

3 Counties Bridge - GDPR Privacy Notice

1. What personal data does 3 Counties Bridge collect?

The data we routinely collect includes members' names, addresses, email addresses. 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, DBS checks done with the member's knowledge and permission, or tournament director roles. We will also keep information relating to disciplinary matters and sanctions.

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.

2. 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.

3. Who is your data shared with?

Your membership data is passed on to the EBU, of which you become a member when you join 3 Counties Bridge. 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 Surrey 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 and, unless you have chosen to have your NGS grade kept private, this may also be used for stratification and handicap purpose.

Some of your data will be available for use by Pianola & Bridgewebs acting as a Data Processor on our behalf. They are not free to pass this on to other organisations that are not connected with 3 Counties Bridge.

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

4. Where does this data come from?

Data for most of our members comes from them when they join 3 Counties Bridge or when they update their information either directly 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 3 Counties Bridge or when you updated your record with us.

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

5. How is your data stored?

This information is mainly stored in digital form on computers and in the form of written documents stored at Lothlorien, Barley Mow Hill, Arford Hants GU35 8AB. We use Pianola/Bridgewebs/other facility as our data processor for this purpose. Any information that is stored remotely is stored in compliance with the GDPR.

6. 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 3 Counties Bridge discharges its obligations under the GDPR is Douglas Wright.

7. Who has access to your data?

Members of the committee and staff of 3 Counties Bridge have access to members' data in order for them to carry out their legitimate tasks for the organisations.

8. What is the legal basis for collecting this data?

3 Counties Bridge 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.

Similarly, personnel data is kept in compliance with our legal obligations.

9. 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 Douglas Wright

You can contact us, 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.

10. Does 3 Counties Bridge 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 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 competitions (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 Douglas Wright.

11. 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 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.
- 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 3 Counties Bridge (we do not send any out on behalf of other organisations).

- Any of these options can be implemented for your club membership by contacting Douglas Wright.
- 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 membership@ebu.co.uk

12. 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 3 Counties Bridge 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.

13. 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.

14. 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 3 Counties Bridge contact Douglas Wright.