



FÉDÉRATION INTERNATIONALE DES ÉCHECS

Recognized by the International Olympic Committee
Avenue de Rhodanie 54 - 1007 Lausanne, Switzerland, Tel: + (41)21 6010039
Athens office: 9 Syggrou Ave., 11743 Athens, Greece
Tel.: (+30) 210 9212047, Email: office@fide.com
www.fide.com

To: EGA (Abu Dhabi – February 2020)
Subject: Data Protection Committee activities in the year 2019

1. ESTABLISHMENT

The Data Protection Committee has been established as per decision Q2PB/2019/11 of the Second Quarter Presidential Board in Baku.

2. MEETING

On July 8th – 9th the Committee held its first meeting in Lausanne where it made the scheduled of the actions to be taken and collected from Technical Advisor and Elista Office administrator Vladimir Kukaev the necessary information.

The minutes of the meeting were delivered to FIDE MB and are here attached ([annex 01](#)).

A new meeting is expected to be held after Extraordinary General Assembly.

3. ACTIVITIES ALREADY COMPLETED

- A new email address ([data.protection@fide.com](#)) has been established to send official communication about data protection and issues from players or any other people requiring information;
- All the Commissions have been questioned on how they deal currently with personal data in order either to build a proper policy, either to suggest them amendments for them to be compliant with all the relevant obligations towards the Laws and FIDE own policy;
- ARB, DIS, EDU, ETH, EVE, FPL, GSC, MED, OLC, PDC, QC, SC, SPP, TEC, TRG, VER and WOM gave their responses and they have been considered for the abovementioned purposes;
- The Data Protection Policy has been written considering also future projects (Chess-ID) which will be totally compliant ([annex 02](#));
- DPLA advised QC for the questionnaires about time limit for a game to be rated;
- DPLA also joined a meeting of ARB in order to advise on how to deal with personal data for future projects. The ARB Chairman and DPLA agreed on keeping in touch step by step. ARB database has been revised and it is compliant to any relevant obligation;
- FRS welcome page with term and conditions has been created in order to inform ROs on their obligations about data protection ([annex 03](#)). The liability of the ROs is hence clearly explained towards FIDE and single individuals;



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- FRS data has been totally encrypted to grant more safety;
- Daily issues coming from the players and other people registered in FRS are solved. No request have been answered in more than 72 hours;
- The Committee has started to work on handbook attachments review, in order to rewrite them as to be compliant to the Laws and FIDE own policy. See point 5 on the topic;
- By this reason, DPLA proposed some amendments and questioned ARB, EVE, FPL, QC and SPP in order to coordinate the efforts and build forms which either can be compliant and either useful for the purpose of the commissions;
- DPLA and the Chairman of the task force for FIDE new Charter were in touch about statements on data protection to be included in the proposed new Charter;
- Periodical reports were sent to MB and PB ([annex 04](#) and [annex 05](#)).

4. REQUESTS ADRESSED TO MB and PB

- *Put a regulation about disclosing people birth year in the FIDE web-profile.*

In general, FIDE would require a specific consent before publishing people's birthday or year, since this information is mostly unnecessary (or at least it is unnecessary it to be known in public), but given that this information was already displayed, legally, before the Law was enforced, it is even possible to erase only the birth year of people making one specific request.

The Committee has already received several requests on this topic.

- *Request Federations to use in a proper way the FIDE rating system.*

At the moment, no one knows when and by whom his data are put by one Rating Officer in FRS.

The ideal system would be to send one confirmation email but this may affect tournaments to be rated because the rating officer would be subject to wait one email from the player which eventually could not arrive at all.

But, it is possible to send only one notification email and then the owner is free to perform the cancellation process if he doesn't agree with the policy. This arrangement is technically pretty possible. Moreover, FRS already has a field "email".

On both these topics Data Protection Committee proposed specific actions to the MB ([annex 06](#)): first two actions were already accepted, and the others postponed.



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5. PROPOSED AMENDMENTS TO FIDE HANDBOOK ATTACHMENTS

- 5.1) In FIDE Handbook A.06 replace the attached form (FIDE bid form) with annex 07;
- 5.2) In FIDE Handbook A.10 replace the attached form (in tournament complaint form) with annex 08;
- 5.3) In FIDE Handbook A.10 replace the attached form (post tournament complaint form) with annex 09;
- 5.4) In FIDE Handbook B.01 replace the attached form (tournament report form) with annex 10;
- 5.5) In FIDE Handbook B.01 replace the attached form (IT1) with annex 11;
- 5.6) In FIDE Handbook B.01 replace the attached form (IT2) with annex 12;
- 5.7) In FIDE Handbook B.06 replace the attached form (tournament report form) with annex 10.

Annexes:

- 01 – minutes of the first meeting;
- 02 – privacy policy;
- 03 – terms and conditions for ROs to use FRS;
- 04 – first report;
- 05 – second report;
- 06 – actions proposed to MB;
- 07 – new proposed FIDE bid form;
- 08 – new proposed in tournament complaint form;
- 09 – new proposed post tournament complaint form;
- 10 – new proposed tournament report form;
- 11 – new proposed IT1 in cooperation with QC;
- 12 – new proposed IT2 in cooperation with QC.

Venice – Lausanne, dated today 13th January, 2020

Mr Willy Iclicki (BEL): Data Protection Officer;
Mr Marco Biagioli (ITA): Data Protection Legal Advisor;
Mr Vladimir Kukaev (RUS): Data Protection Technical Advisor.



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To: Fide President, Fide Management Board
Subject: Data Protection Committee meeting in Lausanne 8th – 9th July, 2019

Minutes

The Committee collected the necessary information from Technical Advisor on how Fide website currently works and how in the future the new website will work.

The Committee concluded the following conditions apply:

- Fide receives data directly from individuals and from third parties;
- Commercial uses are not in provisions;
- Some security measures can be upgraded.

The Committee agrees to establish a new email address privacy@fide.com.

The Technical Advisor informs the Committee on the development of the new website.

The Committee agrees to advise that future website, databases and registration procedure, as well as passports and identity storage will be controlled by Fide to avoid any possible misuse of the data and also the impossibility to access the databases in case any dispute might arise with external companies.

The Committee agrees to ask any Commission to inform the Data Protection Officer on how they process and use personal data and for what purposes, in order to prepare the data protection policy.

The Committee agrees to divide the data protection policy into two sections, one containing general

provisions and a second one especially dedicated to future ID project, which seems to need some particular provisions.

The Committee agrees to put in any outgoing email from the Office a disclaimer on the use of personal data.

The Committee agrees to prepare a first draft of the policy excluding information missing from Commissions and the section B.

The Legal Advisor will prepare a circular to be sent to any National Federation Rating Officer containing the policy and a code of processing data.

The Legal Advisor proposes a first draft of the privacy policy (annex 1) to be adopted. The Committee agrees to adopt the draft and send it to Fide Legal Advisors A. Martynov.

The Committee agrees on these following steps:

Get information from Commissions: 7 days;

Finalize the policy and publish on Fide website after approbation from MB: 30 days;

Take actions about security measures, automatic email systems and code of behaviour for RO: 30 days.

Proceed to step 3 and 4 of the report submitted by Legal Advisor to MB and PB by the 15th of August.

Annex: privacy policy draft.

Willy Iclicki

Data Protection Officer

Marco Biagioli

Legal Advisor

Vladimir Kukaev

Technical Advisor

In order to perform its aims to be the supreme body responsible for the sport of chess and give National Federations, players and any other individual the services FIDE is intended to give as they are listed in the Statutes, it needs to collect, store and process personal data.

FIDE cares that the data are handled in a fair and transparent way and makes all the necessary efforts to enforce this goals.

1. DATA CONTROLLER, REPRESENTATIVE, DPO, DATA PROTECTION COMMITTEE

Data Controller:

FIDE – Federation Internationale des Echecs, whose legal seat is Avenue de Rhodanie 54 – 1007 Lausanne, Switzerland.

Current legal representative is its President Mr. Arkady Dvorkovich.

As per decision Q2PB/2019/11 FIDE designated the following officials:

Data Protection Committee:

Mr Willy Iclicki (BEL): Data Protection Officer;

Mr Marco Biagioli (ITA): Data Protection Legal Advisor;

Mr Vladimir Kukaev (RUS): Data Protection Technical Advisor.

Data Protection Representative for the European Union:

Mr Willy Iclicki (BEL).

Data Protection Officer:

Mr Willy Iclicki (BEL).

2. CONTACTS

Data Protection Representative for the European Union and Data Protection Officer:

Mr Willy Iclicki (BEL) whose seat inside the European Union is Avenue du Globe 55 – Box 20 – 1190 Brussels, Belgium.

E-mail: privacy@FIDE.com

Data Protection Committee:

E-mail: privacy@FIDE.com

SECTION A: GENERAL PROVISIONS FOR ORDINARY DATA COLLECTION

3. PURPOSE OF DATA COLLECTION

FIDE collects data in a fair and transparent way only in order to let itself, its internal bodies and its services work.

