily responsible for Authorised Purposes described in Section 4 paragraphs a, b, c and d, and the IPC is primarily responsible for Authorised Purposes described in Section 4 paragraphs e, f, g and h.

Tokyo 2020, and the IPC reserve the right to supplement or modify the information contained in this document where they deem necessary for the success of the Tokyo 2020 Paralympic Games. In case of any Processing of Personal Data of Accredited Persons not described in this Information Notice, Tokyo 2020 and the IPC will provide adequate information to the concerned Accredited Persons in accordance with applicable laws.

3. Collection of Personal Data of Accredited Persons

Personal Data of Accredited Persons is collected on different occasions as required for the preparation, promotion, presentation, operation or otherwise necessary for success of the Tokyo 2020 Paralympic Games and, in particular, when Accredited Persons:

- a. apply for an Accreditation or Guest Pass and complete the registration process to attend the Tokyo 2020 Paralympic Games through their Responsible Organisation;
- b. are provided services such as accommodation, transport, meals, assistance or healthcare;
- c. travel to and from Japan for the purposes of the Tokyo 2020 Paralympic Games;
- d. are photographed or filmed at the occasion of the Tokyo 2020 Paralympic Games or otherwise as part of the media coverage of the Tokyo 2020 Paralympic Games;
- e. are involved in any disciplinary procedure related to a suspected or actual breach of the rules applicable to Accredited Persons or other legal procedure in connection with the Tokyo 2020 Paralympic Games;
- f. are involved in a research project conducted at the occasion of the Tokyo 2020 Paralympic Games;
- g. take part in any activity in connection with the Tokyo 2020 Paralympic Games;
- h. qualify to compete at the Tokyo 2020 Paralympic Games (Participants only);
- i. compete at the Tokyo 2020 Paralympic Games (Participants only);
- j. are subject to anti-doping controls and procedures (Participants only).

As a general principle, Tokyo 2020 will receive Personal Data of Accredited Persons through the intermediary of the Responsible Organisations of the Accredited Persons. In addition, in certain circumstances, Tokyo 2020 may receive Personal Data of Accredited Persons from any third parties where such Personal Data is necessary for the Authorised Purposes set out in Section 4.

4. Authorised Purposes

Personal Data of Accredited Persons will be Processed by Tokyo 2020 and the IPC for the following Authorised Purposes

- a. allowing the Participants' participation in, and the management of, sport competitions and other activities and events organised at the occasion of the Tokyo 2020 Paralympic Games (including cultural and educational activities) and more generally enabling Accredited Persons to fulfil their role and mission at the Tokyo 2020 Paralympic Games, and preparing, participating, attending and operating the Tokyo 2020 Paralympic Games. *Key activities include: review of applications for and management of Accreditation and Guest passes for the Tokyo 2020 Paralympic Games (including all related rights and entitlements), sports entries, qualification systems and verification that Accredited Persons fulfil admission requirements, Delegation Registration Process, planning and scheduling, display of information within Tokyo 2020 Paralympic Games' venues for the presentation of the Participants;*
- b. facilitating the travel to and from, and stay in, Japan for the purposes of the Tokyo 2020 Paralympic Games and providing services to improve the Accredited Persons' experience at the Tokyo 2020 Paralympic Games. *Key activities include: provision of travel services, accommodation and related services (at the Paralympic Village or in other accommodation facilities, as applicable), transport, communications systems;*
- c. ensuring the safety of Accredited Persons and the security of the Tokyo 2020 Paralympic Games. *Key activities include: security risk assessments, access controls (including use of facial recognition) and video surveillance at and around the Tokyo 2020 Paralympic Games venues and sites;*

