

PRIVACY NOTICE FOR EPC BRIDGE PLAYERS



The EPC is a private members club which offers organised bridge as one of its member benefits.

The EPC Bridge Committee organise and develop bridge at the club and is committed to ensuring that the privacy of members who play bridge at the EPC club is protected.

If we ask you to provide certain information by which you can be personally identified, then you can be assured that it will only be used in accordance with this privacy statement.

NB: By providing personal information to the Committee you agree to the collection, storage and use of personal information in accordance with this policy.

PRIVACY COMMITMENTS

1. Personal Data will only be collected, kept, used and shared for legitimate club purposes and activity, or if we're legally required to do so.
2. We will be as clear and open on what Personal Data is collected and how it will be processed.
3. For as long as we maintain records of your Personal Data, it will be kept up to date and protected with appropriate safety measures.

1. WHAT PERSONAL DATA DOES EPC BRIDGE COLLECT?

The following information can be collected from EPC members who participate in organised bridge at the club and visitors (who attend bridge events):

- First name and surname
- Your contact details:
 - Email address
 - Telephone numbers (home and mobile)
- The scores from games you play, which are displayed on our results pages and used in maintaining the EBU's National Grading Scheme (NGS) and the Master Point scheme.
- For bridge events that you attend:
 - Food preferences and special dietary requirements
 - Any associated payment for the event
 - Your feedback for example from training courses or weekends away
 - Photographs for use in publicity. Photos taken of players at Bridge events may be used on the EPC Bridge website, in Bridge newsletters and future promotional material. Where appropriate (e.g. individual shots rather than general group photos) permission will be sought and you will be asked to sign a consent form.
- Other: For some of our members additional information may be held such as Committee Members, information on club Director and information relating to disciplinary matters.

Contact details of Bridge Committee Members and bridge teachers/speakers is likely to be shared with other bridge playing members and publicly available via our BridgeWebs website.

You are not required to provide this information. However, if you choose not to provide contact details, we might be unable to keep you informed of activity and collect your feedback.

2. HOW IS YOUR PERSONAL DATA IS PROCESSED?

We process personal data to keep you better informed, provide you with a better experience (more personalised) and for administration purposes. This includes:

- Sending out notices of bridge events, competitions, AGMs, etc.
- Sending out ad hoc emails about events that you have booked on including bridge weekends away, meal choices, training courses or lessons
- Analysing and reviewing event feedback
- Analysing how the website is used
- (As necessary) Communicating offers from any sponsors.

You are free at any time to ask to be removed from these emailing, but they may make communications with you more difficult.

NB: The EPC send out the regular bridge bulletin.

3. WHO IS YOUR DATA SHARED WITH?

1. The English Bridge Union (EBU): When you sign up for an EBU number, your membership data is passed on to the EBU. Your results are then passed on to the EBU for use in its master point and NGS ranking schemes, unless you have chosen to have your NGS grade kept private.
2. The English Bridge Education and Development (EBED): The EBU shares data with its associated charity, EBED, since it shares offices and data systems with them.
3. The Warwickshire County Bridge Association (WCAB): The EBU also shares this data with the WCBA or any other county that you may have nominated as your county of allegiance. The WCBA use results data for county competitions including SIMS events and league match results.
4. Our bridge scoring software (EBU score) and BridgeMate scoring devices – a limited amount of information is sent to allow the correct identification of players for scoring purposes.
5. Bridgewebs: EBU clubs use this service host their website and results. Bridgewebs are acting as a Data Processor on our behalf and they are not free to pass this on to other organisations that are not connected with EPC bridge players.
6. Pianola: Hold some of your data to enable a more detailed analysis of your results. Pianola are also acting as a Data Processor on our behalf and they are not free to pass this on to other organisations that are not connected with EPC bridge players.
7. Survey Monkey and MailChimp (for ad hoc mailings): We use the EPCs' accounts on these third party service providers:
 - Survey Monkey is used to send out questionnaires e.g. feedback forms and meal preferences
 - MailChimp is used to send out our general or ad hoc bridge emails.Please refer to the EPC's Privacy Policy to understand how your personal data privacy is protected by the club.

Notes

- Any amendments to data held by the EBU is the responsibility of the member to manage. You can control and update who see what information about you using the 'MyEBU' menu.
- A player who enters an event, or registers on a course, agrees, in so doing, to their name being added possibly added to publicly displayed lists or name badge.
- WhatsApp: Upon request and with your consent, administrators of our Bridge WhatsApp Groups can include you any of our bridge WhatsApp Bridge groups. Please note that when install WhatsApp on your mobile, you give WhatsApp permission to access your contacts. Under GDPR, EPC Bridge is classed as the data controller so liable to protect your data – even though we don't hold any information about your contacts – so this creates a problem for us. In addition, WhatsApp is covered by US Privacy laws and not GDPR. We will monitor this situation and may have to withdraw from using WhatsApp in the future.

4. WHERE DOES THIS DATA COME FROM?

Data for most comes from you when you decide to become an active bridge player in EPC organised bridge sessions or when you update your information either directly or via your EBU record.

