

# **Privacy Policy for Berwick-upon-Tweed Bridge Club**

## **What personal data does Berwick-upon-Tweed Bridge Club collect?**

The data we routinely collect includes members' names, addresses, email addresses, and other contact details. 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 or tournament director roles.

We collect the scores from games you play, which are displayed on our results pages and used in maintaining the SBU 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 Scottish Bridge Union (SBU) for their use as explained in the section below.

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

Your membership data is passed on to the SBU, of which you become a member when you join Berwick-upon-Tweed Bridge Club. The SBU shares data with the East District or the district of your home club.

Information from your results is also passed on to the SBU for use in its master point scheme.

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

A limited number of email addresses are shared with Zoho to provide @berwickbridgeclub.co.uk email addresses. These are typically used by Committee members.

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 Berwick-upon-Tweed Bridge Club or when they update their information on Pianola.

The information held by the SBU may be updated by the club.

If you are a direct member of the SBU, you will instead have provided your personal data directly to us when you joined Berwick-upon-Tweed 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. We use Pianola as our data processor for this purpose. Any information that is stored remotely is stored in compliance with the Data Protection Act 2018 (DPA).

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

Under the DPA we do not have a statutory requirement to have a Data Protection Officer.

The Committee has decided to appoint a Data Protection Officer (DPO) who will inform and advise the Committee about their obligations to comply with the DPA and other data protection laws. The DPO will be the first point of contact for supervisory authorities and for members whose data is processed.

The DPO will also monitor compliance with the DPA and other data protection laws.

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

Members of the committee of Berwick-upon-Tweed Bridge Club have access to members' data in order for them to carry out their legitimate tasks for the club. Tournament directors have limited access to members' data for them to carry out their legitimate role when directing events.

Subcontractors of Berwick-upon-Tweed Bridge Club may be given access to data for specific tasks, such as sending mailings. They are not free to use it for any other purpose.

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

Berwick-upon-Tweed 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 Data Protection Officer ([gdpr@berwickbridgeclub.co.uk](mailto:gdpr@berwickbridgeclub.co.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 Berwick-upon-Tweed Bridge Club collect any "special" data?**

The DPA 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<sup>1</sup>. This would involve you having a pseudonym with an SBU number under which you would play. If you do this however, you would not be able to access any SBU membership benefits such as the SB News magazine or playing in SBU 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 SBU are able to provide you with in the way of written information, so you would not be able to get any 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.
- You may choose not to appear in master point promotions lists<sup>1</sup>.
- You may choose not to receive information emails from Berwick-upon-Tweed Bridge Club (we do not send any out on behalf of other organisations).
- Any of these options can be implemented for your club membership by contacting the Data Protection Officer ([gdpr@berwickbridgeclub.co.uk](mailto:gdpr@berwickbridgeclub.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 rejoin. However, we will delete any former members’ 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 are not deleted by Berwick-upon-Tweed Bridge Club or the SBU 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?

To access data held by Berwick-upon-Tweed Bridge Club contact the Data Protection Officer ([gdpr@berwickbridgeclub.co.uk](mailto:gdpr@berwickbridgeclub.co.uk)).

*The Berwick-upon-Tweed Bridge Club acknowledges the help of the English Bridge Union and Scottish Bridge Union in the preparation of this Privacy Policy.*

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<sup>1</sup> Assuming that the SBU offers this facility