Privacy Notice for Kent Contract Bridge Association (KCBA)

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What personal data does KCBA collect?

The data we routinely collect includes members' names, addresses and email addresses. We collect this data via the English Bridge Union (EBU), our affiliated clubs or from individual members when they join directly or enter competitions.

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.

Who is your data shared with?

Your membership data is passed on to the EBU, of which you become a member when you join an affiliated bridge club. The EBU shares data with KCBA when you have nominated Kent as your county of allegiance.

Some of your data will be available for use by organisations such as Bridgewebs acting as a Data Processor on our behalf. They are not free to pass this on to other organisations that are not connected with KCBA.

Your personal data is not passed on by us to any other organisation, whether or not connected with bridge.

Where does this data come from?

Data for most of our members comes from them when they join an EBU affiliated club or when they update their information either directly or via their EBU record. All the personal information is collected and collated by EBU.

EBU make available to KCBA the personal information held by them for any player who chooses Kent as their primary county of allegiance.

Our affiliated clubs also provide us with personal information, particularly for members of their clubs who affiliate to other counties than Kent.

The information held by the EBU may be updated by your club if you have given it permission to change your record. You can change this permission on My EBU by going to Account -> My Details, or by phoning the EBU office on 01296 317200.

EBU will also make available to KCBA the personal information of players who are direct members of the EBU who choose Kent as their primary county of allegiance. KCBA does not have access to make changes to your record on the EBU database, so changes to it need to be made using your My EBU or through your club if they have your permission to change your record, or by contacting the EBU directly.

How is your data stored?

This information is mainly stored in digital form on computers. We use organisations such as Bridgewebs as our data processor for this purpose. EBU captures more personal information than KCBA needs and KCBA only stores and uses the information it needs. EBU makes the other personal information it has on KCBA members available to KCBA but this is not stored or managed by KCBA.

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 KCBA discharges its obligations under the GDPR is the KCBA Chairperson.

Who has access to your data?

Members of the KCBA Committee have access to members' data in order for them to carry out their legitimate tasks for KCBA.

Sub-contractors of KCBA may be given access to data for specific tasks, such as sending mailings. They are not free to use it for any other purpose.

What is the legal basis for collecting this data?

KCBA collects 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 comply 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 should email KCBAdatabase@gmail.com with your request.

You can contact us with a "<u>Subject Access Request</u>" 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 KCBA 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 of these categories.

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. 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.
- 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. You can change this option in My EBU as often as you wish.
- You may choose not to appear in master point promotions lists.
- You may choose not to receive information emails from KCBA (we do not send any out on behalf of other organisations).
- Any of these options can be implemented for your club membership by contacting your local club.
- Any of these options can be implemented for your EBU membership 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 EBU Office Manager karend@ebu.co.uk

KCBA collects the vast majority of its members' data via EBU and our affiliated clubs and KCBA is therefore reliant on them for the accuracy and timeliness of that data. Members can provide updates or requests for removal or deletion direct to the KCBA membership Secretary if they wish.

How long we keep your data for, and why?

We normally keep members' data after they resign or their membership lapses in case they later wish to re-join. However, we will delete any former member's contact details entirely on request.

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

What happens if a member dies?

When a member dies their data will remain in the EBU's database of the KCBA's members until their name has been deleted from the My EBU membership list of each club of which the person was a member. Once so deleted the deceased person's data will no longer be in the membership data which the KCBA downloads from the EBU.

Can you download your data to use it elsewhere?

KCBA holds limited personal data and it is not possible to download this data. However your session data that is held by the EBU can be downloaded as a csv spreadsheet. You can do this by logging into My EBU and in your Sessions list, clicking on "Download as CSV".