The use and storage of the relevant data is necessary in order:

- to let FIDE internal bodies, boards, commissions and committees perform their duties according to the Statutes and the Regulations, as well as according to the relevant decisions on their goals;
- to let FIDE services, among which there are FIDE Rating System (FRS), FIDE titles and classification of players, arbiters, organizers, trainers and officials, properly function;
- to maintain the functionalities of FRS: like in any other sport, FRS is necessary to estimate the strength of the players and create a ranking of them to let any sport activity (championships, tournaments) be run in a fair way;
- to properly let FIDE to give titles according to the relevant Regulations;
- to let FIDE appoint people to any duty in its internal bodies or to any role in its events.

4. LEGAL BASIS

Data are collected and processed by legal agreement and in order to provide the services requested to FIDE itself.

FIDE processes data in a fair and legitimate way only if it is necessary for the abovementioned services to work properly: by participating to any FIDE rated event, as inserted in FRS by any National Federation, and by requesting any National Federation to issue a FIDE Identification Number (FIN), or by requesting FIDE to be included in the directory or any other list, you agree to the process, as indicated above.

5. HOW FIDE COLLECTS DATA – DATA COLLECTORS

FIDE collects data in several different ways:

- Data can be inserted in FRS by National Federations, directly.
In this case, FIDE notifies the insertion of the data in the system by sending an email to the individual whose data were collected, hence he is informed that a National Federation inserted his data in FRS and might exert his rights.
- Data can be inserted in FRS by Elista FIDE Office (EFO), directly.
In this case, FIDE uploads and stores data only after having received an explicit consent by the individual whose data are going to be collected.
- Data can be sent by any individual himself, by sending an email to the Administration or manually registering in the FIDE website or connected services.
In this case, FIDE stores data only after having received an explicit request by the individual himself.

In all the abovementioned cases, for underage people (in the country they are citizens of) consents are given or requests are made by their legal tutors and confirmed by the individuals themselves after the majority.

6. COLLECTED DATA

FIDE collects different data according to the level as mentioned here following:

- For any individual included in FRS and any other individual to whom FIDE issues a FIN: Name, Surname, Birthday, Federation, Gender (M or F), email address.
When the Administration requires a confirmation about the abovementioned data, it may require a copy of an official identification document.
This data are ordinarily submitted by National Federations and notified to the single individual as per point nr. 5.
- For people receiving prizemoney or refunds directly from FIDE, it also collects physical addresses, phone numbers and bank details and local taxes details.
This data are ordinarily provided directly from the single individual.
- For officials, organs, and people permanently or temporarily involved in the Administration FIDE also collects a second email address, physical addresses, phone numbers and bank details.
This data are ordinarily provided directly from the single individual.
- For people applying for titles or exchange of Federation FIDE also collects physical addresses, phone numbers, place of birth and nationality.
This data are provided from the single individual through his National Federation.
- In case of stipulation of specific contracts, additional data may be required for specific purposes and upon specific consent.
This data are provided directly from the single individual.
- For FIDE employees, FIDE also collects tax details, and social insurance number/details and any other data required by national authorities upon a legal obligation.
This data are provided directly from the single individual.

FRS may host a picture of anyone who is recorded in the database.

Underage people photos are not displayed in any case until they reach the majority, unless it is sent personally by their legal tutors.

Photos about any other person included in FRS are displayed only upon his or his Federation request addressed to FIDE offices.

In case that FIDE suspects the request needs to be confirmed, may ask the owner to confirm his willing his picture to be displayed on FRS.

Photos taken during sport public events has not such restrictions.

7. DATA COLLECTING ACTIVITY AND REFUSAL

Data collection is necessary in order to achieve the purposes and complete the activities above indicated. In case of refusal to let your data, as indicated above, be processed by FIDE, the abovementioned activities shall be impossible.

Thus, in case of refusal, the following consequences shall occur:

- For any individual to be included in FRS and any other individual requiring a FIN, refusal prevents that individual to be included in FRS and take part to any chess event;
- For people entitled to receive a prizemoney or refunds directly from FIDE, refusal prevents FIDE to make any payment.
- For officials, organs, and people permanently or temporarily involved in the Administration, refusal of data policy as mentioned in their contract or appointment letter, prevents FIDE to include the name in the directory and the appointment to progress.
- For people applying for titles or exchange of Federation, refusal prevents FIDE to process their application.
- In case of stipulation of specific contracts which require additional data, refusal prevents the contract to be concluded.
- For people applying for a job, refusal prevents FIDE to sign the contract.

8. FORMAT OF STORAGE

Your data are stored electronically and in paper.

The electronic data archives are stored in FIDE servers, which are located in Germany and Russia. Safety measures as described in point nr. 16 protects the electronic archives.

The paper archive is stored in Lausanne, at the FIDE main office, in classified files in closed rooms.

9. HOW FIDE PROCESSES DATA

FIDE processes data in automatic and manual ways:

- Automatic processes include publication in FIDE website of the first level information, rating calculation, putting inactive flag, and statistical outputs on rating variation, national/continental rankings and enquires inside the database on any index. Automatic processes are made by computer programs which operate on the database.
- Manual processes include any edit or change to single data, or any variation upon single application, or exchanging federation, merge, separate, delete and add single records, exporting lists of players and results, downloading rating lists. Manual processes include also any kind of search and enquiry of the database directly performed by any FIDE website visitor or operator.

10. SPECIAL PROCESSES CONNECTED TO SPECIAL OBLIGATIONS (DOPING AND CHEATING PREVENTION)

FIDE Medical Commission and FIDE Fair Play Commission performs special processes connected to doping and cheating prevention in sport.

Special processes are necessary in order to maintain FIDE integrity as a global sport organization and as a part of the obligations FIDE has got, being recognized by the IOC and member of the WADA.

Special processes connected to these purposes includes personal data collected during the process itself and/or anti-doping or anti-cheating investigations.

Personal or sensitive data are acquired only directly from the owner and subject to maximum level of confidentiality.

They are stored in the computers in use to both the chairmen and the secretaries of the relevant Commissions, in respect of their mission.

Only member of the relevant commissions can be granted access to that kind of data and only if it necessary to perform test or investigations.

The Commissions may acquire information and consultations from external consultants who have no access to names and any other element, which can lead to anyone's identification.

FIDE Medical Commission, as a part of anti-doping process, enters data and hold them through WADA's ADAMS platform, which is encrypted and safeguarded through passport access.

11. LEVEL OF DATA PUBLICATION

Data stored on FRS can be seen and displayed at different level in FIDE public website or through private access.

- Any visitor of FIDE website may see: Name, Surname, Year of birth, Federation, Gender (M or F), rating, title and inactivity flag, history of games of any person included in FRS.
- Any visitor of FIDE website may see also: email address, physical address, phone number and place and full birthday of any person who applied for a title and put voluntarily those data on the application form.
- Any visitor of FIDE website may see also: email address, physical address, phone number of any Federations' official included in the directory.
- National Rating Officers or the people designated by National Federations have full access to all the records of the players of their Federation, including all the abovementioned information.
- The personnel of EFO have full access to all the records of the database, including all the abovementioned information and the full history of data editing.

People who has full access to any information are enlisted in FIDE directory under the pages of any specific Federation (Rating Officer/General Secretary) and Elista Office.

All these people agrees to a non-disclosure policy on the data they can put or see from FRS.

12. PROFILE

FIDE profiles data in order to make statistical outputs and results of world/continental/national results and rankings.

Under the section A of this policy regulations, data of those people who didn't give any specific consent are not used to be profiled for other purposes than sport statistic outputs.

13. DURATION

FIDE stores data without any term: your personal data will be stored until your decision them to be deleted, duly communicated as per point nr. 18.

The only case data are cancelled from the database is on request of the owner or his heirs. After cancellation, your data will be stored only for historical reasons in the tournament archives.

14. DATA TRANSFER

Your personal data are stored and protected in FIDE servers which are located in Germany. Backup copies are also stored in FIDE server in Russia.

Your personal data can be transferred:

- To any National Federation with restriction to data of their own individuals;
- To any FIDE internal body, committee or commission, and the members of them with no restrictions, officials and organs;
- To World Chess Events Ltd. (based in London – UK), up to the end of their contract, with restriction to data already displayed on FIDE website to any visitor of it, and only for organizational purposes;
- Developers of FIDE website only in order to test and improve FIDE website functionalities;

Due to the fact data can be transferred to any internal body, committee or commission, officials and organs, they can be sent in any country whose members are included in FIDE directory.

15. DISCLOSURE

FIDE is not disclosing data to any kind of company, body or individual for commercial purposes, nor it is profiling anyone for such goals.

16. DATA SECURITY

FRS access is password protected and has password restore utility. FRS users can change their passwords and they are not disclosed to anyone.

Part of FRS which access is restricted to EFO is closed for access by firewall IP access limit, webserver IP access limit and username/password. FIDE also uses firewall blocking for database and servers, which

access is restricted to EFO IP.

FIDE webserver is protected from attack blocking (URL injections, DDos attacks) and performs regular security audits for vulnerabilities.

Backups of main database are done daily and stored on remote machines, which are located in Russia and Germany.

Any personal data included in FRS is encrypted.

