

# GENERAL DATA PROTECTION REGULATION – CBAI

## What is GDPR?

The General Data Protection Regulation (GDPR) is a new EU regulation which came into effect on 25 May 2018. GDPR will update existing data protection laws and will place greater accountability and transparency obligations on organisations when using a member's personal information. It gives individuals greater control over their personal information.

This will apply to all clubs, groupings of clubs e.g. Counties/Regions and the Contract Bridge Association of Ireland. Each of these is identified as Data Controllers and has responsibilities in respect to the data they hold. It is possible that the entity operating as the first grouping of clubs, (County, Region, etc.) may not require separate identification as a Data Controller from the NBO, but the responsibility of safeguarding personal data is in no way diminished.

## Overview –

All information that is collected on an individual member is regarded as Personal Data. It must be kept secure and only to be used for the express purpose for which it was collected – bridge or other activities for the body involved. Similarly, if you have a visitor/guest to your club, his or her information is also personal data.

Do not pass on any Personal Data to anyone unless the purpose was specifically covered when the information was collected.

## Maintenance of Records

If you keep paper records, they should be kept in a secure location, e.g. locked in a cabinet, with regulated key holders for the location. If you dispose of any of these paper records, they must be shredded before disposal.

If you keep your records on a computer, they should only be accessible by authorised people; the computer and/or folders in which the information is kept should be locked and/or encrypted.

Access to records should only be available to authorised committee members, Officers or managers. When new individuals take up these positions access methods e.g. passwords, should be changed.

## Usage of Personal Data

When using personal data entrusted to you, care must be taken not to share any information with others, either deliberately or by accident; for example, if sending a group email, the blind carbon copy (bcc) facility or a mailshot programme that does not show other addressees must be used.

Clubs should not circulate lists of members with contact details within their own membership – *unless* they have specific agreement from their members. Clubs should regard this time as being a completely fresh start for all their practices, seeking specific permission from members to make use of their personal data. Previous practice of “opting out” will no longer apply – all members must be asked to “opt in” – by specifically giving permission to use personal data.

You must inform everyone from whom you collect data:

- The legal basis for doing so;
- What data you collect;
- How it is stored;
- To whom you pass it on and for what purpose;
- For how long you keep the data;
- What they can do to limit how you use your data.

This will usually be done via a **Privacy Notice**, which may be on your club's website, but a printed copy should also be available in the club and be sent to those who request it. Your members should be directed to this Privacy Notice on every occasion when you collect data, so it should be referred to on your membership application form. A Privacy Notice will also be displayed on the CBAI Website.

*Template for Club Privacy Notice is attached.*

## **Publication of Personal Data**

In a situation where a member is an office holder in a club or other grouping, and it is necessary to publish contact information for him or her either on paper or on another medium, specific permission **must** be sought from the individual for that purpose.

## **MEMBERSHIP FORMS**

Your application form for membership at Club level should contain a request for permission to use Personal Data for purposes of bridge and include a request for permission to reproduce photographs of members to record their winning of a prize or prizes for bridge and promotion of bridge.

*See format below. This form will be printed and circulated to all Clubs for ALL Club members to complete. It will be in two parts – the original to be retained by the club and the copy to be returned to the CBAI.*

## **RIGHTS OF THE INDIVIDUAL**

An individual has a right to data protection when his or her details are

- held on a computer
- held on paper or other manual form as part of a filing system and
- made up of photographs or video recordings of their image or recordings of their voice

Data Protection rights help the individual to make sure the information stored about them is

- factually correct
- only available to those who should have it
- only used for stated purposes.

The bridge grouping (Data Controller) who holds information about the individual must –

- obtain and use the information fairly
- keep it for usage only for bridge purposes
- get permission before sending emails to your computer or text messages to your mobile phone.
- keep the information safe
- make sure that any information is relevant, factually correct and up-to-date
- give the individual a copy of his or her personal information when requested.

## **REGISTRATION WITH DATA PROTECTION COMMISSIONER**

Bridge organisations do not fall within any category that requires registration with the Data Protection Commissioner, so that is usually not necessary. To satisfy yourselves that this is the case, check with the Regulator. (Website details below)

[www.dataprotection.ie](http://www.dataprotection.ie)