The information held by the EBU may be updated by you or us if you have given us permission to change your record. (As mentioned above, you can change this permission on 'My EBU' by going to Account -> My Details.)

If you are already a member of the EBU when you start playing organised bridge at the EPC, you will provide your personal data when you input your EBU number during one of our organised playing sessions.

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

5. HOW IS YOUR DATA STORED?

Most of the data, including the membership database, is stored in digital form on the bridge computer or in the form of written documents stored at the EPC.

The remainder of data is kept in the form of written or electronic documents stored at the home address of Committee members, bridge teachers or bridge players who are volunteers.

Information relating to sessions of bridge are stored, in perpetuity, on the EPC BridgeWeb site.

We use Pianola/Bridgewebs as our data processor for this purpose. Any information that is stored remotely is stored in the EU/ in compliance with the GDPR.

6.WHO IS RESPONSIBLE FOR ENSURING COMPLIANCE WITH THE RELEVANT LAWS AND REGULATIONS?

The Bridge Committee are collectively responsible for ensuring we discharge our obligations under the GDPR. We will maintain a log of data breaches and notifying the ICO and any members affected as necessary, in accordance with our legal obligations.

NB: Under the GDPR (General Data Protection Regulation) there is no statutory requirement for us to have a Data Protection Officer.

7. WHO HAS ACCESS TO YOUR DATA?

The EPC Bridge Committee and other member bridge player volunteers, will have access to your information for purposes associated with Bridge in order for them to carry out their legitimate tasks for the organisations.

8. WHAT IS THE LEGAL BASIS FOR COLLECTING THIS DATA?

We collect personal data for the purposes of the legitimate interest under our Terms of Reference to organise and develop bridge at the EPC.

For some data, such as that relating to financial matters, the basis for its collection and retention is to ensure correct accounting purposes.

9. HOW YOU CAN CHECK AND/OR CORRECT WHAT DATA WE HAVE ABOUT YOU?

Please help us to keep your data accurate by notifying us of any change to your mailing address, phone number or e-mail address etc.

You can always make a 'Subject Access Request' if you want us to provide you with any information we hold about you. Please send an e-mail to the Bridge Committee member responsible for IT (currently Ray Fiveash E: ray@mercatevents.com)). We are required to provide this to you within one month.

10. HOW CAN YOU ASK FOR YOUR DATA TO BE CORRECTED, LIMITED OR REMOVED?

Your personal data is protected by legal rights, which includes the right to:

- Request that your personal data is changed, corrected or removed
- Object to our processing of your personal data.

There are various ways in which you can change how your data is used:

1. If you wish you could become an 'anonymous' bridge player at the EPC 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.

2. 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 EBU are able to provide you with in the way of written information, so you would not be able to get English Bridge in printed form or any other benefits that require a mailing address.
3. If you do not want your NGS grade to be public, you may choose for it to be kept private. You can change this option as often as you wish.
4. You may choose not to appear in master point promotions lists.
5. You may also choose not to receive bridge information emails from the EPC by making sure 'Bridge Club and Lessons' is not highlighted.
 - Any of the options 1-4 above can be changed for your EBU membership by logging on to your '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 Bridge Committee

You:

- Can read more about your rights here – <http://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>
- Have a right to complain to the Information Commissioner's Office which regulates the processing of personal data. Complaints received about this will be taken very seriously. Please bring to our attention any instances where the collection or use of information is unfair, misleading or inappropriate. Any suggestions for improving our procedures would be welcomed.

11. HOW LONG WE KEEP YOUR DATA FOR, AND WHY?

We retain information about you, even if you leave membership of the EPC, in order to invite you back as a visitor to any of our events.

However, we will delete any former member's contact details on request. Please note that certain data can be removed upon deletion of a bridge playing member, however:

- 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 by us or the EBU 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.

A players information is deleted after they die. However again, historical ranking lists, prize lists, and website announcements, are required for archiving purposes and names cannot normally be removed from them. In addition, if a player is mentioned on our virtual 'Wall of Fame' this may remain on the website.

12. USE OF COOKIES ON OUR WEB SITE

A cookie is a small file which asks permission to be placed on your computer's hard drive.

The EPC Bridgeweb site, like all other all club sites using the bridgewebs facility, uses Cookies to help improve the site experience.

Below is an extract from the bridgewebs Privacy Policy about their use of Cookies. Cookies are used:

- *When using the Members Only pages*
- *When using the Web Administration*

The cookies are used to remember that you have logged in and avoid having to enter a password for each page.

No personal information is remembered using cookies and the information recorded is not used for any tracking purposes nor given to any third party.

Please refer to <http://www.bridgewebs.com/bw/page29.html> for more information.

13. UPDATES AND CHANGES TO THIS PRIVACY POLICY

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

14. WHERE CAN I FIND OUT MORE?

If you have questions regarding this privacy statement or our handling of your personal data, please contact the EPC Bridge Committee.

15. OTHER

The EPC BridgeWeb website or our emails may contain links to other websites of interest. However, once you have used these links, please note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

Adopted by Committee Committee: 22nd May 2018