- d. protecting the health and wellbeing of Accredited Persons. *Key activities include: the provision of healthcare, insurance and medical services to Accredited Persons at the occasion of the Tokyo 2020 Paralympic Games, the monitoring and treatment of athlete injuries, illnesses, diseases or any other health states at the Tokyo 2020 Paralympic Games;*
- e. protecting the integrity of the sport competitions of the Tokyo 2020 Paralympic Games and ensuring the compliance of activities occurring at the Tokyo 2020 Paralympic Games with the IPC Handbook and other rules applicable to Participants and, where applicable, other Accredited Persons. *Key activities include: anti-doping programme of the Tokyo 2020 Paralympic Games (including but not limited to investigation, search and/or preservation of evidence in relation to suspected breach of the World Anti-Doping Code and other related rules and regulations), prevention of manipulation of competitions and more generally the identification, investigation and prosecution of suspected or actual breaches of the IPC Code of Ethics and other rules applicable to Participants (as detailed in the Conditions of Participation Agreement);*
- f. managing sport competitions results and keeping official records of and other relevant information about the Tokyo 2020 Paralympic Games and the Participants. *Key activities include timing and scoring services, compilation, verification and publication of official sports results, development of statistics (such as to support future Paralympic Games planning needs and optimisation processes), historical studies, scientific and other research projects (such as for the prevention of injuries and illnesses in sport) conducted during and after the Tokyo 2020 Paralympic Games;*
- g. preparing, promoting and operating the Tokyo 2020 Paralympic Games, and ensuring the widest possible media coverage and their legacy. *Key activities include: broadcast, publication, or transmission of any content in connection with the Tokyo 2020 Paralympic Games and their legacy, in any format and through any media or technology (whether now existing or created in the future), operated by Tokyo 2020 and/or the IPC, or by authorised rights-holding broadcasters and other media; presentation of Participants and provision of related services to the media covering the Tokyo 2020 Paralympic Games;*
- h. performing legal obligations. *Key activities include: disclosing Personal Data to authorities on the basis of Tokyo 2020's and/or the IPC's good faith belief of being under a legal obligation to do so;*
- i. communicating with Accredited Persons and informing them about the Tokyo 2020 Paralympic Games and activities of Tokyo 2020, the IPC and the Paralympic Movement: *Key activities include: sending of communications via email or otherwise regarding Tokyo 2020 Paralympic Games-related activities, answering queries from Accredited Persons, providing promotional or marketing communications.*

5. Categories of Personal Data Processed

Personal Data Processed by Tokyo 2020 and the IPC for the Authorised Purposes can be categorised as follows:

- a. biographical information such as family and given names, nationality, date of birth, gender, photograph, passport information;
- b. contact and travel details such as postal address, email addresses, phone number, public social media accounts, booking number, arrival and departure information;
- c. physiological information such as height, weight, biometrics, blood and urine samples, illnesses, injuries and facial data including facial features for facial recognition access control systems;
- d. information related to the participation in the Tokyo 2020 Paralympic Games such as accreditation number, sport(s) and discipline(s), team, performances, results, function, National Paralympic Committee, International Federation, registration number;
- e. health data related to the health status of a person including medical data (doctor referrals and prescriptions, medical examination reports, laboratory tests, radiographs, etc.);
- f. other relevant information necessary for or in relation to the protection of the life, body or property of a person, the security, the preparation, promotion, presentation and operation of the Tokyo 2020 Paralympic Games, the prevention of the manipulation of competitions or the conduct of the anti-doping programme (whereabouts, etc.).

6. Personal Data recipients

Tokyo 2020 and the IPC may share Personal Data including but not limited to those categorised in Section 5 c or e above between them and with the IPC Affiliates and other service providers or third parties acting on their behalf, for carrying out the Authorised Purposes. Moreover, the following recipients may have access to such Personal Data where required by their respective operations, and responsibilities in connection with the Tokyo 2020 Paralympic Games and Tokyo 2020 and the IPC shall be authorised to share such Personal Data with these recipients, where necessary for the Authorised Purposes:

- a. International Federations, who are responsible for the organisation of their sport at the Tokyo 2020 Paralympic Games;
- b. National Paralympic Committees, who select and send Participants to the Tokyo 2020 Paralympic Games;

- c. relevant authorities, including any national authorities, who are responsible for ensuring the security of the Tokyo 2020 Paralympic Games and admission in the host country and more generally accomplish their mission to support the preparation, promotion and operation of the Games in accordance with applicable laws;
- d. the World Anti-Doping Agency (“WADA”) and other Anti-Doping Organisations who fulfil their mission to fight against doping in accordance with the World Anti-Doping Code;
- e. insurance providers who may provide insurance services to Accredited Persons;
- f. healthcare and medical service providers who may provide treatment to Accredited Persons during their stay at the Tokyo 2020 Paralympic Games;
- g. rights-holding broadcasters and other media, who report on the Tokyo 2020 Paralympic Games and inform the general public;
- h. Paralympic Marketing Partners, Tokyo 2020’s domestic sponsors and other commercial partners, who provide services in connection with the Tokyo 2020 Paralympic Games and promote their partnership with the Paralympic Movement;
- i. travel and accommodation service providers, who provide services to Accredited Persons;
- j. any organisation designated by Tokyo 2020 and/or the IPC as a transferee of legacy and knowledge of the Tokyo 2020 Paralympic Games for the benefit of the Paralympic Movement or any future sports or cultural events.

Where the above-mentioned recipients consider such measure necessary for the Authorised Purposes, they may combine or supplement any Personal Information of Accredited Persons received from Tokyo 2020 and the IPC with any other information in their possession. Accredited Persons are invited to consult the websites or other official information sources made available by the above-mentioned recipients for additional information regarding their respective operations and activities and related Processing of Personal Data. Personal Data will normally be Processed in a confidential manner. Some of the Personal Data, such as some biographical information and information related to the participation of Participants in the competitions of the Tokyo 2020 Paralympic Games or related to breaches of rules applicable to Accredited Persons may be publicly disclosed.

