Privacy Notice for Pershore Duplicate Bridge Club ("PDBC")

What personal data does PDBC collect?

The data we routinely collect includes members' names, addresses, telephone numbers, email addresses and Gift Aid declaration. We collect this data directly from our members when they join the club.

For some of our members we may have additional information such as committee memberships, prize winners (which may include photographs for our web site and club archive), teaching qualifications, with the member's knowledge and permission, or tournament director roles. We collect 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.

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 data to the English Bridge Union (EBU) for their use as explained in the section below and we use the GiftAid information in relation to our charitable status.

Who is your data shared with?

Your membership data is passed on to the EBU, of which you become a member when you join PDBC The EBU shares data with its associated charity, English Bridge Education and Development (EBED), since it shares offices and data systems with them, and also with Worcestershire County Bridge Association or any other county that you may have nominated as your county of allegiance.

Information from your results is also passed on to the EBU for use in its master point and NGS schemes, unless you have chosen to have your NGS grade kept private, and this may also be used for stratification and handicap purposes,.

Some of your data will be available for use by Bridgewebs (our web site hosting service) acting as a Data Processor on our behalf. They are not free to pass this on to other organisations that are not connected with PDBC. You can view the data held by Bridgewebs by going into the Members Area of the PDBC web site. If you wish any Bridgewebs data removed please contact PDBC (Alan Boyes)

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 our members comes from them when they join PDBC or when they update their information either directly or via their EBU record.

The information held by the EBU may be updated by PDBC if you have given it permission to change your record. You can change this permission on My EBU by going to Account -> My Details. 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 computer(s) and in the form of written documents. We use Bridgewebs as our web site provider and provider of results information and in some instances bulk email to members. Bridgewebs has a Members Only area which is accessed by personal password where you can opt out of certain uses of your data (other than event results). Any information that is stored by Bridgewebs 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 PDBC discharges its obligations under the GDPR is the Chair – currently Alan Boyes.

Who has access to your data?

Some members of the committee of PDBC have access to members' data in order for them to carry out their legitimate tasks for the Club eg hosting.

Bridgewebs may be given access to data for specific tasks – see above. They are not free to use it for any other purpose.

What is the legal basis for collecting this data?

PDBC collects personal data that is necessary for the purposes of its *legitimate interests* as a membership organisation, registered charity solely for Gift Aid and participant in an internationally recognised and regulated, competitive mind sport.

For some data, such as Gift Aid, the basis for its collection and retention is to comply with our legal obligations.

How you can check what data we have about you?

We only hold data you have provided and from results of events you have competed in. If you want to see the data we hold about you, you should contact the person named above.

You can contact us with a "<u>Subject Access Request</u>" if you want to ask us to provide you with 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 charge 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 PDBC 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. Members with a disability who have requested giving them stationary positions in our competitions, which we aim to do wherever feasible, may have that request recorded for a specific event (eg Swiss Pairs) only and is not recorded otherwise.

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" EBU 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 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.
- 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 by contacting MyEBU. However, the Club uses NGS information in determining Handicaps and Stratification in events. If we do not have access to your NGS information you will be assumed to have the highest handicap and highest stratification "grade". ie you will not receive an allowance for your NGS ranking which might adversely your event result(s).
- You may choose not to appear in master point promotions lists. (contact EBU)
- You may choose not to receive information emails from PDBC (we do not send any out on behalf of other organisations), though again you will miss out on important club information as email is our primary source of communicating with members.
- **Personal data held by PDBC can be amended** by contacting the person named above.
- Data appertaining to your EBU membership can be amended 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 of the EBU

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.

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 PDBC 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 GiftAid, accounting or personnel matters, is kept for the legally required period.

What happens if a member dies?

The person named above would normally keep members' information after they die, separately and for a short period. It would not be available to anyone else. If requested by next-of-kin to delete it we will do so.

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 data held by PDBC contact the person named above.