



INTERNATIONAL BOBSLEIGH & SKELETON FEDERATION

# Privacy Policy

## 1. WHO WE ARE?

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The “**International Bobsleigh and Skeleton Federation**” (hereinafter “**IBSF**”, “**We**”, “**Us**”, “**Our**” and “**Ours**”) is religiously and politically neutral international non-governmental organisation **administering the sports of bobsleigh (including Bob-on-the-Road) and skeleton** on the international level.

To carry out various tasks and activities, as well to ensure our own corporate governance and organization as set out in Statutes, we may need to process your personal data (that is, any information relating to an identified or identifiable natural person (hereinafter “**Personal data**”). Therefore, under Articles 13 and 14 of the General Data Protection Regulation (hereinafter “**GDPR**”), we hereby provide you with information about our processing activities. This Privacy Policy describes how we process your personal data, including, it stipulates why and on what basis we do it, explains why we may have your data, how we ensure the safety of it, to whom may we share it; it also describes principles that we apply to determine the retention periods of your personal data and explains what rights you have and how you can exercise them (hereinafter “**Policy**”).

**As we process your personal data and determine the purposes and means of such, we are considered to be the CONTROLLER of your personal data.**

Therefore, if you have any questions regarding the processing of your personal data, **you can contact us:**

- via e-mail by writing to: [dataprotection@ibsf.org](mailto:dataprotection@ibsf.org)
- via post by writing to our legal address: Avenue de Rhodanie 54, 1007 Lausanne, Switzerland

Please do not hesitate to contact us if you have any questions and / or concerns or in case you wish to exercise your rights.

## 2. TO WHOM THIS POLICY APPLIES?

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This Policy applies to:

- visitors of our webpage: <https://www.ibsf.org/en/> (hereinafter “**Webpage**”)
- applicants that apply to various positions within the IBSF
- receivers of our commercial notices and newsletters (via e-mail)
- our members (also honorary members) and their personnel when they are in contact with us and exercise their rights and obligations as a member
- our partners, outsourced service providers and other third parties that provide services or goods to us
- natural persons that contact us via different communication channels, including, by submitting applications and other documents / inquiries
- natural persons that together with us are involved in the organization of various sporting events
- athletes and their support team members, service providers to athletes (regarding participation in sporting events)
- in other cases, if we have specifically indicated so

## 3. WHY DO WE PROCESS YOUR PERSONAL DATA?

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In general, we may need to process your personal data to fulfil various tasks in relation to the purpose why the IBSF was formed - **to administrate the sports of bobsleigh and skeleton**. In addition, due to the fact that we are a legal entity, dully organized under the laws of Switzerland (Swiss Confederation), while performing our main task, **we are also obliged to process certain personal data to fulfil requirements stipulated laws and regulations**. Furthermore, we may process personal data **to perform activities prior to the conclusion of agreements, to conclude such agreements and fulfil them**. In some cases, we may also process your personal data **to ensure our legitimate interests**, for example, to ensure proper protection of our rights, employees, and property. Since it is important for us to ensure that you are always informed about various news and current

events related to sports of bobsleigh and skeleton, with your prior consent we can process your **personal data for informational & marketing purposes** by sending you e-mails that with invitations, newsletters etc. Under fulfilment of aforesaid, our processing activities may be further divided in the following specific purposes with the following categories of personal data:

No.	Purpose	Categories of personal data
1.	Maintain our website, including, collect information about its visitors, their preferences and accumulate visitation history and statistics	<ul style="list-style-type: none"> <li>• Unique user ID for statistical data on how the visitor uses the website</li> <li>• Users' usage history</li> <li>• Geolocation, which is used to help providers determine how users who share information with each other are geographically located</li> <li>• User's sharing of content via social media</li> </ul>
2.	Carry out commercial communication via e-mail about our activities, news, and provide recipients with any other professional information related to the sports of bobsleigh and skeleton on the international level	<ul style="list-style-type: none"> <li>• Identification data (name, surname)</li> <li>• Contact data (e-mail)</li> <li>• Professional data (position, role, employer)</li> </ul>
3.	Carry out recruitment process for our vacancies	<ul style="list-style-type: none"> <li>• Identification data (name, surname, identification code, date of birth, sex, citizenship, nationality, passport / ID data)</li> <li>• Contact data (phone, address, e-mail)</li> <li>• Data related to recruitment process (application and CV, information about education, references, information about trainings, professional development, experience and previous employers and positions)</li> <li>• Personal data (interests, hobbies)</li> </ul>
4.	Ensure the participation of our members (also honorary members) personnel in the non-sporting events (meetings, panels, congresses etc.) organized by us and related to administration of bobsleigh and skeleton on the international level	<ul style="list-style-type: none"> <li>• Identification data (name, surname, sex, identification code, passport / ID data, nationality, citizenship)</li> <li>• Contact data (phone, e-mail, address)</li> <li>• Professional data (position, role)</li> <li>• Financial information (bank and bank account number, payment card details)</li> <li>• Travel data</li> </ul>
5.	Correspond (via e-mail, phone, and post) with our members (also honorary members) personnel regarding various matters related to administration of bobsleigh and skeleton on the international level	<ul style="list-style-type: none"> <li>• Identification data (name, surname, sex, nationality, citizenship)</li> <li>• Contact data (phone, e-mail, address)</li> <li>• Professional data (position, role)</li> <li>• Information contained in the correspondence</li> </ul>
6.	Conclude and fulfil contracts with service providers and other third parties to ensure the operation of the IBSF	<ul style="list-style-type: none"> <li>• Identification data (name, surname, sex)</li> <li>• Contact data (phone, e-mail)</li> <li>• Professional data (position, role)</li> </ul>
7.	Ensure the participation of athletes and support personnel in sporting events on the international level	<ul style="list-style-type: none"> <li>• Identification data (name, surname, date of birth, nationality, citizenship, gender, ID/passport data)</li> <li>• Contact information (phone, e-mail, address, training address)</li> <li>• Sports information (sport and discipline, sports results, performance related data)</li> <li>• Professional information (education data, employment data)</li> <li>• Historic and actual data relating to anti-doping rules violations and disciplinary records</li> </ul>
8.	Organization [or participation in organization] of bobsleigh and skeleton sporting events on the international level	<ul style="list-style-type: none"> <li>• Identification data (name, surname, date of birth, nationality, citizenship, gender, ID/passport data)</li> <li>• Contact information (phone, e-mail, address, training address)</li> <li>• Sports information (sport and discipline, sports results, performance related data)</li> <li>• Professional information (education data, employment data)</li> <li>• Financial information (bank and bank account number, payment card details)</li> <li>• Travel data</li> </ul>
9.	Respond in appropriate way to inquiries, submissions, and applications of various natural persons, that contact us	<ul style="list-style-type: none"> <li>• Identification data (name, surname, sex)</li> <li>• Contact data (phone, e-mail)</li> <li>• Information contained in the application (subject matter)</li> </ul>

#### 4. HOW DO WE ACQUIRE YOUR PERSONAL DATA?

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We may obtain your personal data in the following ways:

- You **personally submit personal data for processing**, expressing consent with your actions and behaviour (for example, by visiting our Website, asking questions, or communicating with us in any other another way, submitting documents and applications, participating in events);
- We obtain your personal data **from publicly available information** (for example, from publicly available registers, data bases or by using freely available information from various sources);
- In certain cases, we may also obtain personal data **from other entities** (such as other legal or natural persons, organizations, state institutions and authorities, including courts and law enforcement authorities)

**However, we wish to emphasise that if you provide us with personal data, please consider the purpose of submitting the relevant personal data and include the amount of personal data only necessary to achieve such purpose. That is, we ask you to provide personal data only to the extent that it is necessary for the purpose of the relevant letter, request, or question, and also, in particular; we ask you not to provide excessive personal data or personal data not applicable to the specific question.**

#### 5. WHAT IS THE LEGAL BASIS FOR DATA PROCESSION?

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Mainly our processing activities (related to personal data) may be based on the following legal basis:

- Your **consent** (Article 6 (1) (a) of the GDPR)

**Please note that if the processing is based on your consent, you have the right to withdraw such consent at any time - by contacting us: [dataprotection@ibsf.org](mailto:dataprotection@ibsf.org) or by unsubscribing in the way described in our e-mails. In such a case, no further processing based on the consent previously given for the specific purpose will be carried out. Please note that the withdrawal of consent does not affect the processing of data carried out at the time when your consent was valid. Withdrawal of consent cannot interrupt the processing of data carried out on the basis of other legal grounds.**