7. Grounds for Processing Personal Data

Processing of Personal Data of Accredited Persons is based on the following grounds:

- a. the necessity in view of allowing and facilitating the Participants’ participation in the Tokyo 2020 Paralympic Games and more generally the performance by Accredited Persons of their respective operations and responsibilities in connection with the Tokyo 2020 Paralympic Games, (c.f. Section 4 paragraphs a, b, f and i);
- b. the substantial public interest to guarantee the security at the Tokyo 2020 Paralympic Games, carry out anti-doping activities, protect clean athletes, prevent manipulations of competitions, inform the general public and promote the Tokyo 2020 Paralympic Games (c.f. Section 4 paragraphs c, d, e, f and g);
- c. the legitimate interests of Tokyo 2020 and the IPC to ensure that Accredited Persons respect their covenant to comply with the provisions applicable to Accredited Persons (including the IPC Handbook and the IPC Code of Ethics, as well as for Participants the IPC Anti-Doping Code applicable at the occasion of the Tokyo 2020 Paralympic Games, the World Anti-Doping Code and the rules referred to in the Conditions of Participation Agreement), as well as to promote the Tokyo 2020 Paralympic Games and their legacy (c.f. Section 4 paragraphs e and g);
- d. applicable legal provisions authorising the Processing of Personal Data for the Authorised Purposes, as well as compliance with a legal obligation of Tokyo 2020, the IPC or other recipients listed under Section 6 (c.f. Section 4 in particular, without limitation, its paragraphs e and h);
- e. protection of the vital interests of Participants or of another natural person when providing healthcare services (c.f. Section 4 paragraph d); and
- f. Accredited Persons’ consent, where expressly granted (c.f. Section 4 paragraph i where recipient’s consent is required by applicable law).

8. Retention period of Personal Data

As a general rule, the Processing of Personal Information of Accredited Persons described in this Information Notice will cease after a period of four years following the end of the Tokyo 2020 Paralympic Games. Personal Data of Accredited Persons may be kept for a longer period of time where necessary to fulfil the Authorised Purposes including, without limitation, information deemed of historical interest (such as sports results, key biographical information) which may be kept as long as necessary for the purposes listed in Section 4 paragraphs f and g and information related to the compliance of activities occurring at the Tokyo 2020 Paralympic Games with the IPC Handbook and other rules applicable to Accredited Persons processed for the purposes listed in Section 4 paragraphs e and h. Retention periods applicable to anti-doping activities are specified in the Annex A of the International Standard on Protection of Privacy and Personal Information, forming part of the World Anti-Doping Code, which provides that Personal Data of Participants may be retained over time by WADA and the IPC for a period up to 10 years or indefinitely.

9. Security of Personal Data

Tokyo 2020 and the IPC will use technical and organisational measures to protect Personal Data against the risks of damage, destruction, loss or unauthorised access, in accordance with applicable laws.

10. International Transfer

Tokyo 2020 and the IPC will Process Participants' Personal Data mainly in Japan where the Tokyo 2020 Paralympic Games take place, and in Germany where the IPC headquarters are located. However, they shall be entitled to make Accredited Persons' Personal Data available to entities listed in Section 6 located in other countries, including outside Japan and the EU/EEA. In such case, Tokyo 2020 and the IPC shall take measures required by applicable data protection laws to ensure that Personal Data of Accredited Persons continue to benefit from an adequate level of protection.

11. Rights of Accredited Persons

Tokyo 2020 and the IPC have designated a person in charge of receiving complaints or questions in relation to the Processing of Accredited Persons Personal Data, that can be contacted at the following addresses in order to exercise their right to request access, rectification, erasure, restriction of processing, objection to the processing or to the adoption of automated decisions and, be it the case, data portability, as well as the remaining privacy rights and digital rights:

- a. In the case of Tokyo 2020, at the following address: through the enquiry form (<https://enquiry.tokyo2020.org/>) or by mail at the following address: The Tokyo Organising Committee of the Olympic and Paralympic Games, 1-8-12 Harumi Chuo-ku, Tokyo, 104-6210, Japan.
- b. In the case of the IPC, as indicated in the IPC's Privacy Policy (<https://www.paralympic.org/privacy>).

Any complaint in relation to the Processing of Accredited Persons Personal Data that has not been addressed within a reasonable timeline can be addressed to the following authorities:

- a. In the case of Tokyo 2020, to the Personal Information Protection Commission of Japan, 3-2-1 Kasumigaseki, Chiyoda-ku, Tokyo 100-0013, Japan, <https://www.ppc.go.jp/>.
- b. In the case of the IPC, to Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (LDI), Kavalleriestrasse 2-4, 40213 Düsseldorf, Germany.

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