

## Privacy Notice for Bolton Bridge Club Ltd

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### **What personal data does Bolton Bridge Club Ltd collect?**

The data we routinely collect includes members’ names, addresses, email addresses and telephone numbers. 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, teaching qualifications, or tournament director roles.

We collect the scores from games that you play, which are displayed on our results pages and used in maintaining the English Bridge Union (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 EBU for their use as explained in the section below.

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

Your membership data is passed on to the English Bridge Union (EBU), of which you become a member when you join Bolton Bridge Club Ltd. 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 the Lancashire Contract Bridge Association (LCBA) or any other county that you may have nominated as your county of allegiance. Full information about the EBU data use policies can be found on their website at [www.ebu.co.uk/gdpr](http://www.ebu.co.uk/gdpr).

Information from your results is also passed on to the EBU for use in its National Grading Scheme (NGS) and Master Point scheme, 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 our website host acting as a Data Processor on our behalf. They are not free to pass this on to other organisations that are not connected with Bolton Bridge Club Ltd.

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 directly from you when you join Bolton Bridge Club Ltd or when you update your information; your EBU number is obtained via your EBU record.

The information held by the EBU may be updated by us unless you deny us permission to change your record. You can change this permission, or the information held by the EBU, by logging on to My EBU -> Account -> My Details at [www.ebu.co.uk/members](http://www.ebu.co.uk/members).

Scoring data comes directly from the results of the Club games in which you play. NGS (handicap) data are downloaded from the EBU.

### **How is your data stored?**

This information is mainly stored in digital form on computers and in the form of written documents stored at the Club. 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 General Data Protection Regulation (GDPR) we do not have a [statutory requirement to have a Data Protection Officer](#). The person who is responsible for ensuring Bolton Bridge Club Ltd discharges its obligations under the GDPR is the Club Secretary.

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

Members of the committee of Bolton Bridge Club Ltd have access to members' data in order for them to carry out their legitimate tasks for the organisation.

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

Bolton Bridge Club Ltd 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 the requirement to maintain an up-to-date register of members and also financial matters, the basis for its collection and retention is to comply with our legal obligations as a company limited by guarantee.

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 data we hold about you, you should contact the Club Secretary.

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 Bolton Bridge Club Ltd 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 members who have explicitly requested it to be recorded for the purpose of giving them stationary positions in our duplicates (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 Club Secretary.

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

Under the GDPR you have a right to have any personal data that we store about you deleted upon request. You can make this request by contacting the Club Secretary. As we hold your personal data solely to enable you to partake as a member of the Club we will inform you if your deletion request will no longer enable us to retain your membership. We will aim to comply with all deletion requests within 14 days but will provide a realistic time frame upon the making of a request.

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If you believe that our records of your personal data are incorrect you have an ongoing right to request that this information be rectified. You can make a rectification request by contacting the Club Secretary. We will aim to comply with all deletion requests within 14 days but will provide a realistic time frame upon the making of a request.

There are various ways in which you can limit how your data is used by the EBU – for details see the EBU Privacy notice at [www.ebu.co.uk/gdpr](http://www.ebu.co.uk/gdpr). 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 English Bridge magazine or playing in EBU competitions.

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

We normally keep members’ data after their membership lapses for 12 months in case they later wish to re-join. However, we will delete any former member’s contact details entirely on request. Where a member resigns we remove their contact details as soon as practicable.

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 Bolton Bridge Club Ltd 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, are kept for the legally required period.

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

We remove members’ information as soon as practicable after they die.

### **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 -> Sessions at [www.ebu.co.uk/members](http://www.ebu.co.uk/members) and clicking on “Download as CSV”. To access data held by Bolton Bridge Club Ltd contact the Club Secretary.