17. YOUR RIGHTS

You have anytime the right to:

- A. Check the existence of your data in FIDE databases;
 - B. Request from FIDE access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability;
 - C. Withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - D. Lodge a complaint with a supervisory authority;
 - E. Check the origin from which the personal data belong, and if applicable, whether it came from publicly accessible sources;
 - F. Know the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- Actions under point A can be performed directly by any individual by checking in FRS from the public access in FIDE website.
 - Actions under point B and C shall come through a National Federation. In case a National Federation is refusing to perform such actions or is not performing them in a deadline of 30 days, they can be taken directly by sending a signed letter to FIDE DPO at the abovementioned address, enclosing a copy of an official identity document and a valid email address.
FIDE Administration will notify the request by email and will proceed upon your confirmation.
 - Action under point D shall be taken according to any supervisory authority's own procedure (please refer to: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en?2nd-language=lt)
 - Actions under E and F can be taken directly by sending an email to privacy@FIDE.com, enclosing a copy of an official identity document and a valid email address.

18. DATA CANCELLATION

You have anytime the right to ask FIDE to delete your personal data from the database: by taking such an action you are aware that data cancellation from FRS prevents you to take part to any FIDE rated event.

This request shall come through a National Federation and it will be confirmed by itself.

In case a National Federation will refuse to ask the erasure of your data or will not do it in a deadline of 30 days, you can apply directly by sending a signed letter to FIDE DPO at the abovementioned address enclosing a copy of an official identity document and a valid email address.

FIDE Administration will notify the request by email and will proceed upon your confirmation.

After the cancellation, your data will be stored in historical reports of any played tournament or championship and title repository.

The already made processes based on previous consent shall be legal and lawful also after the withdrawn of the consent and/or the request of data erasure.

19. DATA BREACH

In case of a data breach FIDE will notify immediately the fact and act according to the provision of the regulations.

20. LEGAL OBLIGATIONS THROUGH ADMINISTRATIVE AUTHORITIES

If the following situations occur FIDE shares information with any entitled regulatory or administrative

National authority, police or judiciary:

- When a legal request is addressed to FIDE or FIDE believes in good faith to have the legal obligation to do that;
- When a Law or any judiciary orders FIDE to act in a specific way;
- When it is found that FIDE databases are used to make any breach of a Law or personal data inserted in FRS are found to be false, or there is clear danger of misuse of someone's personal data;
- If any entitled regulatory or administrative National authority asks FIDE to share any information for a legal reason, FIDE may store data even in case of withdrawn of consent in order to fulfil any requested action.

21. NOTIFICATIONS OF ANY CHANGE OF DATA PROTECTION POLICY

In case of any change of this data protection policy FIDE will personally notify to all members whose email address is stored in its database of the changes.

FIDE will also announce any change with special notices on its website.

Any change will be effective after 30 days from its announcement: meanwhile everyone has the right to ask his data to be restricted or erased with the consequences indicated under point nr. 7.

22. DISPUTES

Disputes not subjected to administrative or regulatory authorities shall be solved in Lausanne competent Court.

SECTION B: PREMIUM SERVICES ONLY FOR CHESS-ID PROGRAM SUBSCRIBERS

23. PURPOSE OF DATA COLLECTION

Only for Chess-ID subscribers, FIDE collects data, in addition to what already described under Section A, in a fair and transparent way also in order to give the subscribers the special services indicated in Chess-ID program portal.

These services may include advertisement for specific tournaments, promoting FIDE events and activities, promoting FIDE partners' products and services, giving news feed and putting in touch various people of the chess community.

24. LEGAL BASIS

For the purposes of Chess-ID special services, data are collected and processed only by legal agreement and in order to provide the services themselves.

FIDE processes data in a fair and legitimate way only if it is necessary to provide the services requested by the subscribers at the act of registering or in a following time.

25. HOW FIDE COLLECTS DATA – DATA COLLECTORS

For the purposes of Chess-ID special services, FIDE collects data only upon registration of the single user and upon his specific consent.

People younger than 16 years old are not allowed to share their data and put their consent to the premium services.

26. COLLECTED DATA

For any individual registering in Chess-ID portal, and in order to provide the specific services, FIDE collects: Name, Surname, Birthday, Federation, Gender (M or F), Elo, title, email address, physical addresses, phone numbers, geo-localised position, pictures.

When the portal management requires a confirmation about the abovementioned data, it may require a copy of an official identification document.

This data can only be provided directly from the single individual.

27. DATA COLLECTING ACTIVITY AND REFUSAL

Data collection is necessary in order to provide the special services of the Chess-ID portal. In case of refusal

to let your data, as indicated above, be processed by FIDE, the abovementioned premium services cannot be provided.

28. FORMAT OF STORAGE

Your data are only stored electronically.

The electronic data archives are stored in FIDE servers, which are located in Germany and Russia. Safety measures as described in point nr. 34 protects the electronic archives.

29. HOW FIDE PROCESSES DATA

For any individual registering in Chess-ID portal, FIDE processes data in automatic and manual ways:

- Automatic processes include profiling, advertising, sending news feeds and newsletters, providing events information and putting in touch with other people. Automatic processes are made by computer programs which operate on the database.
- Manual processes include any edit or change to single data, or any variation upon single application or any other process directly requested from the user.

30. LEVEL OF DATA PUBLICATION

Data stored in Chess-ID portal can be seen by any other member of Chess-ID portal according to your preferences.

Privacy preferences can be changed from the relevant tab.

31. PROFILE

FIDE profiles your data in order to provide you a personal experience of Chess-ID portal.

Hence FIDE processes your data about geographical position, Elo, title and game history and played tournaments in order to advice you in events, products, services of FIDE and its partners, and give you personalised information and news.

32. DURATION

FIDE stores data for Chess-ID portal until your decision them to be deleted, from the relevant tab.

33. DATA TRANSFER

Your personal data given to Chess-ID portal and upon specific consent can be transferred, according to your preferences:

- To any National Federation;
- To any FIDE internal body, committee or commission, and the members of them, officials and organs;
- To World Chess Events Ltd. (based in London – UK);
- Developers of FIDE website;
- FIDE commercial partners;
- Any other person who subscribed to Chess-ID portal.

34. DATA SECURITY

Chess-ID portal is password protected and has password restore utility. Users can change their passwords and they are not disclosed to anyone.

The portal is closed for access by username/password and passport utility from third party applications.

Chess-ID webserver is protected from attack blocking (URL injections, DDos attacks) and performs regular security audits for vulnerabilities.

Backups of main database are done daily and stored on remote machines, which are located in Russia and Germany.

Any personal data included in Chess-ID portal is encrypted.

35. YOUR RIGHTS

You have anytime the right to:

- G. Check the existence of your data in Chess-ID portal;
- H. Request from FIDE access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability;
- I. Withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- J. Lodge a complaint with a supervisory authority;
- K. Check the origin from which the personal data belong, and if applicable, whether it came from publicly accessible sources;
- L. Know the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Any action can be performed directly from the relevant privacy page of Chess-ID portal.

36. DATA CANCELLATION

You have anytime the right to ask FIDE to delete your personal data from the database of Chess-ID portal. Moreover, asking FIDE to be erased from FRS according to Section A, point nr. 18 lead to cancellation from Chess-ID portal.

By taking such an action you are aware that data cancellation from Chess-ID portal prevents you to get the relevant services of Chess-ID.

Any action can be performed directly from the relevant privacy page of Chess-ID portal.

37. DATA BREACH

In case of a data breach FIDE will notify immediately the fact and act according to the provision of the regulations.

38. LEGAL OBLIGATIONS THROUGH ADMINISTRATIVE AUTHORITIES

If the following situations occur FIDE shares information with any entitled regulatory or administrative National authority, police or judiciary:

- When a legal request is addressed to FIDE or FIDE believes in good faith to have the legal obligation to do that;
- When a Law or any judiciary orders FIDE to act in a specific way;
- When it is found that FIDE databases are used to make any breach of a Law or personal data inserted in Chess-ID portal are found to be false, or there is clear danger of misuse of someone's personal data;
- If any entitled regulatory or administrative National authority asks FIDE to share any information for a legal reason, FIDE may store data even in case of withdrawn of consent in order to fulfil any requested action.

39. NOTIFICATIONS OF ANY CHANGE OF DATA PROTECTION POLICY

In case of any change of this data protection policy FIDE will personally notify to all subscribers of Chess-ID portal.

40. DISPUTES

Disputes not subjected to administrative or regulatory authorities shall be solved in Lausanne competent Court.

FIDE RATING SYSTEM TERMS AND CONDITIONS

Dear RO/Officer

Be informed that on August 2019 Fide adopted its data protection policy pursuant to its obligations upon national and international Laws protecting privacy.

The policy is available here following and it is also published on FIDE website.

When accessing and operating on Fide Rating System you process personal data such as name, gender, emails, birthdays and others.

Thus, you are fully involved in FIDE data protection policy and must respect its protection standards and all the following obligations:

- A. You are required to read and accept FIDE data protection policy: by ticking “*I agree*” you assume on yourself all the obligations and relevant responsibilities coming from this policy.
- B. You are required to operate on FRS only for the purposes of FRS and your role as Rating Officer/Officer: by ticking “*I agree*” you assume on yourself the commitment to operate in a legitimate way only to let FRS properly function and not for other or personal purposes;
- C. You are required to keep secret and safe all the information you acquire from FRS: sharing data or disclosing information you acquired from FRS is totally forbidden and may lead to your ban from using FRS;
- D. You are required to insert in FRS personal data only upon specific consent released by the owner: by inserting personal data in FRS you take yourself the responsibility of the given consent. FIDE assumes that national Federations process data in a way fully compliant with the Laws of the relevant countries and FIDE data protection policy.
Please, be informed that any new record will be notified to the owner.
- E. You are required to insert in FRS only true data with specific concern to e-mails which must be personally given by the player or his/her legal representative and must be of the player or his/her legal representative.
- F. You will be considered legally responsible of any breach of this policy: in case there were evidences, of any kind of misuse of FRS and that you broke any Law or FIDE data protection policy, entered false data or unauthorized data, **you will be considered liable for it and FIDE reserves the right to charge the responsible in any relevant Court** to claim for damages.
- G. You are invited to read the following data protection policy and commit yourself to respect it in any point:

=====

In order to perform its aims to be the supreme body responsible for the sport of chess and give National Federations, players and any other individual the services FIDE is intended to give as they are listed in the Statutes, it needs to collect, store and process personal data.

