

Sussex County Contract Bridge Association (SCCBA)

General Data Protection Regulation 2018 - Privacy Notice

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What personal data does Sussex County Contract Bridge Association (SCCBA) collect?

The data the Association routinely collects includes members' names, addresses, email addresses, membership numbers allocated by the English Bridge Union (EBU) and dates of birth. We collect this data directly from the EBU, our members and via our affiliated clubs. We also store data from those contacts who have given the SCCBA their information when making enquiries, registering for events or registering as dual members.

Some of the data collected applies to junior members (aged under 25) and our commitment to compliance with the EBU's Youth Policy is relevant to those members. We may also collect other information regarding those attending youth bridge camps, including parents, grandparents, or guardians of those attending.

For some of our members we may have additional information such as committee memberships, teaching providers or tournament directors.

We will also keep information relating to disciplinary matters and sanctions.

For those who apply to become Officers of the Association or members of its management committee we collect related personal data on nomination/application forms.

For those who are on committees, have won prizes or awards or have a biography for any other reason, we may have photographs of them.

We collect scoring data from SCCBA games you play in, which is used by us to publish results and, by the EBU, to maintain the National Grading Scheme (NGS) and the Master Point scheme.

What is this personal data used for?

We use members' data for the administration of your membership; the communication of information, including sending SCCBA Yearbooks; and the organisation of competitions and other events. This may involve the use of specialised software packages e.g. Bridgewebs for web site content and Gmail for membership mailings.

Who is your data shared with?

Unless you have chosen to have your NGS grade kept private or your Master Point rank hidden, information that derives from scoring, such as Master Point rank or NGS, is listed with the SCCBA and is publicly available on the EBU website. This is also available to bridge scoring program users for stratification and handicap purposes.

A limited amount of information (name, EBU number, county, post town) is listed in the database made available for use by scoring programs. This is to allow the correct identification of players for scoring purposes.

Some of your data will be available for use by organisations that act as Data Processors on our behalf, such as BridgeWebs. They are not free to pass these on to other organisations without our permission and that would only be given where it would be consistent with all other aspects of this Privacy Notice.

Some of your data may be made available to other county bridge associations affiliated to the EBU to assist the management of related competitions.

Your personal data is not provided by us for use by any organisations other than those indicated above, even if connected with bridge.

Where does this data come from?

Data for most of our members comes from their affiliated clubs, through whom their EBU/SCCBA membership is gained. You can change the data in your club record directly in My EBU or by the club if you gave it permission to make these changes when you joined or subsequently. You can change this permission in My EBU by going to Account -> My Details. Otherwise, your EBU/SCCBA data can only be updated by you contacting the SCCBA and telling us what information needs to be passed on to the EBU to update your records.

Members of our committees and other working groups may provide additional information when they are elected or appointed.

If you are a Direct Member, you will have provided your personal data directly to the EBU (SCCBA) when you joined, or when you updated your record.

Scoring data from all the sessions you play in at SCCBA events or heats of SCCBA events at affiliated clubs is provided to the SCCBA electronically by the host organisation of the game in question – usually a local club or the SCCBA.

How is your data stored?

Most of our data, including our main membership database, is stored in local password-protected digital form in compliance with the GDPR. The devices involved may be local PCs used by administrators, laptop PCs used by Directors and Scorers or off line back-up devices. Some data, eg photographs of prize winners, may be stored only temporarily within the device used to take the photograph.

We also have a few other small databases for specific purposes, for example our competition organisers have databases that have a limited amount of information for those of our members who regularly play in SCCBA events, which enables us to contact them.

Some of our data such as minutes of committee meetings, policy papers, score data and financial reports is also kept in the form of written documents stored securely by the appropriate administrator for historical reasons.

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 SCCBA Membership Secretary is responsible for ensuring compliance with data protection legislation on behalf of the Management Committee. The latter establishes the policies, processes and procedures which aim to achieve compliance.

The person who is responsible for ensuring the EBU discharges its obligations under the GDPR is the General Manager and the equivalent role for EBED is taken by its Chief Executive Officer. They are the people who are responsible for maintaining a log of data breaches and notifying the ICO and any members affected as necessary, in accordance with our legal obligations.

Who has access to your data?

Access to the digital devices used to store the data is restricted to those who require access for the discharge of their responsibilities and passwords are changed whenever there is a change in the allocation of responsibilities.

The SCCBA Membership Secretary, Officers, Members of the Management and other committees, Tournament Organisers and Directors and Scorers operating on behalf of the SCCBA have access to members' data in order for them to carry out their legitimate tasks for the Association, such as responding to enquiries from those members.

Where you are a member of an SCCBA committee, working group or other community of interest your email address will be shared with other members of your committee or group to facilitate mutual awareness and inter-communication.

Members of EBU committees, the board of the EBU and the trustees of EBED will be given access to this data for any legitimate purpose to do with their roles as officers of the organisations or members of their committees but will not be free to pass this on to any other organisation.

Organisers, Directors and Scorers of events can access the EBU database that provides the limited information necessary for them to correctly identify players. This information may be further limited by members choosing to have their NGS grade or Master Point rank kept private, or by choosing to become an anonymous member.

Sub-contractors of the SCCBA may be given access to data for specific tasks, such as mailing copies of the Yearbook on our behalf. They are not allowed to use it for any other purpose.

What is the legal basis for collecting this data?

Sussex County Contract Bridge Association is a Constituent Member of the English Bridge Union Ltd. as defined in the Bye-Laws of the English Bridge Union Ltd.

The SCCBA collects personal data that is necessary for the purposes of its legitimate interests as a membership organisation. For some data, such as that relating to financial matters, the basis for collection and retention is to comply with our legal obligations.

How you can check what data we have about you?

If you want to see the basic membership data we hold about you, you can log in to My EBU and go to Account -> My Details. There you can also update most of your details or change the permissions you wish to grant for the use of your data.

You can contact the SCCBA via the SCCBA website using the 'Contact Us' tab within the Administration entry in the Contents menu if you want to ask us to provide you with any 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.

Does the SCCBA collect any "special" data?

The GDPR refers to sensitive personal data as "special categories of personal data". Of these categories, the only data we record relates to the disabilities of some of our members when they 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 EBU Office Manager or the SCCBA 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 are used. Most of these relate to EBU facilities as listed below:

- 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 EBU 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 are able to provide you with in the way of written information, so you would not be able to get the English Bridge magazine in printed form or any other member benefits that require a postal 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, but if you

do this you would not be able to benefit from any stratification or special prizes based on it. 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, but if you do this you would not be able to benefit from any stratification or special prizes based on it.
- You may choose not to receive information emails from the EBU and EBED (we do not send any out on behalf of other organisations).
- Any of these options can be implemented 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 Office Manager.

You may also ask that any photograph of you that appears on a website be deleted by contacting the EBU Office Manager in relation to the EBU website or the SCCBA Webmaster.

How long do we keep your data, and why?

We keep your data for as long as is appropriate for the conduct of our business.

Subject to the need to resolve any matters outstanding, we do not keep members' data after they resign.

Historical ranking lists and prize lists are required for archiving purposes and names cannot be removed from them. Similarly, archived news articles, whether on the website, or in the SCCBA's magazines (both printed and online), will not usually be deleted.

Other data, such as that relating to accounting matters, is kept for at least the legally required or recommended period, 7 years for financial transactions.

What happens if a member dies?

We do not keep members' information after they die.

SCCBA Management Committee

3 May 2019