

# **Privacy Policy for the Ness Bridge Club**

May 2018

## **What personal data does our bridge club collect?**

The data we routinely collect includes members' name, address, email address, telephone number, alternative telephone number (e.g. mobile) and Scottish Bridge Union (SBU) Master Points number. We collect this data directly from each member when they join the club. For some of our members we may keep additional information such as committee memberships or tournament director roles, but only during their relevant tenure.

We collect the scores from games when you play at the club; these being displayed on the results pages of our website. Your name and SBU number will also be forwarded to the SBU and used by them for maintaining the SBU Master Points scheme.

## **What is this personal data used for?**

We use members' data for the administration of your membership, the communication of information and the organisation of events. We provide your personal data to the SBU for their use as explained in the section below.

## **Who is your data shared with?**

Your membership data is passed on to the SBU in order to participate in the Master Points Scheme, receive notification of items of interest, etc.

The SBU shares limited data with your SBU District, or the district of your home club.

Information regarding your results is given to the SBU for use in its Master Points scheme.

Some of your personal data may be passed by the Ness club to the Association of Inverness Bridge Clubs (A.I.B.C.), Highland District or the SBU to enable you participate in tournaments run under their auspices.

Your personal data is not passed on by us to organisations other than those indicated above, whether or not connected with bridge.

## **Where does this data come from?**

Data for most of our members comes from them when they join the Ness Bridge Club or when they update their information on SBU Mempad or on our club website.

The information held by the SBU may be updated by certain club officials.

If you are a direct member of the SBU, you will instead have provided your personal data directly to us when you joined our bridge club, or when you updated your record with us or with the SBU.

Scoring data comes directly from the results of the club games in which you play.

## **How is your data stored?**

This information is mainly stored in digital form on personal computers. The club Secretary maintains a spreadsheet of members and their information as described above. The club Master Points Secretary and Treasurer have copies of this spreadsheet.

There is no information that is stored remotely.

## **Who is responsible for ensuring compliance with the relevant laws and regulations?**

Under the General Data Protection Regulation (GDPR) we do not have a statutory requirement to have a Data Protection Officer.

However, the Committee has decided that the duties of Data Protection Officer (DPO) will be carried out by the MasterPoints Secretary, who will inform and advise the Club Committee about their obligations to comply with the GDPR and other data protection laws. The DPO will be the first point of contact for supervisory authorities and for members whose data is processed. The DPO will also monitor compliance with the GDPR and UK data protection laws.

## **Who has access to your data?**

Members of the committee of the club have access to members' data in order for them to carry out their legitimate tasks for the club. Tournament directors have limited access to members' data for them to carry out their legitimate role when directing events.

## **What is the legal basis for collecting this data?**

The Ness Bridge Club collects the personal data that is necessary for the purposes of its legitimate interests as a membership organisation and participant in an internationally recognised and regulated, competitive mind sport.

For some data, such as that relating to financial matters, the basis for its collection and retention is to allow the club to comply with its legal obligations.

## **How you can check what data we have about you?**

If you want to see the basic membership data we hold about you, you should contact the Data Protection Officer, the MasterPoints Secretary.

You can contact us with a "Subject Access Request" if you want to ask us to provide you with any other information we hold about you. If you are interested in any particular aspects, specifying them will help us to provide you with what you need quickly and efficiently. We are required to provide this to you within one month.

We will not usually levy a fee for this, though we can charge a reasonable fee based on the administrative cost of providing the information if a request is manifestly unfounded or excessive, or for requests for further copies of the same information.

## **Does the Ness Bridge Club collect any "special" data?**

The GDPR refers to sensitive personal data as “special categories of personal data”.

We do not record any such special data.

## **How can you ask for data to be removed, limited or corrected?**

There are various ways in which you can limit or specify how your data is used.

- You could maintain your club membership with your correct name but with limited contact details. However, we do need to have at least one method of contacting you. You could for example simply maintain an up-to-date email address, but of course this would limit what we and the SBU are able to provide you with in the way of written information, so you would not be able to get any benefits that require a mailing address.
- You do not need to provide us with your date of birth. If you are a junior (less than 25 years of age on 1<sup>st</sup> January of the membership year) you will need to divulge that fact in order to be eligible for the membership fee reduction and if you wish to enter junior events or gain other youth concessions.
- You may choose not to receive information emails from our club.
- Any of these options can be implemented for your club membership by contacting the Data Protection Officer or the club Secretary.

## **How long we keep your data for, and why?**

We normally keep members’ data after resignation, or lapsed membership, this in case they later wish to re-join. However, we will delete contact details entirely upon request.

Since underlying statistical data, like scores from bridge games, continues to be necessary in relation to the purpose for which it was originally collected and processed, results from events are not deleted by Ness Bridge Club or the SBU, although they will no longer be attributed to a player who does not want their data to be kept.

Historical ranking lists and prize lists are required for archiving purposes and names cannot be removed from them.

Other data, such as that relating to accounting or personnel matters, is kept for the legally required period.

## **What happens if a member dies?**

We will normally delete deceased members’ personal data at the end of the season in course. If requested appropriately to delete it earlier we will do so.

## **Can you download your data to use it elsewhere?**

To access your data held by Ness Bridge Club contact the club Secretary.