Privacy Notice for Oxfordshire County Bridge Association (OBA)

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In accordance with the General Data Protection Regulations 2018 (the GDPR), this notice gives details of how and why OBA collects, stores and uses the personal data of its members, together with other relevant information listed below.

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What personal data does OBA collect?

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

For some of our members we may have additional information such as committee memberships, teaching qualifications, <u>DBS checks</u> done with the member's knowledge and permission, or tournament director roles. We will also keep information relating to disciplinary matters and sanctions.

For those who are on our committee, or have won prizes or awards, we may have photographs on <u>our website</u>. We also have photographs taken at special events such as our AGM.

We collect the scores from games you play at County competitions and these are displayed on our results pages and used in maintaining the EBU's National Grading Scheme (NGS) and 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.

General communication of information to members is primarily via email, organised by our Webmaster. Members can opt out of receiving such emails at any time.

Who is your data shared with?

Some of your data will be made available to Bridgewebs (the software company that we use for recording results on our web site) acting as a Data Processor on our behalf. They may only use this for the purposes that we authorise and are not free to pass this on to other organisations that are unconnected with OBA.

Information from your results in County competitions 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.

Your personal data is not passed 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 that personal information is collected and collated by the EBU.

The EBU makes available to OBA the personal information held by them for any player who chooses Oxfordshire as their primary county of allegiance.

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.

The EBU will also make available to OBA the personal information of players who are direct members of the EBU who choose Oxfordshire as their primary county of allegiance.

OBA does not have access to make changes to your record on the EBU database, so changes to it need to be made either by using My EBU, or through your club if they have permission to change your record, or by contacting the EBU directly.

Scoring data comes directly from the results of the County competitions in which you play.

How is your data stored?

This information is mainly stored in digital form on computers, including those operated by Bridgewebs which processes data on our behalf, and those owned by OBA committee members, officers and others who carry out specific legitimate tasks on behalf of OBA. The EBU captures more personal information than OBA needs and OBA only stores and uses the information it needs. The EBU makes the other personal information it has for OBA members available to OBA but this is not stored or controlled by OBA. All personal information held by OBA is securely password-protected.

Who is responsible for ensuring compliance with the relevant laws and regulations?

Under the GDPR we do not have a statutory requirement to have a Data Protection Officer. The person who is responsible for ensuring OBA discharges its obligations under the GDPR is the Chairman or their appointed delegate for the time being.

Who has access to your data?

Members of the OBA Committee have access to members' data when necessary in order for them to carry out their legitimate tasks for OBA. Such data may also be made available from time to time to OBA members who are not members of the Committee but have undertaken to carry out a specific legitimate task for OBA, such as organising competitions or sending mailings. They are not free to use it for any other purpose.

Scores from games you play at OBA competitions, and related scoring data such as ranking lists and scoring ladders, are published on <u>our website</u> and are therefore publicly available.

What is the legal basis for collecting this data?

OBA 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?

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 OBA 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 of the EBU. 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 for example 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 agelimited (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 OBA (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 membership@ebu.co.uk

OBA collects the vast majority of its members' data via the EBU and OBA is therefore reliant on them for the accuracy and timeliness of that data. Members are encouraged to ensure that their details are accurately maintained with the EBU, but may additionally provide updates or requests for removal or deletion direct to OBA if they wish.

How long do 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 OBA 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.

What happens if a member dies?

We normally keep members' information 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?

OBA 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 on to My EBU and in your Sessions list, clicking on "Download as CSV".

To access scoring data held by OBA contact the current Chief Scorer (details of the committee are given under the Information tab on our website www.oxfordshirebridge.co.uk).