1. What personal data does SBC collect?

The data we routinely collect includes members' names, addresses, email addresses and telephone numbers. Any of this information can be amended on Pianola by members themselves or by contacting the Membership Secretary.

We collect the scores from games members' play, which are displayed in the **club**, on the results pages on **Pianola** and on the **SBC website**.

For some of our members we may have additional information such as committee memberships, teaching qualifications, <u>DBS checks</u> done with the members knowledge and permission, or tournament director roles. We also keep information relating to **disciplinary matters** and **sanctions** in accordance with our **constitution**.

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.

The EBU stores some personal data to allow the correct identification of players for scoring purposes. Results are used in maintaining NGS and the Master Point scheme, which may also be used for stratification and handicap purposes (unless you have chosen to have your NGS grade kept private).

None of the above are free to use it for any other purpose.

3. Who is your data shared with?

Some of your data will be available for use by Pianola who act as a Data Processor on SBC's behalf.

If you are not already a member of the EBU you become one when you join SBC and your personal data will be passed to the EBU database from Pianola. If you were already a member of the EBU, you will instead have provided your personal data to them **previously**.

When you join SBC your results are shared with the EBU and YCBA.

The EBU shares data with its associated charity **EBED**, since it shares offices and data systems with them. The EBU also passes data to **YCBA** or any other county that you may have nominated as your county of allegiance.

Contact data is passed on to a printing company who act as a data processor for printing our membership directory. However, you **must** give your **consent** before any of your contact data can be used in it.

All data that is shared is subject to the above organisations, abiding by the GDPR.

Your personal data is **not passed on** by us, or any of the above organisations, in any other circumstances, other than those indicated in the section above, whether or not connected with bridge, unless you give **separate consent**, or it is necessary to comply with **legal requirements** or in an **emergency**.

If you **consent** to act as a standby your name will appear on the standby list on the SBC website and in the club.

4. Where does this data come from?

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We collect your personal data from your **application form** when you join our club as a **full member**. If you have authorised it on the EBU database your NGS and EBU rank will be updated in both systems the day after you have played.

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

Personal data also comes from changes which are described in detail in the "How you can ask for data to be removed, limited or corrected".

5. How is your data stored?

Your information will mainly be recorded in **digital form on computers** (we use **Pianola** as our data processor for this purpose) in our membership database. Other data is in the form of **written documents** stored at SBC or remotely. Information in relation to **disciplinary** matters is stored securely at SBC.

All information is stored in compliance with the **GDPR**.

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

Under the **GDPR** we do **not** have a <u>statutory requirement to have a Data Protection Officer</u>. The person who is responsible for ensuring SBC discharges its obligations under the **GDPR** is the Membership Secretary.

7. Who has access to your data?

Members of the committee of SBC, our Data Website Manager and Chief Handicap Manager have access to members' data in order for them to carry out their legitimate tasks for the organisation.

Data processors of SBC, currently Pianola may be given access to data for specific tasks authorised by the committee such as sending mailings. A printing company that abides by the **GDPR** may be given access for printing our members directory.

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

SBC collects and uses your personal data in compliance with the **GDPR**. Our legal basis for processing this data is our *legitimate interests* as a membership organisation that participates in an internationally recognised and regulated, competitive mind sport.

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

If you want to see the basic membership data SBC hold about you, sign onto **Pianola**, click on the downward arrow on the top right of the screen, then click on 'My **Account**' and it will show you the personal details it holds. If you need help with this you should contact the Membership Secretary.

You can contact the chairman of SBC 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

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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 SBC 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 members, who have explicitly requested it to be recorded for the purpose of giving them stationary (or moving) positions in our competitions (which we aim to do wherever feasible). Any member who wishes to request a sitting (or moving) seat at SBC should submit a written request to the SBC committee explaining their reasons. If agreed it will be recorded in the minutes and their name added to the list on the T.D.'s noticeboard. If you wish to change this data on your record you can do so at any time by contacting the Membership Secretary.

11. How can you ask for data to be removed, limited or corrected?

SBC Data

You can amend your membership data on the SBC database by logging on to Pianola, selecting the downward arrow on the top right of the screen next to your name, —> 'My Account' —> 'My Details' and choose one of the following 5 options: 'Personal details', 'Bridge systems', 'Photo', 'Communication preferences' or 'Privacy'. Then go to the relevant data field you want to either add, amend or delete. Alternatively, contact the Membership Secretary to help. You can limit your contact details but we do need to have either your residential or email address to be able to contact you.

EBU Data

You can amend any of your membership data on the EBU database by logging on to 'My EBU', going to 'Account – > My Details' and either adding, amending or deleting data yourself. Alternatively, the information held by the EBU may be updated by SBC 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 need any assistance with this you may contact the EBU Office Manager membership@ebu.co.uk or phone the EBU office on 01296 317200.

When a club creates a new member's record, the club has the ability to make changes to that record on behalf of the member. If you would prefer the club not be able to update your personal information you can change your permissions by logging on to 'My EBU'. Equally if you are already a member of the EBU, via another affiliated bridge club or as a direct member, the club will not have full permission to view/edit your personal information. If you wish to give the club the ability to update/change your personal information, you can change your permissions by logging on to 'My EBU'.

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, they 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 the EBU are able to provide

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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.

- You do not need to provide the EBU 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, but if you do this you would be unable 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 master point promotions lists, 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 receive information emails from EBU (they do not send any out on behalf of other organisations).

12. How long do 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 SBC 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. There may be legal or other official reasons why we need to keep or use your data.

13. 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 shall do so on the same basis as when requested to remove data by a former member.

14. 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 SBC contact the Membership Secretary.

APPENDIX

SBC	Sheffield Bridge Club
EBU	The English Bridge Union (the governing body of the game of duplicate bridge)
NGS	National Grading Scheme
EBED	English Bridge Education and Development
YCBA	Yorkshire County Bridge Association
GDPR	General Data Protection Regulation

N.B. We keep our Privacy Policy under regular review and it was last updated on 29/04/18