FIDE cares that the data are handled in a fair and transparent way and makes all the necessary efforts to enforce this goals.

1. DATA CONTROLLER, REPRESENTATIVE, DPO, DATA PROTECTION COMMITTEE

Data Controller:

FIDE – Federation Internationale des Echecs, whose legal seat is Avenue de Rhodanie 54 – 1007 Lausanne,

Switzerland.

Current legal representative is its President Mr. Arkady Dvorkovich.

As per decision Q2PB/2019/11 FIDE designated the following officials:

Data Protection Committee:

Mr Willy Iclicki (BEL): Data Protection Officer;

Mr Marco Biagioli (ITA): Data Protection Legal Advisor;

Mr Vladimir Kukaev (RUS): Data Protection Technical Advisor.

Data Protection Representative for the European Union:

Mr Willy Iclicki (BEL).

Data Protection Officer:

Mr Willy Iclicki (BEL).

2. CONTACTS

Data Protection Representative for the European Union and Data Protection Officer:

Mr Willy Iclicki (BEL) whose seat inside the European Union is Avenue du Globe 55 – Box 20 – 1190 Brussels, Belgium.

E-mail: privacy@FIDE.com

Data Protection Committee:

E-mail: privacy@FIDE.com

SECTION A: GENERAL PROVISIONS FOR ORDINARY DATA COLLECTION

3. PURPOSE OF DATA COLLECTION

FIDE collects data in a fair and transparent way only in order to let itself, its internal bodies and its services work.

The use and storage of the relevant data is necessary in order:

- to let FIDE internal bodies, boards, commissions and committees perform their duties according to the Statutes and the Regulations, as well as according to the relevant decisions on their goals;
- to let FIDE services, among which there are FIDE Rating System (FRS), FIDE titles and classification of players, arbiters, organizers, trainers and officials, properly function;
- to maintain the functionalities of FRS: like in any other sport, FRS is necessary to estimate the strength of the players and create a ranking of them to let any sport activity (championships, tournaments) be run in a fair way;
- to properly let FIDE to give titles according to the relevant Regulations;
- to let FIDE appoint people to any duty in its internal bodies or to any role in its events.

4. LEGAL BASIS

Data are collected and processed by legal agreement and in order to provide the services requested to FIDE itself.

FIDE processes data in a fair and legitimate way only if it is necessary for the abovementioned services to work properly: by participating to any FIDE rated event, as inserted in FRS by any National Federation, and by requesting any National Federation to issue a FIDE Identification Number (FIN), or by requesting FIDE to be included in the directory or any other list, you agree to the process, as indicated above.

5. HOW FIDE COLLECTS DATA – DATA COLLECTORS

FIDE collects data in several different ways:

- Data can be inserted in FRS by National Federations, directly.
In this case, FIDE notifies the insertion of the data in the system by sending an email to the

individual whose data were collected, hence he is informed that a National Federation inserted his data in FRS and might exert his rights.

- Data can be inserted in FRS by Elista FIDE Office (EFO), directly.
In this case, FIDE uploads and stores data only after having received an explicit consent by the individual whose data are going to be collected.
- Data can be sent by any individual himself, by sending an email to the Administration or manually registering in the FIDE website or connected services.

In this case, FIDE stores data only after having received an explicit request by the individual himself.

In all the abovementioned cases, for underage people (in the country they are citizens of) consents are given or requests are made by their legal tutors and confirmed by the individuals themselves after the majority.

6. COLLECTED DATA

FIDE collects different data according to the level as mentioned here following:

- For any individual included in FRS and any other individual to whom FIDE issues a FIN: Name, Surname, Birthday, Federation, Gender (M or F), email address.
When the Administration requires a confirmation about the abovementioned data, it may require a copy of an official identification document.
This data are ordinarily submitted by National Federations and notified to the single individual as per point nr. 5.
- For people receiving prizemoney or refunds directly from FIDE, it also collects physical addresses, phone numbers and bank details and local taxes details.
This data are ordinarily provided directly from the single individual.
- For officials, organs, and people permanently or temporarily involved in the Administration FIDE also collects a second email address, physical addresses, phone numbers and bank details.
This data are ordinarily provided directly from the single individual.
- For people applying for titles or exchange of Federation FIDE also collects physical addresses, phone numbers, place of birth and nationality.
This data are provided from the single individual through his National Federation.
- In case of stipulation of specific contracts, additional data may be required for specific purposes and upon specific consent.
This data are provided directly from the single individual.
- For FIDE employees, FIDE also collects tax details, and social insurance number/details and any other data required by national authorities upon a legal obligation.
This data are provided directly from the single individual.

FRS may host a picture of anyone who is recorded in the database.

Underage people photos are not displayed in any case until they reach the majority, unless it is sent personally by their legal tutors.

Photos about any other person included in FRS are displayed only upon his or his Federation request addressed to FIDE offices.

In case that FIDE suspects the request needs to be confirmed, may ask the owner to confirm his willing his picture to be displayed on FRS.

Photos taken during sport public events has not such restrictions.

7. DATA COLLECTING ACTIVITY AND REFUSAL

Data collection is necessary in order to achieve the purposes and complete the activities above indicated.

In case of refusal to let your data, as indicated above, be processed by FIDE, the abovementioned activities shall be impossible.

Thus, in case of refusal, the following consequences shall occur:

- For any individual to be included in FRS and any other individual requiring a FIN, refusal prevents that individual to be included in FRS and take part to any chess event;
- For people entitled to receive a prizemoney or refunds directly from FIDE, refusal prevents FIDE to make any payment.

- For officials, organs, and people permanently or temporarily involved in the Administration, refusal of data policy as mentioned in their contract or appointment letter, prevents FIDE to include the name in the directory and the appointment to progress.
- For people applying for titles or exchange of Federation, refusal prevents FIDE to process their application.
- In case of stipulation of specific contracts which require additional data, refusal prevents the contract to be concluded.
- For people applying for a job, refusal prevents FIDE to sign the contract.

8. FORMAT OF STORAGE

Your data are stored electronically and in paper.

The electronic data archives are stored in FIDE servers, which are located in Germany and Russia. Safety measures as described in point nr. 16 protects the electronic archives.

The paper archive is stored in Lausanne, at the FIDE main office, in classified files in closed rooms.

9. HOW FIDE PROCESSES DATA

FIDE processes data in automatic and manual ways:

- Automatic processes include publication in FIDE website of the first level information, rating calculation, putting inactive flag, and statistical outputs on rating variation, national/continental rankings and enquires inside the database on any index. Automatic processes are made by computer programs which operate on the database.
- Manual processes include any edit or change to single data, or any variation upon single application, or exchanging federation, merge, separate, delete and add single records, exporting lists of players and results, downloading rating lists. Manual processes include also any kind of search and enquiry of the database directly performed by any FIDE website visitor or operator.

10. SPECIAL PROCESSES CONNECTED TO SPECIAL OBLIGATIONS (DOPING AND CHEATING PREVENTION)

FIDE Medical Commission and FIDE Fair Play Commission performs special processes connected to doping and cheating prevention in sport.

Special processes are necessary in order to maintain FIDE integrity as a global sport organization and as a part of the obligations FIDE has got, being recognized by the IOC and member of the WADA.

Special processes connected to these purposes includes personal data collected during the process itself and/or anti-doping or anti-cheating investigations.

Personal or sensitive data are acquired only directly from the owner and subject to maximum level of confidentiality.

They are stored in the computers in use to both the chairmen and the secretaries of the relevant Commissions, in respect of their mission.

Only member of the relevant commissions can be granted access to that kind of data and only if it necessary to perform test or investigations.

The Commissions may acquire information and consultations from external consultants who have no access to names and any other element, which can lead to anyone's identification.

FIDE Medical Commission, as a part of anti-doping process, enters data and hold them through WADA's ADAMS platform, which is encrypted and safeguarded through passport access.

11. LEVEL OF DATA PUBLICATION

Data stored on FRS can be seen and displayed at different level in FIDE public website or through private access.

- Any visitor of FIDE website may see: Name, Surname, Year of birth, Federation, Gender (M or F), rating, title and inactivity flag, history of games of any person included in FRS.
- Any visitor of FIDE website may see also: email address, physical address, phone number and place and full birthday of any person who applied for a title and put voluntarily those data on the application form.

- Any visitor of FIDE website may see also: email address, physical address, phone number of any Federations' official included in the directory.
- National Rating Officers or the people designated by National Federations have full access to all the records of the players of their Federation, including all the abovementioned information.
- The personnel of EFO have full access to all the records of the database, including all the abovementioned information and the full history of data editing.

