



Charity Number: 1179979

## **PRIVACY POLICY**

### **What personal data does County Bridge Club collect?**

The data we routinely collect includes members' names, addresses, email addresses and telephone numbers, and any previous/current clubs + English Bridge Union (EBU) number. We collect this data directly from our members when they join the club and obtain their consent in line with this Privacy Policy.

For members who play in online bridge games such as Bridge Base Online (BBO) and Realbridge, we collect member's usernames. BBO itself records all table history in our tournaments, including chat between individual players at a table. This can be accessed by club and EBU Tournament Directors (TDs) but will only be used for the purposes of disciplinary and ethics cases or resolving disputes. Any results data that has been made publicly available may also be used for disciplinary and ethics cases.

For some of our members we may have additional information such as committee memberships, teaching qualifications or tournament director roles. We will also keep information relating to disciplinary matters and sanctions.

We collect some personal data for the purposes of administration of bridge holidays.

We collect some personal data to support cashless payments, and invoice players for sessions played.

Conduct and/or disciplinary hearings will capture an individual(s) personal data. This is usually archived after completion in the event of a reoccurrence or re-opening of a case, or the requirement to reference it. Individuals involved in these procedures will sign a non-disclosure agreement, and safely dispose of any redundant documents asap.

Minutes and supporting documentation are created and retained and this may contain inclusion of individual personal data.

Personal data regarding Trustee/committee members is provided to the Charity Commission for purposes of governance.

For those who are on committees, have won prizes or awards, or have a biography for any other reason, we may have names/photographs of them on our website/newsletter/club noticeboard with their permission, or on the Honours Board, or on a trophy. We also have more general photos of bridge players where individual's privacy is covered by the club policy on consent to photography.

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. On occasion, successes are published in the club's newsletter to members.

Images and personal information are captured using our CCTV system for the purpose of security, crime detection, public safety and other legitimate reasons set out in our CCTV Policy and Notice.

### **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.

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

Your membership data is passed on to the EBU, of which you become a member when you join County Bridge Club. 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 Leicestershire Contract Bridge Association (LCBA) 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 purposes.

Club Members, once logged into the 'Members- only' section of the website can see other members names, email, address and phone numbers after specifically giving consent to this. Members can select not to appear to other members or by denying access to their phone number. Generally, a member's information is used by other members to find a partner for a playing session.

Some of your data will be available for use by 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 County Bridge Club, and a contract on commissioned processing of personal data (controller-processor agreement) is in place.

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 most of our members comes from them when they join County Bridge Club or when they update their information either directly or via their EBU record.

The information held by the EBU may be updated by County Bridge Club if you have given us 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 them when you joined County Bridge Club, or when you updated your record with us.

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 computers. Access is password protected (strong). Passwords change with each new change in officer role, and in addition annually. We use Bridgeweb as our data processor for this purpose. We have a signed data controller /processor agreement in line with UKGDPR. Some of this information, such as old application forms are paper records and stored securely in files at the club in compliance with the UK General Data Protection Regulations (UK GDPR) and retained by the Membership Secretary of County Bridge Club. The files are locked away within the CBC premises, with specific officers having access to the key (Chair, Membership secretary and club secretary).

Some archived information, such as past paper records of minutes are stored remotely in compliance with the UK GDPR.

Some financial records are stored remotely and in line with GDPR and in accordance with financial legal statute.

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

Under the UK GDPR we do not have a statutory requirement to have a Data Protection Officer. The person who is responsible for ensuring County Bridge Club discharges its obligations under the UK GDPR is the Chairman.

The Chairman is the person responsible for maintaining a log of data breaches and notifying the Information Commissioners Office (ICO) and any members affected as necessary.

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

Only people in the club with specific roles/permissions have access to member data, in order for them to carry out their legitimate tasks for the organisation, and members who give consent to share their details on the members only section of the website.

Sub-contractors of County Bridge club 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?**

County Bridge Club 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 or any personnel data, the basis for its collection and retention is to comply with our legal obligations.

For data that may be made publicly available, and which is not covered by the two bases above, *consent* will be sought and will provide the lawful basis for its processing

## **How can you check what data we have about you?**

If you want to see the basic membership data we hold about you, you should contact the Membership Secretary.

You can contact us and asking for a [Subject Access Request](#) if you want to ask us to provide you with any other information, we hold about you. You can do this by letter, email or verbally to the Membership Secretary.

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 (30 days).

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 Leicester County Bridge Club collect any “special” data?**

The UK GDPR refers to sensitive personal data as “special categories of personal data”. We do not record any such special data. The only data we might from time to time 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 the Membership Secretary.

## **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 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 future Master Point promotions lists and for your Master Point rank not to be publicly listed.
- You may choose not to receive information emails from Leicester County Bridge Club (We do not send any out on behalf of other organisations).
- Any of these options can be implemented for your club membership by contacting the Membership Secretary.
- 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 directly [membership@ebu.co.uk](mailto:membership@ebu.co.uk)

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

We normally keep members' data after their membership lapses in case they later wish to re-join. However, we will delete any former member's contact details entirely on request.

For members who move out of the area, or are deceased, as soon as notification is received, their membership status is updated accordingly, and their email address is deleted from the CBC data. Telephone numbers are retained on a need-to-know basis following notification eg to allow any necessary contact with next of kin, after which they too will be deleted.

Financial data for the purposes of keeping the financial records of the club are retained for 6 years in line with financial statute.

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 County Bridge Club 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.

### **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 County Bridge Club contact the Chairman.

CBC/IC Feb 2022