- The need to conclude a **contract** with you or to fulfil it (Article 6 (1) (b) of the GDPR)
- To fulfil and comply with various **legal obligations** (Article 6 (1) (c) of the GDPR)
- The need to ensure our **legitimate interests** (Article 6 (1) (f) of the GDPR)

Our legitimate interests, which may be the basis for data processing, are as follows:

- to carry our activities stipulated in our Statutes
- to verify the identity of data subjects, before engaging in any relationships
- to ensure compliance with the obligations of the contract
- to send other messages on the progress of the contracts and events relevant to the performance of the contracts
- to prevent fraudulent activities against us
- to ensure corporate governance, financial and business accounting, and analytics
- to ensure effective corporate governance processes
- to protect our interests, property
- to ensure and improve the quality of our activities
- to administer payments
- to ensure video surveillance for business/personal/property security
- to inform the public about our activities

In some cases, we may process personal data that is considered to be special categories of personal data (that is, personal data revealing racial or ethnic origin, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health). In such cases our processing activities may be based on the following legal basis:

- Your **consent** (Article 9 (2) (a) of the GDPR)

- To protect **vital interests** of data subjects and / or those of another person (Article 9 (2) (c) of the GDPR)
- To comply with **anti-doping laws**, sports laws, or other applicable laws or compulsory legal processes and to apply such applicable legal provisions authorising the processing of personal information for the purposes of fighting against doping (Article 9 (2) (d) of the GDPR)
- To **fulfil our role** as an anti-doping organization (Article 9 (2) (d) of the GDPR);
- To serve the substantial **public interest** of eliminating doping in sport (Article 9 (2) (g) of the GDPR)

## 6. HOW DO WE KEEP YOUR DATA SAFE?

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General description of our personal data protection **technical measures** is as follows:

- Ensuring access to information systems using passwords
- Automatic blocking of the work surface after a certain period of inactivity
- Restricting access to external media (e.g., USB, external HDDs) in our media
- Use of antivirus software and firewall
- Organization of access to information systems using user accounts with definable access rights and volumes
- Information encryption of such devices - information carriers that are used outside the premises of the IBSF (e.g., laptops, tablets)
- Ensuring local network security
- If possible, the use of pseudonymization in data processing
- Preparation of backup copies

General description of our **organizational requirements** for personal data protection:

- Regular training of employees on data protection issues
- Implementation of employee due diligence mechanisms (e.g., collection of feedback during recruitment)
- Inclusion of data processing rules and liability rules in employee employment contracts and/or certifications
- Disciplinary punishment of employees for data protection violations
- Monitoring of employees on compliance with data protection measures
- Physical restriction of employees' access to electronic and paper information carriers
- Ensuring a "clean desk policy" in workplaces
- Storage of paper format information carriers in fireproof cabinets
- Limited and controlled use of portable media devices outside our premises
- Limited use of private devices in the workplace and for work purposes
- Acceptance of password issuance and administration rules
- Ensuring appropriate security measures and legal measures if data is sent outside the EU and EEA
- Regular review of procedures and technical resources to be used
- Involvement of personal data protection officers in personal data processing

**Please note that we constantly review and improve security measures to protect your personal data from unauthorized access, accidental loss, disclosure, or destruction. We process your personal data using modern technological capabilities, considering the existing privacy risks and the organizational, financial, and technical resources available to us. We carefully check all service providers that process your data on our behalf, as well as evaluate whether such recipients apply appropriate security measures so that your data processing takes place in accordance with our delegation and the requirements of laws. In case of a security incident that causes high risk to your rights and freedoms, we will notify you if it is possible or the information will be made public on our website or in another possible way. Nevertheless, we strongly recommend that you comply with the general security rules for computer and internet use, as well as the requirements for the protection and storage of your private data (especially personal identification documents), and we will not be responsible for unauthorized access to your personal data and/or data loss if this has occurred due to your fault or negligence.**

