



## PRIVACY POLICY

### 1. What personal data does Warwickshire County Bridge Association (WCBA) collect?

a) The data collected by WCBA includes:

- i. Associate (Dual) Members' names, addresses, telephone numbers (home and mobile) email addresses and, in the case of junior members, dates of birth, category of membership, and, if applicable, subscription payment information (NB the County does not process credit/debit card information in any form).
- ii. Course & Event Attendees' names, addresses, telephone numbers (home and mobile) email addresses and, in the case of junior members, dates of birth, and details of the course/event and any related and relevant information.
- iii. Associates' (being a person who supports one or more of the County's activities, but who is not a member of the County) names addresses, telephone numbers (home and mobile), email addresses and, in the case of juniors, dates of birth.
- iv. Primary Members' (Members whose county of primary allegiance is Warwickshire) data is supplied to WCBA by the English Bridge Union (EBU) via the County's online account. The EBU provides a shared access account to the County for use by nominated officials (Chairman, Secretary, Treasurer, Competitions Secretary, Player Development Officer, Youth Officer, Match Secretary, League Secretary, and other nominated Committee members).
- v. Where applicable reference to data includes that directly collected and that supplied to the County by the EBU or EBED (English Bridge Education & Development).
- vi. That supplied by Clubs for the purposes of their members entering WCBA events. This data will include, name, email address, telephone number(s), and any relevant data to the event entered (eg county of primary allegiance, NGS grade, Master point grade and, in regard to juniors, date of birth).
- vii. Contact information, name, email address, and telephone number(s) of committee members and event organisers will be collected and shared with other committee members. If you do not wish your telephone number and/or personal email address to be used in this way please inform the County of an alternative telephone number and email address for this purpose.

b) In all cases the County collects playing data from bridge sessions which it then uploads to the EBU for the purposes of Universal Membership Fees, the National Grading Scheme (NGS) and Master Point scheme.

c) The County does not allow players to play in any event under a pseudonym unless it is a pseudonym that is registered with the EBU and has a corresponding, and valid, EBU number.

- d) For some of our members/associates additional information is held such as committee memberships, teaching qualifications, DBS checks - done with the knowledge and permission of the individual - or tournament director roles. Information relating to disciplinary matters and sanctions is also stored.
- e) For those people who have participated in, or won, an event, or events (internal or external), photographs may be taken for use in publicity, present or future. More general photographs of events may also be stored for such use. Consent to the taking and storing of photographs is implied unless the County/photographer is expressly advised.
  - i. Arrangements relating to Junior Members are handled on a case by case basis. See <http://www.warwickshirebridge.co.uk/docs/Youth/WCBA%20Junior%20Bridge%20Development%20Policy.pdf>

## **2. What is this personal data used for?**

- a) Your data is used for the administration of your membership; the communication of information, including sending notices of meetings, subscription renewals, event information, offer(s) from our sponsors; and the organisation of courses, competitions and other events. A limited amount of data is used by scoring programs to ensure that members' results are correctly attributed to them.
- b) Your name, email address and telephone number provided on entry, will be shared with other entrants where appropriate. If you do not wish this to be so, please nominate another member of your team who is willing to share the necessary data to allow the arranging of matches, etc, to act as captain.

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

- a) Data relating to the sessions of bridge you participate in, or chose to participate in, or are selected to participate in, including your name, and sometimes photographs, are uploaded to the County Website (and, sometimes, Clubs, the EBU and special event Websites). Data in relation to events you participate in is shared with the EBU. Any amendments to data held with the EBU are the responsibility of the member to manage. Please see the EBU's Privacy Policy (<http://www.ebu.co.uk/gdpr/privacy-policy#access>).
- b) Unless you chose (within the EBU domain) 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 your County of affiliation and is publicly available. This is also available to bridge scoring program users for stratification and handicap purposes.
- c) 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.
- d) If you attend lessons, courses, or events, your data may be shared with the EBU and/or EBED. This includes, but is not limited to, Bridge Lessons/Seminars, Tournament Director Training, Safeguarding Training, etc.

- e) Some of your data will be available for use by organisations that act as Data Processors on behalf, of the English Bridge Union, such as Bridgewebs. These Data Processors are not authorised to pass your information on to other organisations that are not connected with the EBU.
- f) A player who enters a WCBA event automatically authorises certain information related to membership and/or bridge administration to be shared with the EBU and WCBA. This includes, name, email address, telephone number and, in the case of juniors, date of birth. In addition, NGS and MasterPoint data. In some situations, proof of entry eligibility may be required (eg date of birth in a senior event).
- g) A player who enters an event, or registers on a course, agrees, in so doing, to his or her name being added to a publicly displayed list, or commentary, on a notice board, and/or website, and on appeals forms and report forms associated with the running of an event. The latter being used for internal use only.
- h) A player who enters a teams competition, your name, telephone number, and email address will be shared among other entrants to the league/competition.
- i) Selected members of the Executive Committee, Committee Members, and event organisers may have their name, contact number and email address displayed on the website for the purposes of player contact. If you do not wish your telephone number and/or personal email address to be used in this way please inform the County of an alternative telephone number and email address for this purpose.
- j) The County will not supply your personal data to anyone else other than those indicated above, even if connected with bridge.
- k) The County may use your data to send you information on behalf of any of its Sponsors. Data will never be passed to a Sponsor. If you do not wish to receive such information please let the County know, [data@warwickshirebridge.co.uk](mailto:data@warwickshirebridge.co.uk).