People who has full access to any information are enlisted in FIDE directory under the pages of any specific Federation (Rating Officer/General Secretary) and Elista Office.

All these people agrees to a non-disclosure policy on the data they can put or see from FRS.

12. PROFILE

FIDE profiles data in order to make statistical outputs and results of world/continental/national results and rankings.

Under the section A of this policy regulations, data of those people who didn't give any specific consent are not used to be profiled for other purposes than sport statistic outputs.

13. DURATION

FIDE stores data without any term: your personal data will be stored until your decision them to be deleted, duly communicated as per point nr. 18.

The only case data are cancelled from the database is on request of the owner or his heirs. After cancellation, your data will be stored only for historical reasons in the tournament archives.

14. DATA TRANSFER

Your personal data are stored and protected in FIDE servers which are located in Germany. Backup copies are also stored in FIDE server in Russia.

Your personal data can be transferred:

- To any National Federation with restriction to data of their own individuals;
- To any FIDE internal body, committee or commission, and the members of them with no restrictions, officials and organs;
- To World Chess Events Ltd. (based in London – UK), up to the end of their contract, with restriction to data already displayed on FIDE website to any visitor of it, and only for organizational purposes;
- Developers of FIDE website only in order to test and improve FIDE website functionalities;

Due to the fact data can be transferred to any internal body, committee or commission, officials and organs, they can be sent in any country whose members are included in FIDE directory.

15. DISCLOSURE

FIDE is not disclosing data to any kind of company, body or individual for commercial purposes, nor it is profiling anyone for such goals.

16. DATA SECURITY

FRS access is password protected and has password restore utility. FRS users can change their passwords and they are not disclosed to anyone.

Part of FRS which access is restricted to EFO is closed for access by firewall IP access limit, webserver IP access limit and username/password. FIDE also uses firewall blocking for database and servers, which access is restricted to EFO IP.

FIDE webserver is protected from attack blocking (URL injections, DDos attacks) and performs regular security audits for vulnerabilities.

Backups of main database are done daily and stored on remote machines, which are located in Russia and Germany.

Any personal data included in FRS is encrypted.

17. YOUR RIGHTS

You have anytime the right to:

- A. Check the existence of your data in FIDE databases;
 - B. Request from FIDE access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability;
 - C. Withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - D. Lodge a complaint with a supervisory authority;
 - E. Check the origin from which the personal data belong, and if applicable, whether it came from publicly accessible sources;
 - F. Know the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- Actions under point A can be performed directly by any individual by checking in FRS from the public access in FIDE website.
 - Actions under point B and C shall come through a National Federation. In case a National Federation is refusing to perform such actions or is not performing them in a deadline of 30 days, they can be taken directly by sending a signed letter to FIDE DPO at the abovementioned address, enclosing a copy of an official identity document and a valid email address. FIDE Administration will notify the request by email and will proceed upon your confirmation.
 - Action under point D shall be taken according to any supervisory authority's own procedure (please refer to: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en?2nd-language=lt)
 - Actions under E and F can be taken directly by sending an email to privacy@FIDE.com, enclosing a copy of an official identity document and a valid email address.

18. DATA CANCELLATION

You have anytime the right to ask FIDE to delete your personal data from the database: by taking such an action you are aware that data cancellation from FRS prevents you to take part to any FIDE rated event.

This request shall come through a National Federation and it will be confirmed by itself.

In case a National Federation will refuse to ask the erasure of your data or will not do it in a deadline of 30 days, you can apply directly by sending a signed letter to FIDE DPO at the abovementioned address enclosing a copy of an official identity document and a valid email address.

FIDE Administration will notify the request by email and will proceed upon your confirmation.

After the cancellation, your data will be stored in historical reports of any played tournament or championship and title repository.

The already made processes based on previous consent shall be legal and lawful also after the withdrawn of the consent and/or the request of data erasure.

19. DATA BREACH

In case of a data breach FIDE will notify immediately the fact and act according to the provision of the regulations.

20. LEGAL OBLIGATIONS THROUGH ADMINISTRATIVE AUTHORITIES

If the following situations occur FIDE shares information with any entitled regulatory or administrative National authority, police or judiciary:

- When a legal request is addressed to FIDE or FIDE believes in good faith to have the legal obligation to do that;
- When a Law or any judiciary orders FIDE to act in a specific way;
- When it is found that FIDE databases are used to make any breach of a Law or personal data inserted in FRS are found to be false, or there is clear danger of misuse of someone's personal data;
- If any entitled regulatory or administrative National authority asks FIDE to share any information for a legal reason, FIDE may store data even in case of withdrawn of consent in order to fulfil any requested action.

21. NOTIFICATIONS OF ANY CHANGE OF DATA PROTECTION POLICY

In case of any change of this data protection policy FIDE will personally notify to all members whose email address is stored in its database of the changes.

FIDE will also announce any change with special notices on its website.

Any change will be effective after 30 days from its announcement: meanwhile everyone has the right to ask his data to be restricted or erased with the consequences indicated under point nr. 7.

22. DISPUTES

Disputes not subjected to administrative or regulatory authorities shall be solved in Lausanne competent Court.

SECTION B: PREMIUM SERVICES ONLY FOR CHESS-ID PROGRAM SUBSCRIBERS

23. PURPOSE OF DATA COLLECTION

Only for Chess-ID subscribers, FIDE collects data, in addition to what already described under Section A, in a fair and transparent way also in order to give the subscribers the special services indicated in Chess-ID program portal.

These services may include advertisement for specific tournaments, promoting FIDE events and activities, promoting FIDE partners' products and services, giving news feed and putting in touch various people of the chess community.

24. LEGAL BASIS

For the purposes of Chess-ID special services, data are collected and processed only by legal agreement and in order to provide the services themselves.

FIDE processes data in a fair and legitimate way only if it is necessary to provide the services requested by the subscribers at the act of registering or in a following time.

25. HOW FIDE COLLECTS DATA – DATA COLLECTORS

For the purposes of Chess-ID special services, FIDE collects data only upon registration of the single user and upon his specific consent.

People younger than 16 years old are not allowed to share their data and put their consent to the premium services.

26. COLLECTED DATA

For any individual registering in Chess-ID portal, and in order to provide the specific services, FIDE collects: Name, Surname, Birthday, Federation, Gender (M or F), Elo, title, email address, physical addresses, phone numbers, geo-localised position, pictures.

When the portal management requires a confirmation about the abovementioned data, it may require a copy of an official identification document.

This data can only be provided directly from the single individual.

27. DATA COLLECTING ACTIVITY AND REFUSAL

Data collection is necessary in order to provide the special services of the Chess-ID portal. In case of refusal to let your data, as indicated above, be processed by FIDE, the abovementioned premium services cannot be provided.

28. FORMAT OF STORAGE

Your data are only stored electronically.

The electronic data archives are stored in FIDE servers, which are located in Germany and Russia. Safety measures as described in point nr. 34 protects the electronic archives.

29. HOW FIDE PROCESSES DATA

For any individual registering in Chess-ID portal, FIDE processes data in automatic and manual ways:

- Automatic processes include profiling, advertising, sending news feeds and newsletters, providing events information and putting in touch with other people. Automatic processes are made by computer programs which operate on the database.
- Manual processes include any edit or change to single data, or any variation upon single application or any other process directly requested from the user.

30. LEVEL OF DATA PUBLICATION

Data stored in Chess-ID portal can be seen by any other member of Chess-ID portal according to your preferences.

Privacy preferences can be changed from the relevant tab.

31. PROFILE

FIDE profiles your data in order to provide you a personal experience of Chess-ID portal.

Hence FIDE processes your data about geographical position, Elo, title and game history and played tournaments in order to advice you in events, products, services of FIDE and its partners, and give you personalised information and news.

32. DURATION

FIDE stores data for Chess-ID portal until your decision them to be deleted, from the relevant tab.

33. DATA TRANSFER

Your personal data given to Chess-ID portal and upon specific consent can be transferred, according to your preferences:

- To any National Federation;
- To any FIDE internal body, committee or commission, and the members of them, officials and organs;
- To World Chess Events Ltd. (based in London – UK);
- Developers of FIDE website;
- FIDE commercial partners;
- Any other person who subscribed to Chess-ID portal.

34. DATA SECURITY

Chess-ID portal is password protected and has password restore utility. Users can change their passwords and they are not disclosed to anyone.

The portal is closed for access by username/password and passport utility from third party applications.

Chess-ID webserver is protected from attack blocking (URL injections, DDos attacks) and performs regular security audits for vulnerabilities.

Backups of main database are done daily and stored on remote machines, which are located in Russia and Germany.

Any personal data included in Chess-ID portal is encrypted.

35. YOUR RIGHTS

You have anytime the right to:

- G. Check the existence of your data in Chess-ID portal;
- H. Request from FIDE access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability;
- I. Withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- J. Lodge a complaint with a supervisory authority;
- K. Check the origin from which the personal data belong, and if applicable, whether it came from publicly accessible sources;

- L. Know the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Any action can be performed directly from the relevant privacy page of Chess-ID portal.

36. DATA CANCELLATION

You have anytime the right to ask FIDE to delete your personal data from the database of Chess-ID portal. Moreover, asking FIDE to be erased from FRS according to Section A, point nr. 18 lead to cancellation from Chess-ID portal.

By taking such an action you are aware that data cancellation from Chess-ID portal prevents you to get the relevant services of Chess-ID.

