

Privacy Policy for Gloucestershire County Bridge Association (GCBA)

Statement of Compliance - General Data Protection Regulation (GDPR)

We will comply with Data Protection Law when it comes to processing your data; this says that personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you, and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

What personal data does GCBA collect?

The data we routinely collect includes members' names, addresses and email addresses. We collect this data via the English Bridge Union (EBU), or people who join the county directly or enter competitions.

For Safeguarding reasons, for Juniors only (under 18), we collect dates of birth; we keep email and other contact details from their parents only, and we do not communicate directly with minors by email. Consent re use of photos is requested from the parents of juniors on their behalf.

For some of our members we may have additional information such as committee memberships, teaching qualifications, DBS checks done with the member's knowledge and permission, or tournament director qualifications and roles. We will also keep information relating to disciplinary matters and sanctions.

We collect the scores from games members play, which are displayed on our results pages and used in maintaining the EBU's National Grading Scheme (NGS) and the Master Point scheme.

What is this personal data used for?

We use members' data for the administration of their membership, the communication of information, and the organisation of events.

With whom is your data shared?

Some of your data will be available for use by Pianola or Bridgwebs acting as a Data Processor on our behalf. They are not free to pass this on to other organisations that are not connected with GCBA. Your personal data is not passed on by us to any other organisation, whether or not connected with bridge, unless legally obliged to do so.

Information from your results is passed on to the EBU for use in its master point and NGS schemes.

Where does this data come from?

Data for most of our members comes from them when they join an EBU affiliated club or when they update their information either directly or via their EBU record. All that personal information is collected and collated by the EBU. The EBU makes available to GCBA the personal information held by them for any player who declares allegiance to Gloucestershire as a county.

The information held by the EBU may be updated by your club if you have given it permission to change your record. You can change this permission on My EBU by going to Account -> My Details, or by phoning the EBU office on 01296 317200. GCBA does not have access to make changes to your record on the EBU database.

Scoring data comes directly from the results of the GCBA games in which you play.

How is your data stored?

This information is mainly stored in digital form on the Cheltenham Bridge Club's computers and Cloud storage using Dropbox and in the form of written documents stored at Cheltenham Bridge Club, 4 Tivoli Road, Cheltenham, GL50 2TG. We use Pianola and Bridgeweb as our data processors for scoring purposes. Any information that is stored remotely is stored in the EU in compliance with the GDPR.

The EBU captures more personal information than GCBA needs, and GCBA only stores and uses the information it needs. The EBU makes the other personal information it has for GCBA members available to GCBA but this is not stored or controlled by GCBA.

Pianola's policy on storage and processing of data can be viewed here: <http://support.pianola.net/>

Bridgeweb's policy on storage and processing of data can be viewed here: <http://>

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

Under the GDPR we do not have a statutory requirement to have a Data Protection Officer. The person who is responsible for ensuring GCBA discharges its obligations under the GDPR is Jim Simons.

Who has access to your data?

Specific members of the GCBA Committee have access to members' data in order for them to carry out their legitimate tasks for GCBA. Permissions and passwords are restricted to those required for the tasks; these passwords are changed annually after the AGM.

What is the legal basis for collecting this data?

GCBA 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 our legal obligations.

Similarly, personnel data is kept in compliance 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 should contact the Secretary of GCBA (via secretary@gcba.org.uk).

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.

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 GCBA 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 of these categories. The only data we record relates to the disabilities of players who have explicitly requested it to be recorded. If you wish to change this data on your record you can do so at any time by contacting the Secretary of GCBA (via secretary@gcba.org.uk).

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 of the EBU. 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. 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 for example 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 (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. You can change this option in My EBU as often as you wish.
- You may choose not to appear in master point promotions lists.
- You may choose not to receive information emails from GCBA (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 membership@ebu.co.uk

GCBA collects the vast majority of its members’ data via the EBU, and GCBA is therefore reliant on them for the accuracy and timeliness of that data. Members are encouraged to ensure that their details are accurately maintained with the EBU, but may additionally provide updates or requests for removal or deletion direct to the Secretary of GCBA if they wish.

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.

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.

What happens if a member dies?

We normally keep members’ information after they die. If requested by their next-of-kin to delete it we will do so on the same basis as when requested to remove data by a former member.

Can you download your data to use it elsewhere?

GCBA holds limited personal data and it is not possible to download this data. However 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".

Similar session data is available from Bridgewebs and Pianola for players registered with those organisations.

Appendix 1: Cheltenham Congress and Green Point Events

<to be revised>

GCBA organises the Cheltenham Congress, and, with Herefordshire CBA the Ross-on-Wye Green Point Weekend; the Congress is managed by the <bbc>.

For the purposes of GDPR, these organisers keep only email addresses (unless visiting players provide us with telephone numbers or addresses), stored as above in Pianola. For the purposes of the Malvern Congress, any requests to remove data or data-access requests should be addressed to the Congress Secretary (see website). Consent for storage of data (including photos) will be via entry forms. Results and winners' records cannot be deleted, as they form part of the archive.