



# Hungerford Bridge Club

## Privacy Notice for Hungerford Bridge Club

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## **What personal data does Hungerford Bridge Club collect?**

The data we routinely collect includes members' names, addresses, email addresses. 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 done with the member's knowledge and permission, 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 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 your membership; the communication of information, and the organisation of events. We provide your data to the English Bridge Union (EBU) for their use as explained in the section below.

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

Your membership data is passed on to the EBU, of which you become a member when you join Hungerford Bridge Club. The EBU shares data with its associated charity, English Bridge Education and Development (EBED), since it shares offices and data systems with them, and also with Berks & Bucks or any other county that you may have nominated as your county of allegiance.

Information from your results is also passed on to the EBU for use in its master point and NGS schemes and, unless you have chosen to have your NGS grade kept private, this may also be used for stratification and handicap purposes,.

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

Your personal data is not passed on by us to organisations other than those indicated above, whether or not connected with bridge.

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

Data for most of our members comes from them when they join Hungerford Bridge Club or when they update their information either directly or via their EBU record.

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.

If you are a direct member of the EBU, you will instead have provided your personal data directly to us when you joined Hungerford Bridge Club, or when you updated your record with us.

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

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

This information is mainly stored in digital form on computers and in the form of written documents stored at club officers' homes. We use Bridgewebs as our data processor for this purpose. Any information that is stored remotely (e.g. by the EBU) is stored in compliance with the GDPR.

## **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 Hungerford Bridge Club discharges its obligations under the GDPR is the Membership Secretary, supported by the Chairman and the committee.

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

Members of the committee of Hungerford Bridge Club have access to members' data in order for them to carry out their legitimate tasks for the organisation.

Like many other clubs with a Bridgewebs website, the website for Hungerford Bridge Club contains a full list of members and, normally, their emails and phone numbers which club members can access using a password via the Members Only tab. This enables Members to contact each another for such things as arranging partners and resolving scoring queries after the event. Every member can access his/her own record and add or remove all personal contact information.

Like many other clubs Hungerford Bridge Club uses a computer scoring program which contains a full list of members and their EBU numbers, but not personal contact data such as their emails and phone numbers. This program is only available to the Clubs designated Scorers who need a password to access the computers where this information is held.

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

Hungerford 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 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 Membership 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.

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 Hungerford 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.

## 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. 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 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, but of course this would limit what we and the EBU are able to provide you with in the way of written information, so you would not be able to get *English Bridge* in printed form or any other benefits that require a mailing address.
  - Note that we do not send out emails on behalf of other organisations but we do require an email address for effective administration of the club
- 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 as often as you wish.
- You may choose not to appear in master point promotions lists.
- Any of these options can be implemented for your club membership by contacting the Membership Secretary.
- Any of these options can be implemented for your EBU membership 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 the EBU to have. If you need any assistance with this you may contact the EBU Office Manager at [membership@ebu.co.uk](mailto:membership@ebu.co.uk)

### **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 NGS are not deleted by Hungerford Bridge Club or the EBU 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 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?**

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". To access data held by Hungerford Bridge Club contact the Membership Secretary.

#### **Version Control**

This version of the Hungerford Bridge Club GDPR Privacy Notice dated 16<sup>th</sup> January 2025 supersedes the previous version dated March 2018. It incorporates updated guidance from the EBU template of March 2019.