Any action can be performed directly from the relevant privacy page of Chess-ID portal.

37. DATA BREACH

In case of a data breach FIDE will notify immediately the fact and act according to the provision of the regulations.

38. LEGAL OBLIGATIONS THROUGH ADMINISTRATIVE AUTHORITIES

If the following situations occur FIDE shares information with any entitled regulatory or administrative National authority, police or judiciary:

- When a legal request is addressed to FIDE or FIDE believes in good faith to have the legal obligation to do that;
- When a Law or any judiciary orders FIDE to act in a specific way;
- When it is found that FIDE databases are used to make any breach of a Law or personal data inserted in Chess-ID portal are found to be false, or there is clear danger of misuse of someone's personal data;
- If any entitled regulatory or administrative National authority asks FIDE to share any information for a legal reason, FIDE may store data even in case of withdrawn of consent in order to fulfil any requested action.

39. NOTIFICATIONS OF ANY CHANGE OF DATA PROTECTION POLICY

In case of any change of this data protection policy FIDE will personally notify to all subscribers of Chess-ID portal.

40. DISPUTES

Disputes not subjected to administrative or regulatory authorities shall be solved in Lausanne competent Court.



FÉDÉRATION INTERNATIONALE DES ÉCHECS

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www.fide.com

To: FIDE President, FIDE Management Board, FIDE Presidential Board (Budapest - September)

Subject: Data Protection Committee activities

First Report

1. ESTABLISHMENT

The Data Protection Committee has been established as per decision Q2PB/2019/11 of the Second Quarter Presidential Board in Baku.

2. FIRST MEETING

On July 8th – 9th the Committee held its first meeting in Lausanne where it made the scheduled of the actions to be taken and collected from Technical Advisor and Elista Office administrator Vladimir Kukaev the necessary information.

The minutes of the meeting were delivered to FIDE MB and are here attached ([annex 01](#)).

3. ACTIVITIES ALREADY COMPLETED

- A new email address (privacy@fide.com) has been established to send official communication about data protection;
- All the Commissions have been questioned on how they deal currently with personal data in order either to build a proper policy, either to suggest them amendments for them to be compliant with all the relevant obligations towards the Laws and FIDE own policy;
- ARB, DIS, EDU, ETH, EVE, FPL, GSC, MED, OLC, PDC, QC, SC, SPP, TEC, TRG, VER and WOM gave their response and they have been considered for the abovementioned purposes;
- The Data Protection Policy has been written considering also future projects (Chess-ID) which will be totally compliant ([annex 02](#));
- DPLA advised QC for the questionnaires about time limit for a game to be rated;
- DPLA also joined a meeting of ARB in order to advise on how to deal with personal data for future projects. The ARB Chairman and DPLA agreed on keeping in touch step by step;
- FRS welcome page with term and conditions has been created in order to inform ROs on their obligations about data protection ([annex 03](#)). The liability of the ROs is hence clearly explained towards FIDE and single individuals;
- FRS data is going to be totally encrypted to gran more safety by mid-september.



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4. NEXT STEPS TO BE IMPLEMENTED

- Notification program to people included in the FRS of being included in that with instructions on how to ask data cancellation and consequences of that through official notices on FIDE website to be published after PB approval of the present report,
- Notification program to all national federations and continents about their obligation towards European Union citizens OR Foreign citizens living in the European Union;
- Implement FIDE rating system in order to design an automated system of emails to be sent to a FIN holder in the time the FIN is created and test it: this may require a major cooperation from QC and more strict instructions for National ROs;
- Proceed with the extraordinary program.

5. CONCLUSIONS

Step 1 and Step 2 of the extraordinary program approved by the Presidential Board in Baku have been completed.

Step 3.3 is currently in progress.

The program is progressing properly.

Annexes:

- 01 – minutes of the first meeting;
- 02 – privacy policy.
- 03 – terms and conditions for ROs to use FRS.

Venice – Lausanne, today 25th August, 2019

Faithfully

Mr Willy Iclicki (BEL): Data Protection Officer;
Mr Marco Biagioli (ITA): Data Protection Legal Advisor;
Mr Vladimir Kukaev (RUS): Data Protection Technical Advisor.



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To: FIDE President, FIDE Management Board

Subject: Data Protection Committee activities

Second Report

1. ACTIVITIES COMPLETED SINCE THE LAST PRESIDENTIAL BOARD

- Daily issues coming from the players and other people registered in FRS are solved. No request have been answered in more than 72 hours;
- The Committee has started to work on handbook attachments review, in order to rewrite them as to be compliant to the Laws and FIDE own policy;
- By this reason, DPLA proposed some amendments and questioned ARB, EVE, FPL, QC and SPP in order to coordinate the efforts and build forms which either can be compliant and either useful for the purpose of the commissions;
- A full proposal will be submitted by January 15th for the agenda of EGA in Abu Dhabi.

2. REQUESTS TO THE BOARD

In order FIDE to be fully compliant two important steps have to be taken which require a decision from the Head of FIDE Administration:

2.1 Put a regulation about disclosing people birth year in the FIDE web-profile.

In general, FIDE would require a specific consent before publishing people's birthday or year, since this information is mostly unnecessary (or at least it is unnecessary it to be known in public), but given that this information was already displayed, legally, before the Law was enforced, it is even possible to erase only the birth year of people making one specific request.

The Committee has already received several requests on this topic.

This would require only one amendment to FIDE privacy policy, which can be accepted directly by a MB meeting and republished on FIDE website.

The procedure can be the same for data deletion, through Chess Federations, which is working fine, or even an easier one, but this is one operational detail.

The real issue, so far, is the downloadable rating list, from which the birth year cannot be deleted at all: the working of the system actually requires it.

Such a problem can be solved putting the downloadable list in a private area giving access to them only to some entitled people (the list is required mainly for arbiters and organisers: the public wouldn't even



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understands many of the fields). In order to perform this action, some technical arrangement will be necessary.

But first, a decision by MB is required in order to:

- Allow people who want to delete their birthday to do it;
- Move the downloadable rating lists to a private area asking arbiters and organisers who want to download it to register to FIDE website accepting specific terms and conditions.

2.2 Request Federations to use in a proper way the FIDE rating system

At the moment, no one knows when and by whom his data are put by one Rating Officer in FRS.

The ideal system would be to send one confirmation email but this may affect tournaments to be rated because the rating officer would be subject to wait one email from the player which eventually could not arrive at all.

But, it is possible to send only one notification email and then the owner is free to perform the cancellation process if he doesn't agree with the policy. This arrangement is technically pretty possible. Moreover, FRS already has a field "email".

Unfortunately, many Federations don't put anything in that field (as you can even leave it blank without stopping the registration process) or put some fake address not to bother to ask players a valid email.

What is required is some official statement on the matter in order to be sure every RO will act correctly.

Hence, a decision by MB is required in order to:

- Send a circular letter informing Federations they are obliged to fill the FRS fields correctly and put the field "email" as obligatory and also taking penalties in case the address is found not to be real.

The actions mentioned in 2.1 and 2.2 imply many technical arrangements and some issues which can be solved by the Committee and Mr Kukaev.

At your disposal for any clarification, and in person if required.

3. CONCLUSIONS

The program is progressing properly.

Venice – Lausanne, dated today 16th December, 2019

Mr Willy Iclicki (BEL): Data Protection Officer;

Mr Marco Biagioli (ITA): Data Protection Legal Advisor;

Mr Vladimir Kukaev (RUS): Data Protection Technical Advisor.



FÉDÉRATION INTERNATIONALE DES ÉCHECS

Recognized by the International Olympic Committee
Avenue de Rhodanie 54 - 1007 Lausanne, Switzerland, Tel: + (41)21 6010039
Athens office: 9 Syggrou Ave., 11743 Athens, Greece
Tel.: (+30) 210 9212047, Email: office@fide.com
www.fide.com

To: FIDE President, FIDE Management Board

Subject: Data Protection Committee proposals

Proposal of actions to be taken

1. CHANGE ON FIDE HANDBOOK B.03 1.10

Current wording: *“FIDE Players' database stores the following data for each player: First name, last name, gender, date of birth, place of birth, nationality, the Federation they represent, a player's photo and a valid email address for contact purposes”.*

Proposed new wording (new text in green): *“FIDE Players' database stores the following data for each player: First name, last name, gender, date of birth, place of birth, nationality, the Federation they represent, a player's photo and a valid email address for contact purposes. All fields except the photo are mandatory in order a registration to be successful; whether a field is incorrectly filled FIDE rating system doesn't allow the registration to end successfully”.*

Explanation: now it is possible to have a successful registration also without imputing all the data. This amendment is required to block the registration process if the fields are not input properly.

2. ADD. FIDE HANDBOOK B.03 1.10.1

Proposed new article 1.10.1: *“According to FIDE Data Protection Policy only first name, last name, gender, year of birth, the Federation one represents, FIDE ID and titles are displayed in a player's public web-profile. However, a player may ask his year of birth and gender to be hidden, according to the procedure established by FIDE Data Protection Policy”.*

Explanation: it is necessary to give a player the possibility to hide (not cancel, but hide from the public area, some information that are not strictly necessary but may create privacy issues. Data Protection is receiving many requests on this matter and we need a regulation on how to proceed.