#### **4. Where does this data come from?**

- a) Data is collected from a range of sources:
  - i. Direct from the player
  - ii. EBU or EBED
  - iii. Affiliated and Unaffiliated Clubs
  - iv. Associate Membership Applications
  - v. Course Application forms/emails
  - vi. Event organisers
  - vii. Event photographers
- b) Scoring data from all the games you play in is provided to the EBU electronically by the sponsoring organisation of the game in question – usually a local club or a county. This may be done by uploading a scoring file directly from the scoring program to the EBU website, or by uploading the file to the club's My EBU, or by using a third-party processor such as Bridgewebs.

## **5. How is your data stored?**

- a) Most data, including the membership database, is stored in digital form on computers, and using Dropbox, a 'cloud' based storage medium, which is compliant with the General Data Protection Regulation (GDPR).
- b) Information relating to sessions of bridge are stored, in perpetuity, on the website – this includes photographs. Certain data will be removed upon deletion of a member, but ranking lists will still contain the person's name.
- c) The remainder of data is kept in the form of written documents stored at the home address of one or more members of the Executive Committee.

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

- a) Under the GDPR (General Data Protection Regulation) there is no statutory requirement to have a Data Protection Officer. The Officers of the Executive Committee are collectively responsible for ensuring the County discharges its obligations under the GDPR and 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.

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

- a) Selected Executive Committee Members and selected committee members have access to your information for purposes associated with Bridge. For example, the Player Development Officer will have access to the data relating to members attending newcomer events and classes throughout the County.
- b) Organisers of events are able to 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.
- c) Selected members of the Executive Committee, Committee Members, and event organisers may have their name, contact number and email address displayed on the website for the purposes of player contact. If you do not wish your telephone number and/or personal email address to be used in this way please inform the County of an alternative telephone number and email address for this purpose.

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

- a) WCBA collects personal data that is necessary for the purposes of its legitimate interests as a County representing its members and as an entity organising an internationally recognised and regulated, competitive mind sport.
- b) For some data, such as that relating to financial matters, the basis for its collection and retention is to comply with our legal obligations.
- c) Similarly, personnel data is kept in compliance with our legal obligations.

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

- a) You can contact the County, [data@warwickshirebridge.co.uk](mailto:data@warwickshirebridge.co.uk), with a 'Subject Access Request' 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.
- b) 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 the County collect any 'special' data?**

- a) The GDPR refers to sensitive personal data as "special categories of personal data".
- b) Of these categories, the only data the County record may contain information relating to the disabilities or dietary requirements of some of our members when they have provided it for the purpose of, for example, seating. If you wish to change this data on your record you can do so at any time by contacting [data@warwickshirebridge.co.uk](mailto:data@warwickshirebridge.co.uk).

## **11. Can you ask for your data to be removed or limited?**

- a) Yes. But you would terminate your Associate membership of the County, which you can do at any time and ask that your data be removed. However, the County will retain a record of your name, EBU number, period of membership, details of any disciplinary actions, along with the termination request, in order to determine any future membership request.
- b) If the removal of data relates to announcements on the website, or notice board, or photos, this will normally be actioned within 7 days.
- c) Access to personal details of Junior Members is limited.
- d) In relation to Members of Primary Allegiance - Please see the EBU's Privacy Policy, <http://www.ebu.co.uk/gdpr/privacy-policy#access>, for details of how to remove or limit your data held by them.

## **12. Can you ask for your data to be corrected?**

- a) Yes. And this will normally be actioned within 7 days. Please send your request to [data@warwickshirebridge.co.uk](mailto:data@warwickshirebridge.co.uk), or write to the Secretary, with a 'Subject Amendment Request'.
- b) Corrections to data held by the EBU must be directed to them. Please see the EBU's Privacy Policy, <http://www.ebu.co.uk/gdpr/privacy-policy#access>, for details of how to amend your data held by them.

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

- a) Members' data is retained after they resign or their membership lapses. This is because members sometimes later wish to re-join (occasionally after several decades) and previous information is necessary to determine if said member should be readmitted.
- b) Historical ranking lists, prize lists, event photographs, and website announcements, are required for archiving purposes and names cannot normally be removed from them. However, if requested, names can be removed from photographs.

### **14. What happens if a member dies?**

- a) Members' information is deleted after they die, save in 13a above.
- b) Some Members may have an obituary, which is included on the website in honour of the member concerned. Obituaries will not be removed unless there is an exceptional circumstance as determined by the Executive Committee, and as notified by those responsible for the Estate of the deceased.

Adopted by Executive Committee: **24 April 2023**

Review: Annually