

## Privacy Policy – Covid-19 FIS Passport

### Updated Version 18 June 2021

This Covid-19 FIS Passport Privacy Policy serves as an addendum to the FIS Privacy Policy available on the [FIS homepage](#). This document provides information about how FIS collects and uses the health status information and Covid-19 test results in your Covid-19 FIS Passport.

#### 1. Background

FIS recognises the importance of maintaining the safety and health of everyone involved at FIS Events, including the athletes, coaches, FIS staff, local organising committee ("LOC") members, volunteers and spectators. In order for FIS Events to be delivered, FIS must seek to collect and hold additional personal data about you in relation to the unprecedented challenges during the Covid-19 pandemic.

#### 2. What data does FIS collect in the Covid-19 FIS Passport?

##### a) *Registration for the Covid-19 FIS Passport*

Prior to your participation at a FIS Event, you are required to register for a Covid-19 FIS Passport. The Covid-19 FIS Passport is a database that manages the health status information and the Covid-19 test history of registered individuals. The registration will capture the following information: full name, gender, date of birth, stakeholder group, role/position (Staff ID), company/federation, disciplines, FIS Code, Covid-19 Vaccine type, date of the last Vaccine received, e-mail, phone number, passport/ID number and full address. The submitted data can be used by FIS for the statistical and survey purposes.

##### b) *Pre-event*

Prior to the arrival at a FIS Event you have to provide information about your Covid-19 tests and upload your test certificates on the Covid-19 FIS Passport Portal. In this regard, the following information will be captured: date and time of the tests, country of the laboratory and the test results. In addition, you will be required to complete a questionnaire ("Health Questionnaire"). You can answer these questions via SMS, WhatsApp or e-mail. You will not be permitted to enter the FIS Event site until you have completed the Health Questionnaire and provided the Covid-19 test results on the Covid-19 FIS Passport Portal.

##### c) *On-site*

At each FIS Event that you attend, you might be required to complete the Health Questionnaire on a daily basis.

#### 3. Lawful basis for processing your personal data

Your personal data will be kept confidential and secure and will only be used for the purposes for which they were collected and in accordance with this Covid-19 FIS Passport Privacy Policy and applicable data protection laws. The General Data Protection Regulation ("GDPR") and the Swiss Data Protection Act require specific conditions to be met to ensure that the processing of personal data is lawful. The relevant GDPR conditions that cover FIS' lawful basis for processing your personal data under this Covid-19 FIS Passport Privacy Policy are the following:

*a) Legitimate interest (Art. 6 para. 1 lit. f GDPR)*

The FIS' legitimate reason for processing your data is to safeguard the health and safety of all attendees at FIS Events and to operate, administer, promote, regulate and govern the FIS' competitions in an effective and lawful manner. Such processing is in the legitimate interest of FIS, its partners and all stakeholders in the ski sport.

*b) Public health (Art. 9 para. 2 lit. i GDPR)*

In addition, processing your data on the Covid-19 FIS Passport Portal is in the public interest for reasons of public health. As the FIS Events are international, FIS considers it necessary to collect your personal data to protect against domestic and cross-border threats to public health.

#### **4. Who does FIS share your personal data with?**

FIS collects your personal data in the Covid-19 FIS Passport developed in collaboration with SKIDATA. The data are hosted by the certificated IT provider mtms Solutions GmbH ("mtms") in Eugendorf (AUT). The products of mtms operate on SSL encryption and are regularly tested with penetration tests. The mtms provides all necessary infrastructure to be GDPR compliant. All systems operate on a comprehensive rights- and role-based access control system. This assures that users cannot access any data which are not relevant to them and minimises the risk of data leak/breach.

FIS limits access to your personal data to those employees, contractors and other third parties who have a business need to know.

Upon requests by a LOC, FIS grants access to a secure web application of the Covid-19 FIS Passport Portal in order to streamline the accreditation process for individuals participating or attending FIS Events. The LOCs have thereby access to the following data concerning the respective FIS Event: full name, role/position, answers to the Health Questionnaire and the last Covid-19 certificate. The LOCs are contractually bound to grant only their LOC Health Coordinator access to the Covid-19 FIS Passport Portal.

If FIS becomes aware that you may have been exposed to Covid-19 at a FIS Event, FIS may use your personal data for contact tracing purposes. In addition, FIS creates accounts for National Ski Associations in which they can check whether their own team members have registered for a Covid-19 FIS Passport and uploaded the required information. In this context, the National Ski Associations receive a list of their team members, showing whether their athletes have fulfilled the mentioned requirements (yes/no-list). The data themselves are not made available to the National Ski Associations.

#### **5. How long does FIS retain your personal data?**

FIS will retain your Health Questionnaire replies for 14 days after the respective event and the data for the registration as well as the Covid-19 testing history and certificates until the end of the 2021/2022 season (i.e. until 30 June 2022).

#### **6. How to exercise your rights**

With regard to your rights, please refer to the FIS Privacy Policy and Chapter 3 of the GDPR for more information. If you have any concerns about how FIS handles your personal data regarding the Covid-19 FIS Passport you may contact FIS at [wenger@fisski.com](mailto:wenger@fisski.com).