DATA PROTECTION ACTIVITY REPORT

Reporting period: 1 January 2025 – 31 December 2025
Organisation: National Anti Doping Agency of Germany
NADA Germany's External Data Protection Officer for 2025: Dr Bettina Kraft

Role and involvement of the external data protection officer

During the reporting period, the external data protection officer acted in an advisory and supervisory capacity in accordance with Article 39 of the GDPR. She had no operational responsibility or decision-making authority in matters relating to data protection. She was regularly involved through scheduled meetings and on an ad hoc basis in matters relevant to data protection.

Summary

Cooperation between the NADA Germany coordination team and the contact persons at SITS Deutschland GmbH was consistently very constructive and efficient throughout the reporting period. This is attributable in particular to the established regular meetings and the ad hoc direct involvement of the data protection officers. This ongoing involvement confirms the high level of awareness among staff regarding data protection issues. The establishment and further development of the data protection management system (DPMS) were consistently pursued during the reporting period. The large number of cases processed and results achieved demonstrates the effectiveness of the measures implemented. A core element of a data protection management system is continuous improvement, which is why existing measures must be regularly reviewed for completeness and effectiveness. Furthermore, new regulatory requirements and changes in the system and process landscape must be continuously assessed. To this end, it is necessary to maintain sufficient resources both for regular data protection tasks and for requirements arising at short notice.

Issues/cases handled during the reporting period

During the reporting period, a request from data subjects in accordance with Chapter III of the GDPR was answered within the prescribed time limit. The requests mainly concerned requests for information under Article 15 of the GDPR. In addition, two data protection incidents were identified, assessed, reported and resolved. Where necessary, reports were made to the competent supervisory authority in accordance with Article 33 of the GDPR, and data subjects were notified in accordance with Article 34 of the GDPR.

Data processing agreements pursuant to Article 28 of the GDPR are reviewed by NADA Germany.

During the reporting period, 18 apps/tools and service providers were assessed for compliance with data protection law prior to deployment, and the underlying processes were analysed. In cases where these assessments indicated a likely high risk to the rights and freedoms of data subjects, data protection impact assessments were carried out in accordance with Article 35 of the GDPR. This was done on one occasion prior to the introduction of new HR software. Furthermore, policies and guidelines were subjected to a data protection review.

Status and Outlook

Overall, the reporting period shows an increasing level of maturity in the organisation and processes relating to data protection. For the coming year, it is recommended that existing measures be further consolidated, regular reviews continued and, in particular, that changes to the IT and tool landscape continue to be supported from an early stage in accordance with data protection law.

Direct contact for enquiries regarding the duly appointed Data Protection Officer: Email: datenschutz@nada.de

Overview of NADA Germany's data protection management system, as at 31 December 2025

No. [lfd.]	Criticality [1-6]	Compliance [%]	Task (DSMS)
1	1	100	Appointment of a Data Protection Officer
2	1	100	Registration of the Data Protection Officer with the supervisory authority
3	1	100	**Organisation of data processing in accordance with Article 28 of the GDPR (DP)**
4	1	100	1. To contractors, approval of template
5	1	100	1. To partners (contractors), creation of template
6	1	100	2. Creation of list of service providers (credit check)
7	1	100	3. Dispatch of DPAs
8	1	100	4. Checking of returns
9	1	100	5. Acceptance of returns
10	1	100	6. Responding to queries from service providers – Level 1
11	1	100	7. Respond to service providers' queries – Level 2
12	1	100	Create TOMs for clients
13	1	100	**Documentation of the record of processing activities pursuant to Art. 30 GDPR (RPA)**
14	1	100	1. Introductory workshops, EVERY specialist department
15	1	100	2. Creation of 5–10 RPAs per specialist department
16	1	100	3. Approval of the RPAs
17	1	100	**Organisation for providing accurate information in accordance with Chapter III of the GDPR**
18	1	100	1. Designing the process
19	1	100	2. Drafting the reply letter
20	1	100	**Organisation for providing information to the data protection supervisory authority (72 hours)**
21	1	100	1. Designing the process
22	1	100	2. Drafting the reply letter
23	1	100	Regulating the use of private email (VEWA)
24	1	90	Implementation of website privacy policy
25	1	100	Email application process: ensure deletion following rejection
26	1	100	Ensure newsletter consents
27	1	100	Data protection information for customers (general)
28	2	100	Employees' DECLARATION OF COMMITMENT to data confidentiality
29	2	100	Deletion policy for archiving
30	2	100	Organise employee awareness training
31	2	100	Data protection policy
32	2	90	Data protection policy / Data protection guidelines
33	2	100	Define NDA template
34	2	100	Carry out data protection impact assessments for potentially high-risk processing operations
35	2	50	Create and evaluate encryption inventory
36	2	100	Review customer consents
37	3	100	Create and evaluate list of retrieval procedures