



## Privacy Policy Statement

### 1. Introduction

- 1.1 The Data Protection Act 2018, which incorporates the European Union General Data Protection Regulation (GDPR) that replaces the 1998 Data Control Regulations, is designed for the protection of personal data and preventing it being accessed or used inappropriately and has been embraced by Hadley Wood Association Bridge Club (HWABC).
- 1.2 Under the GDPR we do not have a statutory requirement to have a Data Protection Officer. The person who is responsible for ensuring HWABC discharges its obligations under the GDPR is the committee Chairman.

### 2. Collection of Personal Data

- 2.1 HWABC 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.
- 2.2 For some data, such as that relating to financial matters, the basis for its collection and retention is to comply with our legal obligations.
- 2.3 Data for most of our members comes from them when they join HWABC 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.
- 2.4 If you are a direct member of the EBU, you will instead have provided your personal data directly to us when you joined HWABC, or when you updated your record with us.
- 2.5 The data includes members' names, address, email address, date of birth, and if relevant, additional information such as committee memberships, teaching qualifications, and tournament director roles, all with the member's knowledge and permission.
- 2.6 We also collect the scores from games each member plays, which are displayed on our results pages and used in maintaining the EBU's National Grading Scheme (NGS) and the Master Point scheme. This scoring data comes directly from the results of the club games.

- 2.7 We do not generally collect or record any sensitive personal data or what the GDPR refers to as "special categories of personal data". 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 positions in our competitions (which we aim to do wherever feasible). If a member wishes to change this data on their record they can do so at any time by contacting Chairman.

- 2.8 Information is mainly stored in digital form on computers and in the form of written documents stored with the committee.

### 3. Use and Sharing of Personal Data

- 3.1 Members of the committee of HWABC have access to members' data in order for them to carry out their legitimate tasks for the Club.
- 3.2 We use members' data for the administration of their membership, the communication of information, and the organisation of events.
- 3.3 Limited personal data (telephone number(s) and email address) is circulated as a contact list each year to all Club members for the purposes of arranging partnerships, and the like. Members can opt to limit such contact information being included in the contact list. Members are instructed that any personal information of other members is provided to them only for the purposes of arranging partnerships, and the like, and must not be shared for any other reason.
- 3.4 Members of HWABC become members of the English Bridge Union (EBU) when they join the Club and we provide our members' data to the EBU. 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 Herts Bridge Association or any other county that members may have nominated as their county of allegiance.
- 3.5 Information from members' results is also passed on to the EBU for use in its master point and NGS schemes, unless the member has chosen to have their NGS grade kept private, and this may also be used for stratification and handicap purposes.
- 3.6 Members' personal data is not passed on by us to organisations other than those indicated above, whether or not connected with bridge.



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- 4. Correction or Limitation of Personal Data held by HWABC**
- 4.1 Members may correct or update their personal data at any time and we will update our records without undue delay.
- 4.2 If a member wants to see what personal data we hold about them, they should contact the Chairman.
- 4.3 There are various ways in which members can limit how their data is used.
- a) They could become an “anonymous” member. This would involve them having a pseudonym with an EBU number under which they would play. If they do this however, they would not be able to access any EBU membership benefits such as the magazine or playing in EBU tournaments.
  - b) They could maintain their club membership with their correct name but with limited contact details. However, we do need to have at least one method of contacting members. Members 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 them with in the way of written information, so they would not be able to get English Bridge in printed form or any other benefits that require a mailing address.
  - c) Members do not need to provide us with their date of birth unless they wish to enter age-limited (junior or seniors) events or gain concessions based on age.
  - d) If they do not want their NGS grade to be public, members may choose for it to be kept private. Members can change this option as often as you wish.
  - e) They may choose not to appear in master point promotions lists.
  - f) Members may choose not to receive information emails from HWABC (we do not send any out on behalf of other organisations).
- 4.4 Any of these options can be implemented for club membership by contacting Chairman.
- 4.5 Any of these options can be implemented for EBU membership by logging on to My EBU, going to Account → My Details and editing the record there, either to correct erroneous data or to delete information the member does not wish the EBU to have.
- 4.6 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.
- 4.7 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 HWABC or the EBU although they will no longer be attributed to a player who does not want their data to be kept.
- 4.8 Historical ranking lists and prize lists are required for archiving purposes and names cannot be removed from them.
- 4.9 Other data, such as that relating to accounting or personnel matters, is kept for the legally required period.
- 4.10 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.