3. CHANGE ON FIDE HANDBOOK B.03 1.13.1

Current wording: *“National Rating Officers can register new players associated with their own National Federation and 'FIDE flag players’”.*

Proposed new wording (new text in green): *“National Rating Officers can register new players associated with their own National Federation and 'FIDE flag players’. When registering a player, the National Rating Officer is required to fill properly and correctly the required fields as well as to respect FIDE Data Protection Policy”.*

Explanation: there must be some sort of liability on NRO activity, as FIDE is exposed to their misuse of the



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FRS.

4. CHANGE ON FIDE HANDBOOK B.03 1.18

Current wording: *“Players already registered may have missing data. FIDE encourages the players themselves, the National Rating Officers and Chess Officials to fill these data to whatever extent this is possible by communicating with the FIDE Rating Administrator”.*

Proposed new wording (old text in red, new text in green): *“Players already registered may have missing data. ~~FIDE encourages the players themselves, the National Rating Officers and Chess Officials to fill these data to whatever extent this is possible by communicating with the FIDE Rating Administrator.~~ Starting from Jan. 1st 2020 the FIDE Rating Administrator will send to the National Rating Officers a list of uncompleted records requiring either to complete, either to delist the records where obligatory data are not filled”*

5. ADD FIDE HANDBOOK B.03 1.18.1

Proposed new article 1.18.1: *“National Ratings Officers will be required to answer to the requests of the Rating Administrator according to 1.18 within 6 months. After this deadline, the Rating Administrator will send a second request with a second 6-months deadline. If the second deadline is not respected, inactive players with uncompleted data will be delisted by the Rating Administrator”.*

Explanation (point 4. and 5.): many players are inactive and their records will never be completed, hence is better to delist them in order to fulfil the legal obligation to have correct data in the database. This is necessary especially in order to have valid email addresses, which are actually extremely required.

6. ADD FIDE HANDBOOK B.03 NEW CHAPTER 4 (THE NATIONAL RATING OFFICER) WITH FOLLOWING ARTICLES

Proposed new article 4.1: *“The National Rating Officer is responsible for imputing data correctly in the FIDE Rating System”.*

Proposed new article 4.2: *“Whenever is found the National Rating Officer input incorrect data, the relevant Chess Federation is fined of an amount of CHF 50,00 for any single wrong data input after July 1st 2020. The National Chess Federation may charge the player if it was found the incorrect data were given on his fault. Anyway, article 1.14.1 applies”.*

Proposed new article 4.3: *“The FIDE Rating Administrator may delist a player if it was found his data are false and the National Rating Officer fails to provide the true ones in a reasonable time. Anyway, article 1.14.1 applies”.*



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Explanation: it has been noted that, unfortunately, many Rating Officers are not acting properly nor their intention is to use correctly FRS. Hence there is the need of putting some penalty in order to push them to use properly the system.

National Rating Officers fails to put data in a correct way may lead to FIDE liability, as the system is the property of FIDE.

7. ADD FIDE HANDBOOK B.02 7.3

Proposed new article 7.3: *“Starting from Jan. 1st 2020 the rating lists will be free to download only by National Rating Officers and FIDE website users registered as licensed arbiters or organisers”.*

Explanation: the rating list contains many data people would not like to be displayed, including year of birth we are allowing them not to be displayed in public. There is need that only people who need the list to handle a tournament be allowed to download it.

8. FINAL DECISIONS

Proposed final decision n. 1: when these proposals are passed by PB, allow Data Protection Committee to update directly FIDE Data Protection Policy according to the approved changes.

Proposed final decision n. 2: when these proposals are passed by PB, allow the Rating Administrator to make the necessary changes to FRS within two weeks.

Proposed final decision n. 3: when these proposals are passed by PB, allow FIDE Secretariat to publish a newsfeed on FIDE website and FIDE socials.

Proposed final decision n. 4: when these proposals are passed by PB, allow FIDE Secretariat to send a specific notification email to any Chess Federation or affiliated organization.

At your disposal for any clarification, and in person if required.

Venice – Lausanne, dated today 26th December, 2019

Mr Willy Iclicki (BEL): Data Protection Officer;

Mr Marco Biagioli (ITA): Data Protection Legal Advisor;

Mr Vladimir Kukaev (RUS): Data Protection Technical Advisor.

FIDE Event:

Organiser:

Federation:

International Organiser's contact info (provide one valid email address):

(Probable) City:

Proposed dates of Arrival:

Departure:

Financial guarantee:
Declaration and/or Government
Guarantee if applicable.
Provisional budget to be added.

Declaration generally assuring visas
To representatives of all federations:

Exceptions, if any, and reasons:

Name of Meeting/Tournament hall
And its distance from accommodation:

Travel connections and reductions for
Participants officials and accompanying persons:

Accommodation and meals of participants
And for accompanying persons:
(give classification of hotels and meals.
Indicate number of persons per room).

Are there:

Press facilities: Telephones: Telefax: E-mail:

Secretarial Staff (Indicate languages).

Simultaneous Translation (in case of meeting):
Will it be guaranteed in FIDE languages:
(Indicate languages)

FIDE standard chess equipment
(in case of a competition):

Additional arrangement/Prize Fund is applicable:

(GA 1996-2014) Deposit: We confirm that we shall pay the deposit fee below before conclusion of the General Assembly granting the option. We are aware that we forfeit this sum if for any reason we do not organise the event. If we do organise the event this sum will be put to the credit of our account with FIDE. We have recognised the specific FIDE stipulation for the above-mentioned event and will observe them.
PRIVACY NOTICE: by signing and submitting this form you confirm you have read and properly understood FIDE privacy policy available on FIDE website (<https://www.fide.com/privacy>) and you agree this form to be published on FIDE website according to the bidding procedure regulations, as well as the other relevant parts of the abovementioned policy.

Name of International Organiser:
Signature:

Place/Date:

(GA 2014) National support letter: We attach the support letter signed by either the President, the Chairman or the General Secretary of the national federation of the host country.

All conditions offered are subject to the approval of the FIDE President or his representative.



Anti-Cheating Commission – Tournament Complaint Form

Please fill in, scan and return to acc@fide.com in pdf format.

Complainant:¹ _____ Federation: _____

Physical address: _____

E-mail address: _____

Telephone number: _____

Respondent:² _____ Federation: _____

Physical address: _____

E-mail address: _____

Telephone number: _____

Brief description of facts:³ _____

Attachments:⁴ _____

PRIVACY NOTICE: by signing and submitting this form you confirm you have read and properly understood FIDE privacy policy available on the next page and you agree this form to be published on FIDE website and / or processed according to antichecking relevant regulations and FPC internal rules.

Date: _____

Complainant Signature _____

¹ Please include FIDE ID if applicable.

² Please include FIDE ID.

³ Please provide a brief account of why you think AC regulations have been breached by the respondent. Also provide exact details of the event(s) at which the alleged breach took part and the name of the Chief Organizer and Chief Arbitrator(s). You are recommended to provide a full description as a separate attachment to your own benefit.

⁴ Please list all the attachments that form part of your complaint. Please provide attachments in PDF format. Chess files should be provided in pgn format.

According to the FIDE Data Protection Policy and relevant Swiss Laws and International Rules and regulations, you are informed of the following:

1. DATA CONTROLLER, REPRESENTATIVE, DPO, DATA PROTECTION COMMITTEE

Data Controller:

FIDE – Federation Internationale des Echecs, whose legal seat is Avenue de Rhodanie 54 – 1007 Lausanne, Switzerland.

Current legal representative is its President Mr. Arkady Dvorkovich.

As per decision Q2PB/2019/11 FIDE designated the following officials:

Data Protection Committee:

Mr Willy Iclicki (BEL): Data Protection Officer;

Mr Marco Biagioli (ITA): Data Protection Legal Advisor;

Mr Vladimir Kukaev (RUS): Data Protection Technical Advisor.

Data Protection Representative for the European Union:

Mr Willy Iclicki (BEL).

Data Protection Officer:

Mr Willy Iclicki (BEL).

2. CONTACTS

Data Protection Representative for the European Union and Data Protection Officer:

Mr Willy Iclicki (BEL) whose seat inside the European Union is Avenue du Globe 55 – Box 20 – 1190 Brussels, Belgium.

E-mail: privacy@FIDE.com

Data Protection Committee:

E-mail: privacy@FIDE.com

3. PURPOSE OF DATA COLLECTION

FIDE collects the data required in this form in order to process your complaint and set up the proper investigations.

Data will be treated with automatic and manual processes in electronic archives and online repositories.

4. LEGAL BASIS

Data are collected and processed by your explicit request to FPC to investigate on your complaint, which you confirm by signing this form.

5. DATA COLLECTING ACTIVITY AND REFUSAL

Data collection is necessary in order to examine your complaint. In case of refusal to let your data, as indicated above, be processed by FIDE, the complaint will be disregarded.

6. FORMAT OF STORAGE

Your data are stored electronically and in paper.

The electronic data archives are stored in FIDE servers, which are located in Germany and Russia, and relevant Commissions' own databases.

Safety measures as described in point nr. 16 protect the electronic archives.

The paper archive is stored in Lausanne, at the FIDE main office, in classified files in closed rooms.

7. LEVEL OF DATA PUBLICATION

This application form will be published on FIDE website according to FIDE title regulation which can be found in FIDE Handbook.

