

# SBU Privacy Policy

April 2018 (modified July 2018)

## What personal data does the SBU collect from its members?

The data we routinely collect include members' full name, title, gender, membership type (junior or adult or senior), postal address, email address, and telephone number(s). For some of our members holding official positions or responsibilities we may hold additional information such as club official roles, committee memberships or tournament director roles.

We collect the scores from events that members play in, these are displayed on Club/District/SBU result pages. Scores are also needed to maintain the SBU Master Point ranking scheme.

## What is this personal data used for?

We use member contact data for the administration of your membership; communication of information; and the organisation of events. In other words, the kind of data that members would normally expect to be held by us in order for them to belong to a members' association which the SBU is.

## Who is your data shared with?

Your membership data is shared with, and used by, SBU officials, district organisers and home club officials, especially when the latter has limited IT capability of its own. As a member of an SBU-affiliated club you automatically join the SBU, but only your home club secretary and SBU officials see your address. The SBU shares very limited data (name, number and shortened Post Code) with other British Isles National Bridge Organisations (NBO), for example the English Bridge Union (EBU), for the purpose of identifying you if you play in their events.

Information from your results is also passed on to the SBU from other NBO, clubs and districts for use in our master point scheme.

If you subscribe to the SBU NEWS quarterly magazine then your postal address is shared with the printer who provides a mass postal mailing service to enable the magazines to be delivered via Royal Mail. They are obliged to follow GDPR rules.

Your personal data held by the SBU is not sold, shared or passed on 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 the members themselves when they join via an SBU-affiliated club or when they update their contact information themselves on MEMPAD. The information held by the SBU may be updated by the home club secretary also, not by any other club secretary.

If you are a direct member of the SBU, you will have provided your personal data directly to the SBU Membership Secretary when you joined, or as and when you update your own record on MEMPAD.

## How is your data stored?

This information is exclusively stored in digital form on our MEMPAD database, which is held on a website ([www.mempad.co.uk](http://www.mempad.co.uk)), which is security protected using DRUPAL content management software, as shown by the green padlock in the upper left-hand corner of your screen browser when viewed. The website and the database reside with an AMAZON AWS server in the “cloud”. Our data is backed up daily. All information that is held on Amazon is stored in compliance with GDPR (General Data Protection Regulation). Whenever we transfer data between SBU officials it is sent or carried in an encrypted form. Individual members need a password to access their MEMPAD data, and there are higher levels of security for the very few people who have access to all the data.

## 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 SBU Council has designated the SBU Membership Services committee chairman, as Data Protection Officer (DPO). He informs and advises the Council, Districts and Clubs about their obligations to comply with GDPR and other data protection laws. The DPO (Bill Whyte – [membership@sbu.org.uk](mailto:membership@sbu.org.uk)) will be the first point of contact for supervisory authorities (e.g. the ICO) and for members whose data is held.

The DPO will also monitor general compliance with the GDPR and other data protection laws and provide advice to clubs, districts and the SBU Council as appropriate.

## Who has access to your data?

The SBU Membership Services Committee (3 persons in total including the DPO) have access to member data in order for them to carry out their legitimate tasks for the Union. Tournament directors have limited access to name, number, rank and post code to enable them to carry out their legitimate role when directing events. A club secretary can access/modify contact data for their home club members.

The SBU has no subcontractors nor suppliers who have access to membership data, except for the contractor who designed, built and maintains the MEMPAD database. He is not free to use it for any other purpose and is obliged to conform to GDPR principles.

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

GDPR specifies that organisations must have a legal basis to collect and hold members’ personal data. In the case of the SBU, a social organisation, the legal basis for holding and using the data is that it is necessary for the purposes of its legitimate interests as a membership organisation and enable participation in an internationally recognised and regulated, competitive mind sport.

The only financial data held regarding members is a record of their payment of annual membership fees. The basis for the collection and retention of this information is simply to comply with our legal accounting obligations, as well as enabling us to know who our current members are.

## 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 ([membership@sbu.org.uk](mailto:membership@sbu.org.uk)) or log on to MEMPAD check it yourself.

You can contact us, in GDPR terms, 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.

We would not normally charge a fee for this, although under GDPR rules we can charge a reasonable fee based on the administrative cost of providing the information if the request is onerous.

## **Does the SBU 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. To be more specific we do not collect...

Date of Birth

Age

Race, colour or creed

Credit card or any other similar personal financial information.

## **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 kept or used.

- If you wish you could become an “anonymous” member. This would involve you creating 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 play in SBU tournaments. We would still need your actual email address in order to be able to contact you.
- You could maintain your 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 are able to provide you with in the way of written information, so you would not be able to receive any benefits requiring a postal address.
- We do not need you to provide us with your date of birth. If you wish to enter age-limited (junior or seniors) events then we operate on an honour basis. However, if international events are involved there would need to be some independent method of verifying age. Otherwise you could simply classify yourself as an ‘adult’ member.
- We have no way to avoid you appearing in master point promotions lists.
- You may choose not to receive information emails from the SBU but we do need an email address to communicate administrative matters to you including ‘forgotten password’ updates.
- We do not send out emails on behalf of any other organisations.
- Any of these options can be implemented for you by contacting your club secretary or the Data Protection Officer ([membership@sbu.org.uk](mailto:membership@sbu.org.uk)).

## **How long we keep your data for, and why?**

We keep member data indefinitely after you resign or your membership lapses, in case you later wish to re-join. Experience tells us that lapsed members frequently return to Scottish bridge many years later, even as many as thirty-forty years later. However, we will fully delete any former members' contact details upon their request. This means that if re-joining, such a member will start with a new number and will not benefit from any previous ranking or accumulated Master Points.

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 the SBU although Master Points 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 deleted.

At bridge events, or at prize-giving ceremonies, photographs are taken, and may be used on the SBU, District or Club websites. Players attending such events are understood by virtue of their presence to be accepting this practice.

Other data, such as that relating to accounting/personnel matters, is kept for the legally required period.

## **What happens if a member dies?**

We will delete members' data after they die, usually within a month. If requested by next-of-kin we will delete immediately.

## **Can you download your data to use it elsewhere?**

To have a download of the data held by the SBU a member or lapsed member should contact the Data Protection Officer ([membership@sbu.uk.org](mailto:membership@sbu.uk.org)).

WLW

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