

Privacy Notice for the Surrey County Bridge Association (December 2019)

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What is the SCBA?

Surrey County Bridge Association (SCBA) is a county association affiliated to the English Bridge Union (EBU).

What personal data does SCBA collect?

For EBU members that have selected Surrey as their primary county of affiliation we obtain from the EBU contact details those individuals have supplied to the EBU together with Bridge related information such as NGS Grade and EBU Ranking. We also collect contact information from:

- Others that have requested to be on our mailing list.
- Officers (Chairman, Secretary, Treasurer) of clubs within Surrey.
- Individuals that have entered any of our events and in so doing have also provided their contact information.

In addition winners of SCBA or EBU prizes may, at their option and subject to appropriate approval should they be minors, have their photograph displayed on our website.

What is this personal data used for?

We use members' data for the purposes of administration, communication of information and organisation of events. Specifically we use contact information to:

- 1. Distribute our quarterly Newsletter.
- 2. Contact specific groups of individuals to advise them of SCBA activities that may be of interest to them.
- 3. Conduct occasional surveys to seek feedback on specific SCBA activities or on SCBA activities in general.
- 4. Contact specific officers of Surrey Affiliated and non-Affiliated clubs: Chairman, Secretary, Treasurer as required
- 5. Contact individuals for the purposes of refunding entry fees or expenses

Information collected from individuals entering any of our events is used only in respect of the event entered and any future similar event that the individuals concerned might be interested in.

Who is your data shared with?

Our membership data is held in Bridgewebs acting as a Data Processor on our behalf. Bridgewebs have a duty of confidentiality and so they are not free to use our membership data for any other purpose or to pass this on to other organisations that are not connected with the SCBA.

We do not pass on your personal data 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 the SCBA the personal information held by them for any individual that chooses Surrey as their primary county of allegiance.

The information held by the EBU may be updated by your club if you have given 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 SCBA does not have access to make changes to your record on the EBU database, so changes to it need to be made by you updating your membership record using My EBU, through your club if they have permission to change your record, or by contacting the EBU directly.

The online entry form for all SCBA events includes an optional field for an email address to be entered for each individual. Any email addresses entered will be used to send an automatic confirmation of the entry to that person and if that person is not already in our database their name and email address (only) may also be stored.

How is your data stored?

The information is stored in digital form on computers located in the United Kingdom. We use Bridgewebs as our main data processor for this purpose. For the purposes of managing your membership some data from Bridgewebs may be held on the password protected personal computers of individuals that are either SCBA Committee members or individuals that have been delegated by the SCBA Committee to perform certain tasks on its behalf. Some information may, temporarily, be held in printed form and securely disposed of after use.

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 that the SCBA discharges its obligations under the GDPR is the SCBA Chairman (chairman.scba@bridgewebs.com).

Who has access to your data?

Members of the SCBA Committee and a small number of individuals delegated by the Committee to manage specific SCBA activities have access to members' data in order for them to carry out their legitimate tasks for the SCBA.

Sub-contractors of the SCBA 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?

The SCBA 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.

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 SCBA web manager (<u>webmanager.scba@bridgewebs.com</u>)

You can contact us with a "Subject Access Request" (<u>https://ico.org.uk/for-the-public/personal-information/</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 these 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 may charge a reasonable fee based on the administrative effort of providing the information if a request is manifestly unfounded or excessive, or for requests for further copies of the same information.

Does the SCBA 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. The only related data we record is of entrants to our events that have explicitly requested it to be recorded for the purpose of giving them stationary positions in our competitions, or of specifying dietary requirements when we provide the catering. This information is not retained on our main database.

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 the EBU may restrict access to some benefits provided by them.
- 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, the EBU Diary or any other benefits that require a mailing address.
- You do not need to provide 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 may choose not to appear in the EBU master point promotions lists.
- You may choose not to receive information emails from the EBU.
- Any of the above 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 the EBU or the SCBA to have. If you need any assistance with this you may contact the EBU Office Manager <u>membership@ebu.co.uk</u>
- In addition you may un-subscribe from emails from the SCBA at any time, either by contacting the SCBA web manager or by selecting the un-subscribe option on any of our emails.

The SCBA collects the vast majority of its members' data via the EBU and the SCBA 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. For information provided directly to the SCBA requests for deletions and corrections can be sent to the SCBA webmanager (see contact information below).

How long we keep your data for, and why?

Any EBU member that ceases to have Surrey as their primary county of affiliation will have their personal record deleted from Surrey's Bridgewebs database as part of our routine maintenance. We retain information supplied directly to us and not obtained from the EBU until advised by, or on behalf of, the individual concerned. Historical ranking lists and prize lists are required for archiving purposes and names cannot be removed from them.

Can you download your data to use it elsewhere?

The SCBA holds limited personal data and it is not possible for you 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".

Changes to our privacy notice

We keep this privacy notice under regular review and will place any updates on our website http://www.bridgewebs.com/surrey/

This privacy notice was last updated on 16 December 2019.

Contact information

SCBA web manager (webmanager.scba@bridgewebs.com)

EBU (for updating membership records): Postal address: Broadfields, Bicester Road, Aylesbury, Bucks, HP19 8AZ. Telephone 01296 317200

www.ebu.co.uk

Complaints

We seek to resolve directly all complaints about how we handle your personal information but you also have the right to lodge a complaint with the Information Commissioner's Office at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Telephone - 0303 123 1113 (local rate) or 01625 545 745 Website: <u>https://ico.org.uk/concerns</u>