8. PROFILE

FIDE profiles data of this application in order to make statistical outputs and mathematical investigations.

9. DURATION

FIDE stores data without any term: your personal data will be stored until your decision that they should be deleted, duly communicated as per FIDE Data Protection Policy point nr. 18.

10. DATA TRANSFER

Your personal data are stored and protected in FIDE servers which are located in Germany and relevant Commissions' own database. Backup copies are also stored in FIDE server in Russia. Your personal data can be transferred:

- To any National Federation with restriction to data of their own individuals;
- To any FIDE internal body, committee or commission, and the members of them with no restrictions, officials and organs;
- Developers of FIDE website only in order to test and improve FIDE website functionalities;

Due to the fact data can be transferred to any internal body, committee or commission, officials and organs, they can be sent in any country whose members are included in FIDE directory.

11. DISCLOSURE

FIDE is not disclosing data to any kind of company, body or individual for commercial purposes, nor is it profiling anyone for such goals.

12. DATA SECURITY

FIDE electronic archives are password protected and has password restore utility.

FIDE webserver is protected from attack blocking (URL injections, DDos attacks) and performs regular security audits for vulnerabilities.

Backups of main database are done daily and stored on remote machines, which are located in Russia and Germany.

13. YOUR RIGHTS

You have anytime the right to:

- A. Check the existence of your data in FIDE databases;
 - B. Request from FIDE access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability;
 - C. Withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - D. Lodge a complaint with a supervisory authority;
 - E. Know the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- Actions under point A can be performed directly by any individual by checking in FRS from the public access in FIDE website.
 - Actions under point B and C shall come through a National Federation. In case a National Federation is refusing to perform such actions or is not performing them in a deadline of 30 days, they can be taken directly by sending a signed letter to FIDE DPO at the abovementioned address, enclosing a copy of an official identity document and a valid email address. FIDE Administration will notify the request by email and will proceed upon your confirmation.
 - Action under point D shall be taken according to any supervisory authority's own procedure (please refer to: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en?2nd-language=it)
 - Actions under E and F can be taken directly by sending an email to privacy@FIDE.com, enclosing a copy of an official identity document and a valid email address.

DO YOU AGREE WITH THE ABOVEMENTIONED POLICY AND FIDE DATA PROTECTION POLICY (thick as appropriate)?

(YES)

(NO)

DATE _____

SIGNATURE _____



Anti-Cheating Commission – Post-Tournament Complaint Form

Please fill in, scan and return to acc@fide.com in pdf format.

Complainant:¹ _____ Federation: _____

Physical address: _____

E-mail address: _____

Telephone number: _____

Respondent:² _____ Federation: _____

Physical address: _____

E-mail address: _____

Telephone number: _____

Brief description of facts:³ _____

Engine check results:⁴ _____

Attachments:⁵ _____

PRIVACY NOTICE: by signing and submitting this form you confirm you have read and properly understood FIDE privacy policy available on the next page and you agree this form to be published on FIDE website and / or processed according to antichecking relevant regulations and FPC internal rules.

Date:

Complainant Signature

1 Please include FIDE ID if applicable.

2 Please include FIDE ID.

3 Please provide a brief account of why you think AC regulations have been breached by the respondent. Also provide exact details of the event(s) at which the alleged breach took part and the name of the Chief Organizer and Chief Arbitrator(s). You are recommended to provide a full description as a separate attachment to your own benefit.

4 Please provide details of software and hardware used and provide a synthetic description of findings. You are recommended to provide a full analysis as a separate attachment.

5 Please list all the attachments that form part of your complaint. Please provide attachments in PDF format. Chess files should be provided in pgn format.

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This application form will be published on FIDE website according to FIDE title regulation which can be found in FIDE Handbook.

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- To any FIDE internal body, committee or commission, and the members of them with no restrictions, officials and organs;
- Developers of FIDE website only in order to test and improve FIDE website functionalities;

Due to the fact data can be transferred to any internal body, committee or commission, officials and organs, they can be sent in any country whose members are included in FIDE directory.

11. DISCLOSURE

FIDE is not disclosing data to any kind of company, body or individual for commercial purposes, nor is it profiling anyone for such goals.

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FIDE electronic archives are password protected and has password restore utility.

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 - C. Withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - D. Lodge a complaint with a supervisory authority;
 - E. Know the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- Actions under point A can be performed directly by any individual by checking in FRS from the public access in FIDE website.
 - Actions under point B and C shall come through a National Federation. In case a National Federation is refusing to perform such actions or is not performing them in a deadline of 30 days, they can be taken directly by sending a signed letter to FIDE DPO at the abovementioned address, enclosing a copy of an official identity document and a valid email address. FIDE Administration will notify the request by email and will proceed upon your confirmation.
 - Action under point D shall be taken according to any supervisory authority's own procedure (please refer to: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en?2nd-language=it)
 - Actions under E and F can be taken directly by sending an email to privacy@FIDE.com, enclosing a copy of an official identity document and a valid email address.

DO YOU AGREE WITH THE ABOVEMENTIONED POLICY AND FIDE DATA PROTECTION POLICY (thick as appropriate)?

(YES)

(NO)

DATE _____

SIGNATURE _____

Tournament Report Form

IT3

Federation			Name of Tournament						
Country and Place of Tournament				Starting date		Ending date			
Organizer of the Tournament									
Contact Information (E-mail) of the person responsible for information:									
Number of Rounds			Schedule (number of rounds/day)			Rate(s) of play			
Tournament Type			Pairing System of a Swiss System Tournament _____ Manual <input type="checkbox"/> Person responsible _____ Computerized <input type="checkbox"/> Program used _____						
Special Remarks (exceptions in pairing, restart option,...)									
Type	Number	Number of feds	host fed players	other fed players	Type	Number	Number of feds	host fed players	other fed players
Rated					Unrated				
GM					WGM				
IM					WIM				
FM					WFM				
Chief Arbiter and contact information for Chief Arbiter (Email)									
Deputy Chief Arbiter									
Arbiter									
Arbiter									
Arbiter									

The organizer must provide this report form to each arbiter who has achieved a norm, his/her federation, the organizing federation and the FIDE Secretariat. **PRIVACY NOTICE: Chief Organizer's and Chief Arbiter's email address is required only for institutional purposes and will be displayed on FIDE website. Please, refer to FIDE Data Protection Policy published in FIDE at <https://www.fide.com/privacy>**

Certificate of Title Result			
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O GM

O IM

O WGM

O WIM

Name: First name:

ID-number: Federation:

Event: Start: Close:

Chief Arbiter (name, ID): number of games:

rate of play: number of federations:

number players not from title applicant's federation number rated opponents

number players from host federation total number titled opponents

numbers of: GM IM WGM WIM FM WFM

Where applying 1.43e:

number of federations: number of rated players not from host federation:

number of players not from host federation holding GM, IM, WGM, WIM titles

Special remarks:

Rd	Opponents	ID	Fed	Rating	Rat. 1.46c	Title	Score
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							

Rating average (1.46b):

Score required:

Score achieved:

Exceeding norm by points

.....
Chief Arbiter's signature**Federation confirming the result:**

Name of federation official:

Signature:

PRIVACY NOTICE: this form contains personal data, please check FIDE Privacy policy at www.fide.com/privacy

Note: Unrated = 1000, but see 1.46b. Score = 1, ½ or 0.5, 0 for played games or +, =, - for unplayed games

The organizer must provide this certificate to: each player who has achieved a title result,
to the organizing federation, the player's federation and the FIDE Office.

TITLE APPLICATION**IT2**

The following federation _____ hereby applies for the title of:
 Grandmaster (minimum level 2500) _____ International Master (2400) _____
 Woman Grandmaster (2300) _____ Woman International Master (2200) _____
 To be awarded to:

family name:		first name:	
FIDE ID Number:	FED		
date necessary rating gained:		level of highest rating:	

Titles can be awarded conditional on reaching the required rating at a later date (see Title Regulations 1.50c for the procedure to be followed in this case).
 Herewith certificates (IT1s) and cross-tables for the following norms

1. name of event:		location:	
dates:		tournament system:	
average rating of opponents:		total number of games played:	
points required:		points scored:	
number of games to be counted: (if not all)			
(after dropping games): points required:		points scored:	
number from host federation:		number not from own federation:	
number of opponents: total titled ___ GMs ___ IMs ___ FMs ___ WGMs ___ WIMs ___ WFMs ___ rated ___ unrated ___			

2. name of event:		location:	
dates:		tournament system:	
average rating of opponents:		total number of games played:	
points required:		points scored:	
number of games to be counted: (if not all)			
(after dropping games): points required:		points scored:	
number from host federation:		number not from own federation:	
number of opponents: total titled ___ GMs ___ IMs ___ FMs ___ WGMs ___ WIMs ___ WFMs ___ rated ___ unrated ___			

3. name of event:		location:	
dates:		tournament system:	
average rating of opponents:		total number of games played:	
points required:		points scored:	
number of games to be counted: (if not all)			
(after dropping games): points required:		points scored:	
number from host federation:		number not from own federation:	
number of opponents: total titled ___ GMs ___ IMs ___ FMs ___ WGMs ___ WIMs ___ WFMs ___ rated ___ unrated ___			

Attach another form IT2 if there are more supporting norms.

total number of games _____ (minimum **27**) special comments _____

name of Federation official _____ date _____

signature _____