

COMPLEMENTARY INFORMATION NOTICE ON THE PROCESSING OF ACCREDITED PERSONS' PERSONAL DATA IN THE CONTEXT OF THE COUNTERMEASURES IMPLEMENTED ON THE OCCASION OF THE OLYMPIC AND PARALYMPIC WINTER GAMES BEIJING 2022

IMPORTANT INFORMATION - PLEASE READ CAREFULLY

Specific measures will be implemented by the Beijing 2022 Organising Committee for the Olympic Winter Games and Paralympic Winter Games ("Beijing 2022"), the Chinese authorities, the International Olympic Committee ("IOC") and International Paralympic Committee ("IPC") on the occasion of the Olympic and Paralympic Winter Games Beijing 2022 (the "Games") to protect the health of all accredited persons and to ensure the safe staging of such Games ("Countermeasures").

Countermeasures are described in the Playbooks and they will require the collection and processing of accredited persons' personal data, including health-related data. This complementary information notice (the "Complementary Information Notice") completes the "Information Notice on the Processing of Personal Data of Participants and other Accredited Persons for the Olympic and Paralympic Games Beijing 2022" (the "Information Notice") by providing further information on the processing of accredited persons' personal data in the context of the Countermeasures.

For the processing of personal data not related to the Countermeasures, please continue to refer to the Information Notice.

Please read this notice carefully.

Responsibility for the processing of personal data in the context of the Countermeasures

Personal data of accredited persons will be processed by Beijing 2022, the competent Chinese authorities (including, without limitation, the competent authorities of the Chinese Central Government, Beijing Municipality, Hebei Province and other local governments of the jurisdiction of Games' venues, in particular the public health authorities; collectively the "Chinese Authorities"), the IOC, IPC and other entities involved in the implementation of the Countermeasures in accordance with this Complementary Information Notice. Beijing 2022 and the competent Chinese Authorities will be primarily responsible for collecting and processing accredited persons' personal data in the context of the Countermeasures (as further described in the Section "Authorised Purposes" paragraphs a, b, c, d, f, g and h). The IOC (for the Olympic Winter Games Beijing 2022), and the IPC (for the Paralympic Winter Games Beijing 2022), will be primarily responsible for processing activities in relation to any procedure related to a suspected or actual infringement of the Playbooks or other obligations of the accredited persons and to provide additional support to COVID-19 Liaison Officers ("CLOs") (as further described in the Section "Authorised Purposes" paragraphs e, g and h).

Collection of personal data

Countermeasures require that personal data of accredited persons is collected on different occasions, locations and through different means. Personal data will be provided by the accredited persons either directly or through the intermediary of their respective Responsible Organisations (in particular their respective CLOs) or by third parties involved in the Countermeasures where such personal data is necessary for the Authorised Purposes set out in the section below. Such data will be collected through screening tests, mobile applications and other IT systems managed by Beijing 2022 or by competent Chinese Authorities, to monitor and record information, including personal data, related to the implementation of the Countermeasures and on different occasions, before travelling to and from China and during the Games. These systems include the Health Monitoring System in My 2022 App, the application page for health QR code of the Chinese Embassy and health declaration page of the Chinese Customs. Additional information may be provided to the accredited persons in relation to their use of the aforementioned applications and systems.

Authorised Purposes

In the context of the Countermeasures, accredited persons' personal data will be processed for the following purposes (the "Authorised Purposes"):

- a. allowing the participation in activities and events organised at the occasion of the Games and more generally enabling accredited persons to fulfil their role and mission at the Games, and preparing, participating, attending and operating the Games. *Key activities include: the verification that accredited persons fulfil the requirements to carry out their functions at the Games;*

