FÉDÉRATION INTERNATIONALE DE LUGE

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RETENTION TIMES

ADRV: Anti-doping rule violation AAF: Adverse analytical finding ATF: Atypical finding APF: Adverse passport finding ATPF: Atypical passport finding



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- I. Referenced data will be deleted no later than the end of the calendar quarter following the expiry of the stated retention period.
- II. Retention times are limited to two categories: Twelve (12) months and ten (10) years. The period of ten (10) years represents the time period during which an action may be commenced for an anti-doping violation under the *Code*. The period of twelve (12) months represents the time period relevant to count three (3) whereabouts failures giving rise to an anti-doping rule violation, and is also applied to certain incomplete documentation and TUE-related information.

III. Retention times can be extended in case of pending or reasonably anticipated anti-doping rule violations, investigations, or other legal proceedings.

Module	Data	Retention periods	Remarks	Criteria
1 – Athlete			<i>Athlete</i> data relevant for practical purposes and for notification purposes in the event of an ADRV. These data are not particularly sensitive.	
<i>Athlete</i> (general)	Name Date of birth Sport discipline Gender	10 years as of time when <i>Athlete</i> is excluded from ADO's <i>Testing</i> program or as of time other data categories have been deleted (see, e.g. Section 6 – ADRV), whichever is later	Necessary to notify of ADRV an to keep a record of Athletes included in an ADO's Testing program.	Necessity
	Phone number(s) Email address Home address	10 years as of time when Athlete is excluded from ADO's Testing program	Same as above.	Necessity



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2 – Whereabouts*				
*(except for city, country, and In-Competition whereabouts information, which are needed for the Athlete Biological Passport – see section 7)				
Whereabouts	Whereabouts (other than city, country and In-Competition whereabouts)	12 months as of end of the whereabouts quarter for which the data was submitted	Relevant to count 3 whereabouts failures in12 months' time.	Necessity
	Whereabouts failures (filing failures and missed tests)	10 years as of date of whereabouts failure	Relevant to count 3 whereabouts failures in 12 months' time and to other possible ADRVs. If ADRV, will also be kept as part of results management file (see section 6).	Necessity
3 – TUEs			Destroying medical information makes it impossible for WADA/ADOs to review <i>TUEs</i> retrospectively after <i>TUE</i> has lost its validity <i>TUE</i> information is largely medical and therefore sensitive.	
TUE	TUE certificates and rejected TUE decision forms	10 years as of date of TUE expiry/date of rejection decision	Can be relevant in case of re- Testing or other investigations.	Proportionality/ Necessity
	TUE application forms and supp. Med information and any other TUR info not otherwise expressly mentioned herein.	12 months from date of TUE expiry	Loses relevance after expiration of TUE except in case of re-application.	Proportionality/ Necessity
	Incomplete TUEs	12 months from date of creation	Can be relevant in case of re-application.	Proportionality



4 – Testing Testing	Doping Control Forms (DCFs)	10 years as of Sample collection date	DCFs, associated mission/Testing orders, and chain of custody documents are relevant for Athlete Biological Passport and in case of re-Testing of Samples. If ADRV, will also be kept as part of results management file (see section 6).	Proportionality/ Necessity
	Mission/ Testing orders	Retained until all associated DCFs have been deleted	Same as above.	Proportionality/ Necessity
	Chain of custody	10 years as of document creation date	Same as above.	Proportionality/ Necessity
	Incomplete Testing documentation or documentation not matched to a sample	12 months as of document creation date	Documentation that is incomplete or not matched to a Sample typically results from a data entry error and is discarded after a short delay for data integrity purposes.	Proportionality
5 – Test results/ Results Management		As of Sample collection date / date of creation of relevant documents:		
	Analytical test results (incl. AAF/ATF), laboratory reports, and other associated documentation	10 years*	Necessary because of multiple violations and retrospective analysis. If ADRV, will also be kept as part of results management file (see section 6). *Subject to the criteria and requirements of the Code/International Standards, analytical data resulting from Sample analysis and other Doping Control information may, in certain circumstances, be kept beyond the applicable retention period for research and other purposes permitted by Article 6.3 of the Code. Samples and data must be processed to ensure they cannot be traced back to an athlete before being used for such secondary purposes. 10 years is the maximum retention time for identifiable data and Samples. See the International Standard for Laboratories for details.	Necessity Proportionality/ Necessity



6 - Proceedings and Decisions (ADRV)		As of date of final decision:	Managed by disciplinary body / sports federation /ADO.	
Decisions and proceedings	Sanctions and Decisions under the Code	Longer of 10 years or duration of sanction*	Necessary because of multiple violations and possible duration of sanctions.	Necessity
			*Decisions (e.g. CAS decisions) can be important legal precedents and part of the public record; in such cases, ADOs may decide to retain a decision beyond the applicable retention period.	Proportionality/ Necessity
	Relevant documentation/ files (incl. AAF or whereabouts failure record, case files, laboratory and ABP documentation packages, etc.)	Longer of 10 years or duration of sanction	Necessary because of multiple violations and possible duration of sanctions	Necessity
7 – Athlete Biological Passport				
Results	Biological variables, ATPF, APF, APMU reports, expert reviews, ABP documentation packages and associated laboratory documentation.	10 years as of date of match between results and Doping Control Form/ date of creation of relevant documents	Necessary because of multiple violations and to analyze or review biological variables, APMU reports, expert reviews, etc., over time. If ADRV, will also be kept as part of results management file (see section 6).	Necessity
Whereabouts	Whereabouts (only city, country and In-Competition whereabouts)	10 years as of end of the whereabouts quarter for which the data was submitted	Needed to support atypical/abnormal results, or to refute Athletes' claims.	Proportionality/ Necessity