



## **Personal Data Privacy Policy of Anti-Doping Organization of Hong Kong**

Anti-Doping Organization of Hong Kong, China (ADOHK) applies appropriate, sufficient and effective privacy protections to the Personal Information when conducting anti-doping programs which involve significant amount of athletes' personal information.

### **1. Standards for handling personal information**

1.1 World Anti-Doping Agent (WADA) has enforced the "International Standard for the Protection of Privacy and Personal Information", that can be downloaded from <http://www.wada-ama.org>, since 1 January 2009. ADOHK, as a signatory of the World Anti-Doping Code, would process the personal data strictly according to the Standard, providing such processing does not conflict with applicable privacy and data protection law, or where otherwise required by applicable law, regulation or compulsory legal process. In addition, written consent / declaration from athletes would be sought before they provide their personal data to ADOHK.

1.2 Personal data of athletes are processed in compliance with the Personal Data (Privacy) Ordinance (Cap. 486). Specially all procedures adopted are in adherence to the six data protection principles as laid down in the Ordinance. These principles include the following.

- (i) Purpose and Manner of Collection  
The personal data could only be collected for a lawful purpose directly related to a function or activity of the data user.
  
- (ii) Accuracy and Duration of Retention  
ADOHK would require data users to take all practicable steps to ensure that personal data is accurate and is not kept longer than necessary for the fulfillment of the purpose.
  
- (iii) Use of Data  
The use of personal data is prohibited for any new purpose which is not or is unrelated to the original purpose when collecting the data. The main purposes for collecting athletes' personal data consist of their whereabouts information, monitored by the Anti-Doping Administration



and Management System (ADAMS), that is run by WADA; for the application of Therapeutic Use Exemption; completing the Doping Control Form prior to collecting athletes' urine/blood samples and Anti-Doping Education.

(iv) Data Security

ADOHK would take all practicable steps to protect the personal data they hold against unauthorized or accidental access, processing, erasure, loss or use.

(v) Openness and Transparency

ADOHK would take all practicable steps to ensure openness of their personal data policies and practices, the kind of personal data held and the main purpose for holding it.

(vi) Access and Correction

ADOHK provides data subjects with the right to request access to and correction of their own personal data.

## 2. Data Access and Correction

2.1 Data access requests should be made in writing using the form prescribed by the Privacy Commissioner for Personal Data. The completed form should be sent directly to the Data Protection Officer by fax (2890 3677), by email ([antidoping@antidoping.hk](mailto:antidoping@antidoping.hk)), or in person or by post to:

Anti-Doping Organization of Hong Kong, China Limited  
Upper 10/F, Sports Complex Building  
South China Athletic Association  
88 Caroline Hill Road, Causeway Bay  
Hong Kong

2.2 When handling a data access or correction request, the Organization will check the identity of the requester to ensure that he is the person legally entitled to make the data access or correction request.

## 3. Enquiries

Any enquiries regarding the Organization's personal data privacy policy and practice may be addressed to the Data Protection Officer by post to the above correspondence



address, via email to [antidoping@antidoping.hk](mailto:antidoping@antidoping.hk) or by telephone to 2890 3644 during office hours.

**For details on how the Organization handles personal data (e.g. types of personal data held, main purposes for keeping personal data, information collected on the Organization's websites, etc.), please refer to the [ADOHK Privacy Policy Statement \(Full Version in English\)](#).**

In the event of any inconsistency between the English version and the Chinese version of this statement, the English version shall prevail.

The Organization's Privacy Policy Statement is kept under regular review, at least once per year, including to assess the processing of sensitive personal information and whereabouts information to determine the proportionality and risks of their processing or whenever there is a significant change in processing activity or technical system. This statement was last updated on 8 May 2024.



## 中國香港運動禁藥管制機構的個人資料私隱政策

中國香港運動禁藥管制機構（下稱本機構）在執行運動禁藥管制計劃時，會涉及運動員的大量個人資料，因此本機構會應用適當、充分和有效的政策去保障個人資料的私隱。

### 1. 處理個人資料的準則

1.1 自 2009 年 1 月 1 日起，世界運動禁藥機構(WADA)開始執行《私隱及個人資料保障國際標準》(International Standard for the Protection of Privacy and Personal Information)，此國際標準可於 WADA 網站(<http://www.wada-ama.org>)下載。本機構作為世界運動禁藥法規(World Anti-Doping Code)的簽署組織，除非有適用保障私隱和資料的法例、規定或強制性法律程序要求，否則在與適用的法例沒有衝突的情況下，必須嚴格遵守此國際標準處理個人資料。除此之外，運動員向本機構提供個人資料時，須簽署同意聲明書。

1.2 運動員的個人資料會按照《個人資料(私隱)條例》第 486 章處理，所有程序都依照法例中的六項保障資料原則執行。此六項原則包括：

(i) 收集目的及方式

資料使用者須合法收集個人資料，收集所得的個人資料的目的只會用於直接與其職能或活動有關。

(ii) 準確性及保留期間

本機構會要求資料使用者採取所有切實可行的步驟，以確保持有的個人資料準確無誤，而資料的保留時間不會超過達致原來目的實際所需。

(iii) 資料的使用

個人資料不會使用在任何不符合或不同於與原本收集時所列明的目的之上。收集運動員個人資料的主要目的包括：運動員使用 WADA 管理的運動禁藥管制行政管理系統(ADAMS)提交的行蹤資料、申請治療用藥豁免、收集運動員血液/尿液樣本時所填寫的運動禁藥管制表格及於運動禁藥管制教育。

(iv) 保安措施

本機構會採取所有切實可行的步驟，以保障所持有的個人資料不會未經



授權或意外地被查閱、處理、刪除、喪失或使用。

(v) 公開及透明度

本機構會採取所有切實可行的步驟，公開其處理個人資料的政策及行事方式，並交代所持有的個人資料的種類及用途。

(vi) 查閱及更正

資料當事人有權要求查閱及更正其個人資料。

## 2. 查閱及改正資料

2.1 如要向本機構提出查閱資料要求，請以香港個人資料私隱專員指明的「查閱資料要求表格」向本機構的保障資料主任提出。填妥的表格可以傳真(2890 3677)、電郵([antidoping@antidoping.hk](mailto:antidoping@antidoping.hk))、親自遞交或郵寄方式送到本機構：

中國香港運動禁藥管制機構有限公司  
香港銅鑼灣加路連山道 88 號  
南華體育會體育中心 10 樓上層

2.2 本機構在處理查閱或改正資料要求時，會查核提出要求者的身份，以確保他在法律上有權作出這項要求。

## 3. 查詢

任何有關個人資料私隱政策及實務的查詢，可透過上述通訊地址、電郵 ([antidoping@antidoping.hk](mailto:antidoping@antidoping.hk)) 或於辦公時間致電 2890 3644 向保障資料主任提出。

有關本機構處理個人資料的詳情（如持有的個人資料種類、使用個人資料的主要目的、本機構網站收集的個人資料等），請參閱本機構《私隱政策聲明》的完整版本（只提供英文版 **ADOHK Privacy Policy Statement (Full Version in Eng)**）。

如中、英文兩個版本有任何不相符之處，應以英文版本為準。



本機構將定期檢討《私隱政策聲明》，至少每年一次，包括檢討處理收集個人敏感資料和行蹤資料的相稱性和風險管理，或每逢當處理相關活動或技術系統有重要變更時。本聲明的最近更新日期為 2023 年 7 月 12 日。