- b. facilitating the travel to and from, and stay in, China for the purposes of the Games. *Key activities include: the review of the relevant health information, such as the COVID-19 vaccination status of the accredited persons to enable the entry of such accredited persons in China and into the closed loop system; assessment of accredited persons' eligibility for travelling to and from China in case of previous COVID-19 infection;*
- c. ensuring the safety of accredited persons and the security of the Games, including implementing Countermeasures. *Key activities include: health status, symptoms and temperature report, body temperature checks, contact tracing, COVID-19 screening tests and, if necessary, medical treatment, quarantine or isolation of a person whose test result is a positive, management of COVID-19 matters, positive case management and other measures to prevent and control infectious diseases including COVID-19, health risk assessments, and access controls for the public health (including body temperature checks on entrants to Games' venues);*
- d. protecting the health and wellbeing of accredited persons and other persons attending the Games. *Key activities include: the provision of healthcare, insurance and medical services to accredited persons at the occasion of the Games, the monitoring and treatment of athlete injuries, illnesses, diseases or any other health states including COVID-19 infection at the Games;*
- e. ensuring the compliance of activities occurring at the Games with the Olympic Charter, the IPC Handbook, Playbooks and other rules applicable to accredited persons. *Key activities include: investigation related to an alleged infringement of the Playbooks on the occasion of the Games as described in the Playbooks Disciplinary Regulations or other rules applicable to accredited persons or other legal procedure in connection with the Countermeasures as well as more generally taking any procedure according to the Rules of Procedure with respect to alleged violations of the Olympic Charter or of any other decision or applicable regulations issued by the IOC or any IF or NOC, including in relation to disciplinary proceedings on the occasion of the Games.*
- f. communicating with accredited persons and informing them about the Countermeasures: *Key activities include sending of communications via email or otherwise regarding the Countermeasures, answering queries from accredited persons, in relation with prevention and control of infectious diseases including COVID-19;*
- g. performing legal obligations;
- h. providing support to CLOs. *Key activities include: for the IOC the provision of briefing materials to CLOs through the dedicated online CLO Portal, and for Beijing 2022 providing CLOs with information on COVID-19 positive cases and/or close contacts within their respective Responsible Organisations.*

Categories of personal data processed in the context of Countermeasures

The following categories of personal data will be processed in the context of the Countermeasures:

- a. biographical information such as family and given names, nationality, date of birth, gender, passport information;
- b. contact and travel details such as postal address, email addresses, phone number, arrival and departure information;
- c. information related to the participation in the Games such as accreditation number, sport(s) and discipline(s), team, function, Responsible Organisation;
- d. physiological information such as illnesses, height, weight, biometrics, blood samples and facial data including facial features for facial recognition access control systems;
- e. health data related to the health status of a person including medical data (doctor referrals and prescriptions, medical examination reports, epidemiological history, relevant medical history such as prior history of COVID-19 tests, laboratory tests, radiographs, presence of antibodies, etc.), daily health status (including daily body temperature, symptoms) before travelling from and to China and during the Games, COVID-19 vaccination status, COVID-19 certificate(s), laboratory test results, test reports;
- f. information related to the prevention and control of the infectious diseases, including in case of an incident, such as, whereabouts, contact details of persons who would have been in close contact with an accredited person who tests positive for COVID-19, visited facility, violation of behavior rules;
- g. other relevant information necessary for or in relation to the protection of the life or body of a person, the security, the preparation, the operation and the safe staging of the Games.

Personal data recipients

As part of the implementation of the Countermeasures, accredited persons' personal data including sensitive data such as health-related data may be shared with the following recipients for the Authorised Purposes:

- a. Responsible Organisations (including their respective CLOs) who are responsible for the accreditation of accredited persons within their delegation, who may have to coordinate with Beijing 2022 and the competent Chinese Authorities in case an accredited person tests positive for COVID-19 or is considered as a close contact, and who may be involved to support any investigations in case of an alleged infringement of the Playbooks or other rules applicable to accredited persons or other legal procedure in connection with the Countermeasures, as well as more generally according to the Rules of Procedure with respect to alleged violations of the Olympic Charter or of any other decision or applicable regulations issued by the IOC or any IF or NOC, including in relation to disciplinary proceedings on the occasion of the Games;
- b. International Federations ("IF"), who are responsible for the organisation of their sport at the Games;

- c. competent Chinese Authorities who are responsible for ensuring the security of the Games, admission in China, and the implementation of the Countermeasures such as, in cooperation with Beijing 2022, managing confirmed COVID-19 cases and close contacts, including coordinating treatment and/or isolation of confirmed cases, and more generally accomplishing their mission to support the preparation, promotion and operation of the Games in accordance with applicable laws;
- d. International Testing Agency (“ITA”), whom the IOC has entrusted with certain tasks related to the implementation of the anti-doping programme in relation to the Olympic Games Beijing 2022 and who may need such personal data for anti-doping test planning and for determining any alleged anti-doping rule violation;
- e. insurance providers who may provide insurance services to accredited persons;
- f. healthcare and medical service providers who may provide treatment to accredited persons and COVID-19 screening facilities which could ensure the implementation of the Countermeasures during their stay at the Games;
- g. the Medical Expert Panel (composed of members of the China Center for Disease Control (CDC), the Beijing CDC and five international expert representatives of the IOC, IPC and Winter IFs) who provides case assessment for potential exemptions for vaccination of certain accredited persons for medical reasons and protocols for complex cases, as well as guidance on the early management of potential close contacts of confirmed COVID-19 cases, based on the screening testing plan that will be implemented at the Games;
- h. travel and accommodation service providers, who provide services to accredited persons.