## 7. TO WHOM MAY WE TRANSFER YOUR PERSONAL DATA AND WHY?

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**In general, we do not transfer personal data to other parties (recipients) if there is no legal basis and no purpose for such transfer, as well if the recipient, taking into account the nature, extent, context and purposes of the processing, as well as different degrees of probability and seriousness risks regarding the rights and freedoms of natural persons, is unable to transparently present appropriate technical and organizational measures that ensures that the processing of personal data is in accordance with applicable laws.**

To fulfil various purposes of personal data processing, your personal data may be transferred to:

- your authorized recipients
- our employees, members of our bodies (committees) or other specially authorized persons that are involved in day to day performance of various tasks (only on need-to-know basis)
- various government institutions, courts, law enforcement institutions, upon the justified request of these persons and only in accordance with the procedures and to the extent prescribed by law
- personal data processors, that we have engaged in the processing activities, by concluding relevant data processing agreements
- other third parties and service providers that we may hire to help carry out activities and maintain operations (for example, financial consultants, debt collectors, attorneys, accountants (or any other subject that requires transfer of this information to ensure legitimate interests of IBSF))
- our members and their personnel
- our honorary members and their personnel
- other organizations involved in the organization of bobsleigh and skeleton sports events and administration (for example, International Olympic Committee, National Olympic Committees)

### **TRANSFER OF PERSONAL DATA TO RECIPIENTS OUTSIDE THE EUROPEAN UNION / EUROPEAN ECONOMIC AREA:**

**In general, if it is possible in conjunction with the purpose of processing, we as an international organization and personal data controller try not to transfer personal data outside the European Union / European Economic Area.**

**However, in some cases such transmission may be strictly necessary to achieve the purpose of processing and therefore we may need to transfer your personal data to such recipients that are located outside the European Union and/or European Economic Area; usually such transfers are a necessary consequence of participation in organized sports. Please note that any international transfer takes place in accordance with the applicable laws and regulations, including the Chapter V of the GDPR; we and the recipient apply the conditions laid down in Chapter V of the GDPR and ensure that the transfer is done by using one of the permissible mechanisms.**

## 8. HOW LONG MAY WE STORE YOUR PERSONAL DATA?

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We store and process your personal data as long as at least one of the following criteria is met:

- the data is necessary for the purpose for which it was collected
- while the contract concluded with you is valid
- while the application, submission or other obligation is fully examined and/or fulfilled
- as long as we or you can realize legitimate interests (for example, submit objections or bring a lawsuit in court) in accordance with the procedures specified in laws
- while we have a binding legal (lawful) obligation to store the data;
- while the consent to the relevant personal data processing is valid, if there is no other legal basis for data processing

We store information about applicants who have applied for our vacancies for 6 months after the end of the application period.

**When the personal data storage period has ended, we shall securely delete your personal data or make it inaccessible (archiving) or unidentifiable so that it can no longer be linked to you**

## **9. WHAT ARE YOUR RIGHTS?**

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You have the rights to:

- receive information about the processing
- request access to your data
- request us to supplement, rectify or delete your data
- restrict processing
- object to processing (including processing of personal data based on Our legitimate interests)
- data portability
- receive a copy of data (free of charge)
- apply to the supervisory authority (the Federal Data Protection and Information Commissioner) which monitors the compliance of personal data processing activities within the regulatory framework in Switzerland

**We encourage You to contact us before making a formal complaint in order to find the quickest and most effective solution to the problem**

You can make a request by contacting us:

- via e-mail by writing to: [dataprotection@ibsf.org](mailto:dataprotection@ibsf.org)
- via post by writing to our legal address: Avenue de Rhodanie 54, 1007 Lausanne, Switzerland

Upon receipt of a request from you, we will first verify your identity, including, if necessary, exercise our right to request you to provide additional information in this regard, assess the request and comply with it in accordance with laws and regulations. Our reply to you shall be sent by post to the contact address provided by you or by email with a secure electronic signature (if the application has been submitted with a secure electronic signature), where possible, considering the method of receipt of the reply indicated by you.

We wish to point out that any rights shall be exercisable to the extent that the processing of data does not result from our obligations imposed by the applicable laws and regulations, and which are carried out in the public interest.

## **10. MISCELLANEOUS**

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We have the unilateral right to make amendments and/or additions to this Policy. The current version of the Policy is always posted on the Website. We maintain previous versions of the Policy and they are available on the aforementioned Website.