

# Privacy Notice



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## **What personal data does the English Bridge Union (EBU) collect?**

The data we routinely collect includes members' names, addresses, email addresses and dates of birth. We collect this data directly from our members and via our affiliated clubs and counties. This may involve the use of other data processors eg Bridgewebs, Pianola.

We also store data from those *contacts* who have given their information to the EBU or its associated charity, English Bridge Education & Development (EBED), when making enquiries, registering for events or registering as *potential members*.

For some of our members we may have additional information such as committee memberships, teaching qualifications, [DBS checks](#) done with your knowledge and permission, or tournament director roles. We will also keep information relating to disciplinary matters and sanctions.

For those who are on committees, have won prizes or awards, have represented England in international play, or have a biography for any other reason, we may have photographs of them. We also have more general photos and some videos of bridge players where individuals are not so easily identifiable.

We collect the scores from games you play, which are used in maintaining the National Grading Scheme (NGS) and the Master Point scheme.

For members of staff we collect personal data and maintain personnel records in line with statutory requirements and best practice.

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

We use members' data for the administration of your membership; the communication of information, including sending English Bridge magazine to those who choose to have printed copies of it; and the organisation of competitions and other events. We provide a limited amount of data for use by scoring programs to ensure that members' results are correctly attributed to them.

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

Membership data is shared with our associated charity, English Bridge Education & Development (EBED), with whom we share offices and data systems.

Membership data is also passed on to the relevant county(ies) of allegiance of each member.

Unless you have chosen to have your NGS grade kept private or your Master Point rank hidden, information that derives from scoring, such as Master Point rank or NGS, is listed with your county of affiliation and is publicly available. This is also available to bridge scoring program users for stratification and handicap purposes.

A limited amount of information (name, EBU number, county, post town) is listed in the database made available for use by scoring programs. This is to allow the correct identification of players for scoring purposes.

Some of your data will be available for use by organisations that act as Data Processors on our behalf, such as Pianola and Bridgewebs. They are not free to pass this on to other organisations that are not connected with the EBU.

Your personal data is not provided by us for use by any organisations other than those indicated above, even if connected with bridge.

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

Data for most of our members comes from their affiliated clubs, through whom their EBU membership is gained.

If you change the data in your club record, your EBU data may be updated by the club if you gave it permission, when you joined, to make these changes. Otherwise, your EBU data can only be updated by you, either directly in My EBU, or by contacting us and telling us what information needs to be updated. You can change this permission in My EBU by going to Account -> My Details.

If you are a Direct Member, you will have provided your personal data directly to us when you joined the EBU, or when you updated your record.

Scoring data from all the games you play in is provided to the EBU electronically by the sponsoring organisation of the game in question – usually a local club or a county. This may be done by uploading a scoring file directly from the scoring program to the EBU website, or by uploading the file to the club's My EBU, or by using a third-party processor such as Pianola or Bridgewebs.

## How is your data stored?

Most of our data, including our main membership database, is stored in digital form on computers, and we operate in “the cloud” using [Amazon Web Services](#) in compliance with the GDPR.

We also have a few other small databases for specific purpose:

1. The [Bridge Warehouse](#) has a separate database of it’s customers, to which members and others are added when they purchase items or return them. Members who wish to check on this information should contact the Bridge Warehouse directly.
2. Our competitions department has a database maintained by [Pianola](#) that has a limited amount of information for those of our members who regularly play in EBU events, which enables us to email their results to them. This information is accessible to the members themselves, by logging on to Pianola, from where contact information can be updated.
3. Some data, primarily that relating to scoring current and past competitions, is stored on Google Drive, which is GDPR compliant

The remainder of our data is kept in the form of written documents stored in our Aylesbury offices.

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

Under the GDPR (General Data Protection Regulation) we do not have a [statutory requirement to have a Data Protection Officer](#). The person who is responsible for ensuring the EBU discharges its obligations under the GDPR is the General Manager, Gordon Rainsford, [gordon@ebu.co.uk](mailto:gordon@ebu.co.uk).

He is the person who is responsible for maintaining a log of data breaches and notifying the ICO and any members affected as necessary, in accordance with our legal obligations.

