PRIVACY POLICY FOR OLICANA BRIDGE CLUB

What personal data does Olicana Bridge Club collect?

The data we routinely collect includes:

- I. **Members**. Members' names, addresses, email addresses and phone numbers. This is normally collected from members when they join the club.
- II. **Visitors.** Visitors' names are collected with their email address for the purpose of sending out financial statements.

(In 2021 collecting cash at the table ceased and instead table fees are collected monthly by sending out personal statements).

For some of our members we have additional information such as committee memberships, bridge teaching qualifications, Tournament Director qualifications, or tournament director roles. We will also keep information relating to disciplinary matters and sanctions.

We collect the scores and data from games played, which are displayed on our website results pages, used in various annual Club competitions on our website and used in maintaining the EBU's National Grading Scheme (NGS) and the Master Point scheme.

What is the 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 certain data to English Bridge Union (EBU) for their use as explained in the section below. We provide a limited amount of data for use by scoring programmes to ensure that members' results are correctly attributed to them.

Who is your data shared with?

Your membership data is passed on to the EBU, of which you become a member when you join the **Olicana Bridge Club.** The EBU shares data with it's associated charity, English Bridge Education and Development (EBED), since it shares offices and data systems with them, and also with Yorkshire Contract Bridge Association (YCBA) or any other county that you may have nominated as your county of affiliation.

Data from your results is shared with the EBU for use in its master points system and national grading scheme (NGS). Data from certain teams' results is shared with the YCBA for teams' cross imps analysis. Data from results is also available to bridge scoring programme users for stratification and handicap purposes.

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

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

Where does this data come from?

Data for most of our members comes from them when they join **Olicana Bridge Club** or when they update their information either directly, or via the club website or via their EBU record.

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.

If you are a direct member of the EBU, you will instead have provided your personal data directly to us when you joined **Olicana Bridge Club**, or when you updated your record for us. SD> This looks like a repeat of the first sentence.

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

How is your data stored?

The information is mainly stored in digital form on computers and in the form of written documents stored at committee agreed locations. We use Bridgewebs as our data processor. Our objective is that any information that is stored remotely is stored in compliance with the GDPR.

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 Olicana Bridge Club discharges its obligations under the GDPR is the Club Secretary.

The Club Secretary 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?

The Secretary and certain other officers of the committee of Olicana Bridge Club have varying degrees of access to member's data in order for them to carry out their legitimate tasks for the organisation.

Members of Olicana Bridge Club who have requested email registration on the club website can access the Member's only area of the club website with a personal password where a list of permitted phone numbers and email addresses can be seen and used solely for contacting other members. They are not free to use it for any other purpose.

What is the legal basis for collecting this data?

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

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 Club Secretary.

You can contact us with a "Subject Access Request" if you want 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 Olicana 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 how your data is used.

- If you wish you could become an "anonymous" member. This would involve you having a
 pseudonym with a 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 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.
- 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 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 **Olicana Bridge Club** (we do not send any out on behalf of other organisations).
- Any of these options can be implemented for your club membership by contacting the Club Secretary.
- 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 Office Manager at EBU.
- If you have opted to access the Member's Only section of Olicana Club Website you can change your personal details at any time.
- Please be aware that if you opt out of information emails we will no longer be able to send you
 personal statements and it will be your responsibility to log in to the members section and
 keep your account up to date. Visitors will not be able to opt out of information emails.

How Long we keep your data and why?

We normally keep member's data for a limited period 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.

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 **Olicana Bridge Club** or by the EBU.

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

What happens if a member dies?

We normally keep members' information for a limited period after they die. 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?

Your session data that is held by the EBU can be downloaded as a csv spreadsheet. You can do this by logging on to My EBU and in your Sessions list clicking on 'Download as CSV'. To access recent Sessions List clicking on "Download as CSV". To access recent sessions data held by **Olicana Bridge Club** contact club website: go to Results – Personal Analysis – Name.
