# Malahide Regional Bridge Club



## MRBC Privacy Policy – May 2018

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### 1 WHAT PERSONAL DATA DOES MALAHIDE REGIONAL BRIDGE CLUB COLLECT?

The data we routinely collect includes members' names, addresses, email address, landline and/or mobile number. 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, 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 on the club's noticeboard and on our website and used in maintaining the CBAI's Master Point scheme.

For security purposes we use CCTV to capture images of members and visitors to our club premises and car park.

#### 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 CBAI for their use as explained in the section below.

### 3 WHO IS YOUR DATA SHARED WITH?

Your membership data is passed on to CBAI, of which you become a member when you join Malahide Regional Bridge Club. CBAI shares data with Dublin North Region or any other Region in which you may have joined a club.

Information from your results is also passed on to CBAI for use in its master point scheme and, this may also be used for seeding /stratification and handicap purposes.

Some of your data will be available for use by Bridgewebs to display on our website acting as a Data Processor on our behalf. They are not free to pass this on to other organisations that are not connected with Malahide Regional Bridge Club.

Since the creation of our website members have voluntarily input personal data to be shared with other fellow members. This data can continue to be shared with club members or can be hidden from club members if a member so wishes. The membership section of our club website is password protected.

Photographs of major event winners and of members attending social events are shown on our Club website, unless a member requests that their photographs are excluded from being shown.

Security camera images are passed to the Gardai when requested in the pursuit of criminal activity or our lawyers in the case of insurance claims.

In the event that a club member agrees to act as a Council Member or Captain or any official capacity, it is necessary to have specific permission from them to use their contact information on behalf of the other members of the Club



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 Malahide Regional Bridge Club or when they update their information either directly with the Club or CBAI.

The information held by CBAI will be updated by your club, if you provide updates. 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 written documents stored locally for administration purposes and at CBAI headquarters. We also use Bridgewebs as our data processor for competition results displayed on our club website. 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 Malahide Regional Bridge Club discharges its obligations under the GDPR is our Club Secretary.

### 7 WHO HAS ACCESS TO YOUR DATA?

Members of the Council and other authorised club members of Malahide Regional Bridge Club have access to members' data in order for them to carry out their legitimate tasks for the Club and CBAI.

Members personal data voluntarily entered on our website by the member is available to fellow members to access. The data is password protected and is available only to members.

### 8 WHAT IS THE LEGAL BASIS FOR COLLECTING THIS DATA?

Malahide Regional 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, the basis for its collection and retention is to comply with the successful running of the club.



### 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 the Club Secretary. You can contact us with a *Subject Access Request* 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.

### 10 DOES MALAHIDE REGIONAL BRIDGE CLUB 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.

### 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.

- 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.
- You may choose not to receive information emails from Malahide Regional Bridge Club or CBAI (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 Club Secretary.

### 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 Master Points Scheme are deleted by MRBC after two years.

This data is not deleted by CBAI 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 by CBAI 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 nextof-kin to delete it we will do so, on the same basis as <u>when requested to remove</u> <u>data by a former member</u>.



Personal data, consented by next-of-kin only, held in the Obituary Section of our club website will be removed if requested by the next-of-kin.