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

Members of staff of the EBU have access to members' data in order for them to carry out their legitimate tasks for the organisations, such as responding to enquiries from those members.

Members of committees, the board of the EBU and the trustees of EBED will be given access to this data for any legitimate purpose to do with their roles as officers of the organisations or members of their committees but will not be free to pass it on to any other organisation.

Organisers of events can access the EBU database that provides the limited [information necessary](#) for them to correctly identify players. This information may be further limited by members choosing to have their NGS grade or Master Point rank kept private, or by choosing to become an [anonymous member](#).

Sub-contractors of the EBU & EBED may be given access to data for specific tasks, such as mailing copies of *English Bridge* magazine on our behalf. They are not allowed to use it for any other purpose.

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

The English Bridge Union collects personal data that is necessary for the purposes of its *legitimate interests* as a membership organisation and as the authority of 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 comply with our legal obligations.

Similarly, personnel data is kept in compliance with our 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 can log in to My EBU and go to Account -> My Details. There you can also update most of your details or change the permissions you wish to grant for the use of your data.

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.

There is not usually 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 EBU collect any “special” data?**

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

Of these categories, the only data we record relates to the disabilities of some of our members when they have explicitly requested it to be recorded for the purpose of giving them stationary positions in our competitions (which we aim to do wherever feasible). If you wish to change this data on your record you can do so at any time by contacting the Office Manager at [membership@ebu.co.uk](mailto:membership@ebu.co.uk).

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

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

- If you wish you could become an “anonymous” member. This would involve you having a pseudonym with an EBU number under which you would play. If you do this however, ***you would not be able to access any EBU membership benefits such as the magazine or playing in EBU tournaments.***
- You could maintain your EBU 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 are able to provide you with in the way of written information, so you would not be able to get the *English Bridge* magazine in printed form or any other member benefits that require a mailing address.
- You do not need to provide us with your date of birth unless you wish to enter age-limited (junior or seniors) events or gain concessions based on age.
- If you do not want your NGS grade to be public, you may choose for it to be kept private, but if you do this you would not be able to benefit from any stratification or special prizes based on it. You can change this option as often as you wish.
- You may choose not to appear in future Master Point promotions lists and for your Master Point rank not to be publicly listed, but if you do this you would not be able to benefit from any stratification or special prizes based on it.
- You may choose not to receive information emails from the EBU and EBED (we do not send any out on behalf of other organisations).
- Any of these options can be implemented by logging on to My EBU, going to Account → My Details and editing your record there, either to correct erroneous data or to delete information you do not wish us to have . If you need any assistance with this you may contact the Office Manager at [membership@ebu.co.uk](mailto:membership@ebu.co.uk).
- You may ask that any photograph of you that appears on the website be deleted by contacting the Office Manager at [membership@ebu.co.uk](mailto:membership@ebu.co.uk).
- You may choose to have your details removed from our Pianola database by contacting [support@pianola.net](mailto:support@pianola.net) – this is only relevant for a relatively small number of members who play in EBU competitions and receive emails giving them their results.
- You may choose to have your details (other than those relating to transactions) removed from the Bridge Warehouse database by [contacting them](#) directly.

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

We normally keep members' data after they resign or their membership lapses. This is because we find members sometimes later wish to re-join (occasionally after several decades) and if we no longer had their records we would be unable to re-instate their Master Point rank. However, we will delete any former member's contact details entirely on 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 used for the NGS are not deleted 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. Similarly, archived news articles, whether on the website, or in the EBU's magazines (both printed and online), will not usually be deleted.

Other data, such as that relating to accounting or personnel matters, is kept for at least the legally required or recommended period – 7 years for financial transactions, 12 years after the final benefit for staff pensions .

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

We normally keep members' information after they die and show their Master Point ranks in all-time ranking lists. If requested by their next-of-kin to delete it we will do so on the same basis as [when requested to remove data by a former member.](#)

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

You can download a csv spreadsheet with data from all sessions registered with the EBU, including Master Points and NGS. You can do this by logging on to My EBU and in your Sessions list, clicking on "Download as CSV".