These recipients access such personal data where required by their respective operations and responsibilities in connection with the Games and Beijing 2022, the IOC and the IPC shall be authorised to share such personal data among them and with these recipients as well as other service providers or third parties acting on their behalf, where necessary for the Authorised Purposes.

Where necessary for the Authorised Purposes, these recipients may combine or supplement any personal data of accredited persons received in the context of the Countermeasures with any other information in their possession.

Grounds for processing personal data

Processing of accredited persons’ personal data in the context of the Countermeasures is based on the following grounds:

- a. the substantial public interest to guarantee the security at the Games, prevent health hazards which may be caused by, in particular, COVID-19, carry out anti-doping activities, protect clean athletes;
- b. protection of the vital interests of accredited persons or of another natural person when providing healthcare services;
- c. the necessity in view of allowing and facilitating the accredited persons’ participation in the Games and more generally the performance by accredited persons of their respective operations and responsibilities in connection with the Games;
- d. the legitimate interests of Beijing 2022, the IOC and the IPC respectively, to ensure that accredited persons respect their covenant to comply with the provisions applicable to them (including the Olympic Charter, the IPC Handbook, Playbooks and other rules applicable to accredited persons);
- e. applicable legal provisions authorising the processing of personal data for the aforementioned authorised purposes, as well as compliance with a legal obligation of Beijing 2022, the IOC and the IPC respectively or other recipients listed above;
- f. accredited persons’ consent, where consent is required by applicable law.

Retention period of personal data

As a general rule, the processing of accredited persons’ personal data by Beijing 2022, the IOC and the IPC respectively in the context of the Countermeasures will cease as soon as it is not necessary to fulfil the aforementioned Authorised Purposes and no later than the 31 May 2022. Notwithstanding the above, Personal Data of Accredited Persons may be kept for a longer period of time where necessary to fulfill the aforementioned Authorised Purposes including, without limitation, information related to the compliance of activities occurring at the Games with the Olympic Charter, the IPC Handbook, Playbooks and other rules applicable to accredited persons or other legal procedure in connection with the Countermeasures. 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, the IOC, the IPC and the ITA for a period up to 10 years or indefinitely.

Security of personal data

Technical and organisational measures will be put in place to protect personal data against the risks of damage, destruction, loss or unauthorised access, in accordance with applicable laws.

In particular, all the exchanges of personal data, including health related data, between the entities involved in the implementation of the Countermeasures, as well as the storage of such data by these entities, will be made in a secure manner in accordance with applicable laws.

International Transfer

Accredited persons' personal data in relation to the Countermeasures will be mainly processed in China where the Games take place. However, such personal data may be made available to the abovementioned recipients who may be located in other countries, including outside China and the EU/EEA to extent that it is necessary for the Authorised Purposes. In such case, appropriate measures required by applicable laws will be implemented to ensure that such personal data continue to benefit from an adequate level of protection.

Rights of accredited persons

Beijing 2022, the IOC 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 Beijing 2022, mail at the following address: Accreditation Center of Beijing Organising Committee for the 2022 Olympic and Paralympic Winter Games, No. 68, Shijingshan Road, Shijingshan District, Beijing.
- b. In the case of the IOC, through IOC's dedicated portal as indicated in IOC's privacy policy (<https://www.olympic.org/privacy-policy>) or by mail at the following address: International Olympic Committee, Data Protection Officer, Legal Affairs Department, Maison Olympique, 1007 Lausanne, Switzerland. Should the GDPR apply, EU residents may also contact the IOC's EU representative, Olympic Broadcasting Services S.L., at the following address: Calle de Torrelaguna, 75, 28027 Madrid, Spain.
- c. In the case of the IPC, as indicated in the IPC's Privacy Policy (<https://www.paralympic.org/privacy>) or by mail at the following address: Adenauerallee 212-214, 53113 Bonn, Germany.

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 Beijing 2022, to the Chinese authorities in charge of personal information protection (Cyberspace Administration of China: www.12377.cn).
- b. In the case of the IOC, to Swiss Federal Data Protection Commissioner, Feldeggweg 1, CH – 3003 Bern, Switzerland, <https://www.edoeb.admin.ch>. Should the GDPR apply, for EU residents, to the Agencia Española de Protección de Datos, c/ Jorge Juan 6, 28001 Madrid, Spain, <https://www.aepd.es/>.
- c. In the case of the IPC, to Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (LDI), Kavalleriestrasse 2-4, 40213 Düsseldorf, Germany.

Further information

This notice may be amended from time to time where necessary for the implementation of the Countermeasures and adequate information will be provided to the concerned accredited persons in accordance with applicable laws.

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